

**POLY AUSTRALIA PTY LTD**

**12-24 STANLEY STREET KOGARAH**

**ACCESS REVIEW**

**Morris-Goding Accessibility Consulting**

**FINAL v2**

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## **1. EXECUTIVE SUMMARY**

The Access Review Report is a key element in the design development of 12-24 Stanley Street Kogarah and an appropriate response to the AS1428 series, Building Code of Australia (BCA), DDA Access to Premises Standards (including DDA Access Code) and ultimately the Commonwealth Disability Discrimination Act (DDA).

Morris-Goding Accessibility Consulting has prepared the Access Report to provide advice and strategies to maximise reasonable provisions of access for people with disabilities.

The review will ensure that ingress and egress, paths of travel, circulation areas, and sanitary facilities comply with relevant statutory guidelines, and in addition, compliance with a higher level of accessibility and inclusiveness benchmarks set by the project.

## **2. INTRODUCTION**

### **2.1. Background**

Poly Australia Pty Ltd has engaged Morris-Goding Accessibility Consulting, to provide a design review of 12-24 Stanley Street Kogarah. The development consists of 3 levels of basement parking, 11 levels containing sole occupancy units including communal open spaces

The proposed development falls under a number of BCA classifications:

- Class 2 (residential)

The requirements of the investigation are to:

- Review supplied drawings of the proposed development;
- Provide a report that will analyse the provisions of disability design of the development, and
- Recommend solutions that will ensure the design complies with the Disability Discrimination Act (DDA), Building Code of Australia (BCA), relevant Australian Standards, and enhanced benchmark requirements set by the project.

### **2.2. Objectives**

The Report seeks to ensure compliance with statutory requirements and enhanced benchmark requirements set by the project. The Report considers user groups, who include students, staff, and members of the public. The Report attempts to deliver equality, independence and functionality to people with a disability inclusive of:

- People with a mobility impairment (ambulant and wheelchair);
- People with a sensory impairment (hearing and vision); and
- People with a dexterity impairment

The Report seeks to provide compliance the Disability Discrimination Act 1992. In doing so, the report attempts to eliminate, as far as possible, discrimination against persons on the ground of disability.

### **2.3. Limitations**

This report is limited to the accessibility provisions of the building in general. It does not provide comment on detailed design issues, such as: internals of accessible/ambulant toilet, fit-out, lift specification, slip resistant floor finishes, door schedules, hardware and controls, glazing, luminance contrast, stair nosing, TGSIs, handrail design, signage etc. that will be included in construction documentation.

### **2.4. Accessibility of Design**

The proposed design will utilise the Federal Disability Discrimination Act (DDA), Disability (Access to Premises – Buildings) Standards 2010, BCA/DDA Access Code, Universal Design principles, the AS 1428 Series, and other design guidelines, to develop appropriate design documentation, to provide reasonable access provisions for people with disabilities.

The Project Architect and an appropriately qualified accessibility consultant will examine key physical elements during design development stage, to identify physical barriers and incorporate solutions as a suitable response to disability statutory regulations and other project objectives.

The design will be developed to ensure the principles of the DDA are upheld. Under the DDA, it is unlawful to discriminate against people with disabilities in the provision of appropriate access, where the approach or access to and within a premise, makes it impossible or unreasonably difficult for people with disabilities to make use of a particular service or amenity.

The design will comply with the requirements of the DDA Access to Premises Standards and include requirements for accessible buildings, linkages and the seamless integration of access provisions compliant with AS1428.1. The developed design will consider all user groups, who include members of the public, visitors, students and staff members.

## **2.5. Statutory Requirements**

The statutory and regulatory guidelines to be encompassed in the developed design to ensure effective, appropriate and safe use by all people including those with disabilities will be in accordance with:

- ⇒ Federal Disability Discrimination Act (DDA);
- ⇒ Disability (Access to Premises – Buildings) Standards 2010;
- ⇒ Building Code of Australia (BCA) Part D3, F2, E3;
- ⇒ AS 1428.1:2009 - (General Requirement of Access);
- ⇒ AS 2890.6:2009 - (Parking for People with Disabilities);
- ⇒ AS 1735.12:1999 - (Lift Facilities for Persons with Disabilities) ;
- ⇒ Kogarah City Council - DCP C2 – Medium Density Housing.

Please note that there are also additional advisory standards (not currently referenced by BCA or DDA Premises Standards) as well as other relevant guidelines that will be considered, as relevant to promote equity and dignity in line with overarching DDA principles and aspirational objectives. These include:

- ⇒ Universal Design Principles;
- ⇒ Human Rights Commission (HEREOC) Advisory Note February 2013 on streetscape, public, outdoor areas, fixtures, fittings and furniture;
- ⇒ AS1428.2:1992 Enhanced and Additional requirements;
- ⇒ AS1428.4.1 Draft Way-finding Standard;
- ⇒ AS3745:2010 – Planning for Emergencies in Facilities (to assist with design strategies for provision for escape for people with disability that may require assistance)

### 3. GENERAL ACCESS PLANNING CONSIDERATIONS

- The Disability Discrimination Act 1992 (DDA) is a legislative law that protects the rights of all people. The Act makes disability discrimination unlawful and promotes equal rights, equal opportunity and equal access for people with disabilities. The Australian Human Right Commission is the governing body who control and enforce DDA compliance.

Nevertheless, building elements that provide insufficient accessible provisions for people with disabilities remain subject to the DDA. The improvement of non-compliant building elements and areas to meet current access requirements will mitigate the risk of a DDA complaint be made against the building owner.

- Since the 1st May 2011, the Commonwealth's Disability (Access to Premises – Buildings) Standards 2010 (DDA Premises Standards) apply to all new building works and to affected parts of existing buildings.

The DDA Premises Standards' requirements (DDA Access Code) are mirrored in the access provisions of the BCA. New building work and affected parts must comply with the DDA Premises Standards and AS1428.1-2009 in the same manner as they would comply with the BCA by meeting deemed-to-satisfy provisions or by adopting an alternative solution that achieves the relevant performance requirements.

- By utilizing AS 1428 suite of Standards, the overall aim is to provide continuous accessible paths of travel to connect the proposed development to and through public domain areas and between associated accessible buildings in accordance with the DDA Access Code.
- MGAC supports the use and consideration of universal design (UD) principles into the design to maximize access for all people. We will assist the design team to incorporate UD principles where possible within the project, while still meeting mandatory compliance requirements.

A UD approach has numerous benefits for the client as an education provider, for businesses within the building, for individual users and for society in general. An inclusive environment that can be accessed, understood and used by as many people as possible, is good business sense, is more sustainable and is socially progressive, in line with the aims of the DAP.

Universal design principles consider the needs of a broad range of people including older people, families with children and pushing prams, people from other cultures and language groups, visitors in transit and people with disability. By considering the diversity of users, the design will embed access into and within it, so that benefits can be maximized, without adding on specialized 'accessible' features that can be costly, visually unappealing and may perpetuate exclusion and potential stigma.

The seven key Universal design principles to consider in the on-going design include:

- Principle 1: Equitable Use
- Principle 2: Flexibility in Use
- Principle 3: Simple and Intuitive Use
- Principle 4: Perceptible Information
- Principle 5: Tolerance for Error
- Principle 6: Low Physical Effort

- Principle 7: Size and Space for Approach and use



## **4. INGRESS & EGRESS**

### **4.1. External Linkages**

The BCA and DDA Premises Standards contain requirements for site approaches for the use of persons with disabilities. These requirements can be summarised as follows:

- It will be necessary to provide an accessible path of travel from main pedestrian entry points at the site allotment boundary to all building entrances compliant with AS1428.1:2009.
- An accessible path of travel between buildings (or parts of buildings) that are connected by a pedestrian linkage, within the site allotment boundary, compliant with AS1428.1:2009 is also required.
- An accessible path of travel to building entrances (required to be accessible) from associated accessible car-parking bays, compliant with AS1428.1:2009 is required.

#### **Assessment**

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements. On the basis of the current level of detail all access requirements appear capable of achieving compliance. Further work will be required during design development stage to ensure appropriate outcomes are achieved.

### **4.2. Entrances**

The BCA and DDA Premises Standards contain requirements for building entry for the use of persons with disabilities. These requirements can be summarised as follows:

- Access is required through at least 50% of entrances, including the principal pedestrian entrance/s to all buildings or parts of buildings (ie. when they have a separate function and/or use eg. external retail tenancy). Note it is preferred that all entrances are accessible.
- A non-accessible entry cannot be located more than 50m distance from an accessible entry (for buildings greater than 500m<sup>2</sup>).
- All accessible doors to have 850mm min. clear width opening and suitable door circulation area, compliant with AS1428.1:2009. Note: Manual doors require lightweight door forces to be operable by people with disabilities (20N max.). We recommend that main entrances include automated sliding doors to be used where possible. Revolving doors are not accessible, if maintained an alternate accessible door is required adjacent.
- An accessible path of travel eg. ramp or lift needs to be provided adjacent (or in reasonable proximity) to any stair access. Note: providing choice of access route directly adjacent so that people can start and finish in the same location/travel similar route promotes inclusion and UD principles.

#### **Assessment**

Special attention required for Stanley Lane and Stanley Street hinged doors.

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements. On the basis of the current level of detail all access requirements appear capable of achieving compliance. Further work will

be required during design development stage to ensure appropriate outcomes are achieved.

#### **4.3. Emergency Egress**

BCA 2016 Part D2.17 has requirements for all fire-isolated egress stairs from areas required to be accessible (not communication stairs) to include at least one continuous handrail designed to be compliant with AS1428.1 Clause 12.

Provision of an off-set tread at the base of stair flights or an extended mid-landing that will allow a 300mm extension clear of egress route is considered appropriate for achieving a consistent height handrail (without vertical or raked sections).

Such an off-set tread configuration has been shown at the majority of stairs and would appear to be possible elsewhere, subject to further detail design.

Where fire-isolated egress stairs will also be used for communication stair purposes between levels, they should be designed to meet AS1428.1:2009. Confirmation is required on the likely use of certain stairs for this purpose.

##### **Assessment**

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements. On the basis of the current level of detail all access requirements appear capable of achieving compliance. Further work will be required during design development stage to ensure appropriate outcomes are achieved.

## **5. PATHS OF TRAVEL**

### **5.1. Circulation Areas**

The BCA and DDA Premises Standards contain requirements for circulation areas for the use of persons with disabilities. These requirements can be summarised as follows:

- Wheelchair passing bays (1800mm width x 2000 length) are also required when a direct line of sight is not available and are to be provided at 20m max. intervals along access-ways.
- Turning spaces (at least 1540mm W x 2070mm L) are required within 2m of every corridor end and at 20m.max intervals along all access-ways. This is needed for wheelchairs to make a 180 degree turn, compliant with AS1428.1:2009.
- All common-use doors (ie. not excluded under Part D3.4) to have 850mm min. clear width opening (each active door leaf) and suitable door circulation area, compliant with AS1428.1:2009.
- All common-use corridors and accessible paths of travel to be at least 1000mm min. width when travelling in linear direction Note: Increased clear width paths of travel required for doorway circulation, turning areas etc.

#### **Assessment**

Special attention required for passing bays along corridor bends and lift lobby doors into residential corridors.

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements. On the basis of the current level of detail all access requirements appear capable of achieving compliance. Further work will be required during design development stage to ensure appropriate outcomes are achieved.

### **5.2. Passenger Lifts**

The BCA and DDA Premises Standards contain requirements for passenger lifts and circulation areas for the use of persons with disabilities. These requirements can be summarised as follows:

- Passenger lifts to have min. internal size at floor of 1400mm width x 1600mm depth, compliant with BCA/DDA Access Code Part E3.6 and AS1735.12.
- All lift lobbies and main corridors on each level to have 1800mm min. clear width to allow two wheelchairs ability to space pass each other.

#### **Assessment**

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements. On the basis of the current level of detail all access requirements appear capable of achieving compliance. Further work will be required during design development stage to ensure appropriate outcomes are achieved.

## **6. ADAPTABLE UNITS**

### **6.1. Adaptable Unit Provision**

The concept of adaptable housing is to design units with provisions in place from the outset (pre-adaption) so they can be easily adapted to meet changing needs of residents in the future (post-adaption) in accordance with AS4299.

From the information provided and in line with Council DCP, Part C2 section 13 required 51+ units – 6 adaptable units + 10% of additional dwellings beyond 60 (rounded up to the nearest whole number).

#### **Assessment**

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements. On the basis of the current level of detail all access requirements appear capable of achieving compliance. Further work will be required during design development stage to ensure appropriate outcomes are achieved.

### **6.2. Adaptable Unit Design**

The following requirements are to be satisfied in the provision of adaptable unit design at pre-adaptation stage.

- The entry door of the unit achieves 850mm clear width opening (920 door leaf). Latch side clearance of 530mm needs to be achieved at pre adaptation, externally and internally of the door in accordance with AS4299.
- The kitchen needs 1550mm circulation space outside of the kitchen work spaces
- The bathroom needs to be of an adequate size to achieve an AS1428.1 compliant bathroom of shower, WC and basin with required circulation spaces. Capped off service can be provided for the relocation of basin at post adaptation. The shower recess will require review during design development.
- The living area needs to be large enough to achieve a circulation space of 2250mm min diameter after furniture placement, compliant with AS4299.
- The bedroom needs to achieve 1 metre either side of queen size bed and 1550 x 2070mm at the base of bed or similar configuration
- The laundry area requires 1500mm in front of laundry appliances in accordance with AS4299.
- All doors need to achieve 850mm clear opening width from the outset and easily achievable latch side clearances at post adaptation, compliant with AS1428.1:2009.

#### **Assessment**

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements. On the basis of the current level of detail all access requirements appear capable of achieving compliance. Further work will be required during design development stage to ensure appropriate outcomes are achieved.

## **7. SEPP 65 SILVER LIVABLE UNITS**

### **7.1. Silver Livable Unit Provision**

The following requirements are to be satisfied in the provision of visitable units

- A total of 20% units are required to satisfy SEPP 65 (including referenced Apartment Design Guide) requirements to incorporate Liveable Housing Guidelines Silver Level Universal design features.
- Note the % adaptable units can be counted in the 20% calculation if the apartment also meets the following requirements.

#### **Assessment**

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements. On the basis of the current level of detail all access requirements appear capable of achieving compliance. Further work will be required during design development stage to ensure appropriate outcomes are achieved.

### **7.2. Silver Livable Unit Design (SEPP65)**

In NSW, SEPP 65 applies to residential flat buildings that are three or more storeys and have four or more dwellings; mixed use development with residential accommodation and shop top housing.

For these types of residential developments, clarification has been sought and confirmed from the consultant Planner on the applicability of SEPP 65 and the referenced Apartment Design Guide to the development. Note: Commencement date for SEPP 65 Amendment was 17 July 2015.

Under SEPP 65 referenced Apartment Design Guide Section 4Q: Universal Design, 20% total dwellings are required to incorporate Silver level universal design features (from LHA: Liveable Housing Design Guidelines). The intent is to improve the liveability of mainstream housing.

Liveable Housing Design, Silver Level-Universal Design, dwellings must achieve 7 - 8 Elements from the outset (there is no pre and post-adaptation stage of the unit as in AS4299).

Note: Where the BCA is applicable to common areas of the development, then the BCA requirements take precedence over the LHA guidelines.

#### **Element 1**

Dwelling access: There is at least one safe, continuous step-free pathway from the front allotment boundary or a dedicated car parking area (that can include the drive-way on allotment) to a dwelling entrance that is level in accordance with LHA Silver requirements.

#### **Element 2**

Dwelling entrance: There is at least one level (step-free) entrance (820mm min. clear opening door width) into the dwelling to enable home occupants to easily enter and exit the dwelling in accordance with LHA Silver requirements. The entrance is to have a 1200mm x 1200mm level landing area on the external side, reasonable shelter from weather and be connected to Element 1.

### Element 3

Car-parking: Where the dwelling access is not achievable from the front allotment site boundary (Element 1), then the dwelling access can be from a dedicated increased size car-space that will allow a person to open their car doors fully and easily move around vehicle. The dedicated car-parking space is to be 3.2m W x 5.4m L, and have level slip resistant surface (1:40 max. gradient/crossfall or 1:33 bitumen).

### Element 4

Internal Doors and corridors: Internal doors and corridors facilitate comfortable and unimpeded movement between spaces. This applies to all doors to rooms in dwelling on entry level ie. living, dining, bedroom, bathroom, kitchen, laundry, sanitary etc. that need to have 820mm min. clear opening door width and level threshold transition (ie. set-down slabs to wet areas) connected by 1000mm min. clear width of corridor/path of travel.

Note: LHA does not specify that level access is to be provided to external balconies or terrace areas on the entry level of dwelling (unless it forms part of Element 1), however this should be encouraged as good practice.

### Element 5

Toilet: There is at least one ground (or entry) level toilet within dwelling to support easy access for home occupants and visitors. This requires one toilet on entry level located in the corner and adjacent to a wall (to enable future installation of grab rails), with a clear circulation space of 900 W x 1200mm L forward of the pan and free of door swing.

### Element 6

Shower – There is a bathroom and shower designed for easy and independent access for all home occupants. This requires at least one hob-less (step-free), slip resistant shower located in corner of at least one bathroom (to enable future installation of grab rails).

### Element 7

Reinforcement of Bathroom and toilet walls – The bathroom and toilet walls are built to enable grabrails to be safely and economically installed. If lightweight walls are proposed for bathroom, around bath, shower and WC, reinforcement is required to meet LHA Figures 6a/b, 7a/b, 8a/b and LHA requirements.

### Element 8

Internal stairways - Where installed, stairways are designed to reduce the likelihood of injury and also enable future adaption. This requires a continuous handrail on one side of stairs when the rise exceeds 1m.

Note: There is no clear definition of what a continuous handrail means, but it should not break a hand-hold and AS1428.1 profile is recommended/preferred as good practice.

***Note: If the residential development is also required to have adaptable units under the Local DCP, then the required % of adaptable units may be counted towards the 20% Silver level-Universal design calculation provided that the units satisfy both AS4299 and LHA Silver requirements.***

### Assessment

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements. On the basis of the current level of detail all access requirements appear capable of achieving compliance. Further work will be required during design development stage to ensure appropriate outcomes are achieved.

## **8. FACILITIES & AMENITIES**

### **8.1. Common Areas**

The BCA and DDA Premises Standards contain requirements for common use areas suitable for the use of persons with disabilities. These requirements can be summarised as follows:

- Mailboxes, bike stand areas and garbage rooms within residential buildings require appropriate accessibility.
- Wheelchair access is required to any external and outdoor terrace areas including communal roof gardens compliant with AS1428.1.

#### **Assessment**

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements. On the basis of the current level of detail all access requirements appear capable of achieving compliance. Further work will be required during design development stage to ensure appropriate outcomes are achieved.

### **8.2. Car Parking**

The BCA and DDA Premises Standards contain requirements for parking which are applicable to this project. These requirements can be summarised as follows:

- Provide an adaptable unit car bay for each adaptable unit. These car bays can have 3.8 metre width or 2.4 m with 2.4 metre shared zone and or compliant with AS2890.6.
- All accessible car bays to be located near relevant lifts and/or associated building entry points to minimise distance to relevant lift and ensure accessible path of travel between these areas.
- Ensure 2.5m min. height clearance, compliant with AS2890.6 fig 2.7 over accessible car bays with 2.2 m min. vertical clearance leading to the accessible and adaptable unit car bays (Note: consideration for 2.3 or 2.4m min. height preferred for higher vans/adapted vehicles is recommended as good practice).
- Visitor accessible parking to be compliant with AS1428.1.

#### **Assessment**

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements. On the basis of the current level of detail all access requirements appear capable of achieving compliance. Further work will be required during design development stage to ensure appropriate outcomes are achieved.

## **9. CONCLUSION**

MGAC has assessed the proposed scheme for 12-24 Stanley Street Kogarah. The proposed drawings indicate that accessibility requirements, pertaining to external site linkages, building access, common area access and parking can be readily achieved. It is advised that MGAC will work with the project team as the scheme progresses to ensure appropriate outcomes are achieved in building design and external domain design.