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St. George Community Housing

30-38 Ironbark Avenue, Casula

Access Review – Final v3

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1. Executive Summary

The Access Review Report is a key element in the design development of 30-38 Ironbark Avenue, Casula, NSW 2170 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.

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2. Introduction

2.1. Background

St. George Community Housing has engaged Morris-Goding Accessibility Consulting, to provide a design review of the residential units, located at 30-38 Ironbark Avenue, Casual, NSW 2170.

The proposed development falls under a number of BCA classifications:

- Class 2 (Residential Building)

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 1428.4.1:2009 - (Tactile Ground Surface Indicators);
- AS 2890.6:2009 - (Parking for People with Disabilities);
- AS 1735.12:1999 - (Lift Facilities for Persons with Disabilities);
- AS 4299:1995 – (Adaptable Housing)
- Liverpool Development Control Plan 2008;
- Livable Housing Design Guidelines Fourth Edition;

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 over-arching 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);

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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 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 external linkages. There are currently 4 entry points on the site from pedestrian footpaths/public access leading into lobby areas of the development. There are also currently 3 main footpaths from the pedestrian/public access leading to residential unit pathways which are common use.

All entry points to common access ways of the development are to be compliant with AS1428.1. Currently, all paths of travel show that they can achieve compliance as per AS1428.1. The south west corner entry has sufficient space to be modified to readily achieve compliance as per AS1428.1.

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 (i.e. when they have a separate function and/or use e.g. 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 500m2).
- 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.

Assessment

Currently, the clear width at entry points show that 850mm min. clear width doors with compliant circulation can be readily achieved (south west entry point to be modified at design detail stage to comply with AS1428.1).

MGAC has reviewed the drawings and documentation in relation to the aforementioned entrances 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.

There is currently no mandatory requirement within BCA or DDA Premises Standards for provision of independent accessible egress for people with a disability in accordance AS1428.1 and this remains an important DDA issue. Consideration of an accessible egress strategy with emergency evacuation plan will be needed as a minimum starting point.

Consideration of waiting spaces within fire-stairs should be strongly considered for people with mobility impairment. The configuration of the future design of the fire egress stairs of the development would generally require:

- 850mm min. clear width egress door and 510mm min. external door circulation area, compliant with AS1428.1:2009.
- Wheelchair space (800mm W x 1300mm L min. dimensions) within fire-isolated stair, outside of the required egress path, that can be accessed on a continuous path of travel. Currently, this requirement has been achieved.
- Alternative evacuation means e.g. emergency passenger lift/s could be provided instead of/or only in addition to ‘waiting spaces’ in line with ABCB Handbook and/or consideration of stair evacuation devices (with appropriate storage and staff training) within fire stairs.

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. The current layout shows passing bays have been provided.
- 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 (i.e. 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 (or 1200mm min. under AS1428.2). Note: Increased clear width paths of travel required for doorway circulation, turning areas etc. Currently, the drawings show that this requirement has been met as most pathways are 1200mm and greater.

Assessment

All areas have been provided with passing bays turning spaces and paths of travel circulation space compliant with AS1428.1. MGAC has reviewed the drawings and documentation in relation to the aforementioned passenger lift 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. Currently, this requirement has been shown to be compliant as drawings show that lift internal sizes measure 2000mm x 1800mm.
- 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. Currently, there are passing bays provided at all levels at both lift lobbies, compliant with AS1428.1 and the DDA Premises Standards.

Assessment

MGAC has reviewed the drawings and documentation in relation to the aforementioned passenger lift 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.

5.3. Stairs & Ramps

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

- Ramps are to have maximum 1:14 gradient with landings at no more than 9 metre intervals.
- Ramps are to have handrails on both sides with minimum 1 metre clearance in accordance with AS1428.1.
- Landings are to have 1200mm length with 1500mm length at 90 degree turns.
- Stairs are to have handrails on both sides in accordance with AS1428.1.
- Stairs and ramps are to be offset to ensure no encroachment of handrail extensions into from transverse path of travel at top and bottom of stair/ramp.

Assessment

Currently, the ramps, stairs and walkways comply with AS1428.1. Landings at the top of walkways comply with AS1428.1.

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.

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

- A total of 10% adaptable units are required based on St. George Community Housing guidelines and information provided.
- The adaptable units are to be designed in accordance with AS4299 Class C.

Assessment

A total of 63 dwellings have been proposed throughout the development. There are 7 apartments (10% of total) designed to be adaptable, which satisfies St. George Community prerequisites.

The adaptable units have been allocated as units G.02, 1.06, 1.09, 2.06, 2.09, 3.06 and 3.06 and a mix of 1 and 2 bedroom units.

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 (920mm 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 1550mm 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

The drawings provided show spatial requirements have been generally met to achieve compliance with AS4299 in relation to the adaptable units provided.

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. 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 Livable Housing Guidelines Silver Level Universal design features. However, St. George Community Housing requires an achievement of 100% of units provided to achieve Silver Level requirements.

Assessment

A total of 63 dwellings have been proposed throughout the development. All units are designed to be visitable and to meet the above requirements and designed in accordance to Livable Housing Guidelines Silver Level Universal Design.

7.2. Silver Livable Unit Design

The following requirements are to be satisfied in the design of these units

- The entry door into the units are to be detailed to achieve suitable clear width of at least 820mm during detailed design development stage to be compliant with Silver Level rating requirements in accordance with Livable Housing Design Guideline 2015:
- From the unit entry, there needs to be appropriate 1m clearances throughout the unit to allow suitable accessible paths of travel within accordance with Silver Level rating requirements in accordance with Livable Housing Design Guideline 2015.
- All internal doorways into bathroom, bedroom and out to balcony are required to achieve at least 820mm clear open widths in accordance with Silver Level rating requirements in accordance with Livable Housing Design Guideline 2015. This can be achieved during detailed design development.
- The silver levels units require bathrooms that can accommodate the required 900mm wide by 1200mm long clear visitable toilet circulation space in front of the leading edge of the pan compliant with Silver Level rating requirements in accordance with Livable Housing Design Guideline 2015.
- The walls surrounding the shower and toilet pan require sufficient reinforcements for the provision of grab rails in the future when 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 per Silver Level requirements of the Livable Housing Guidelines (LHA) Fourth Edition 2017. Further work will be required during design development stage to ensure appropriate outcomes are achieved.

8. 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:

- For class 2, access is required to a unique common use facility such as to common use courtyards within buildings. Currently, this requirement has been achieved as there is an accessible path of travel from the lift lobbies to the common use courtyards.
- Mailboxes and garbage rooms within residential buildings require appropriate accessibility. Currently, this requirement has been achieved.

Assessment

Currently, there is accessible path of travel to the Bin Store Room and Mailboxes of the residential building, compliant with AS1428.1

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:

- Accessible car bays require 2.4 metre with 2.4 metre shared area.
- 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. Currently, the accessible parking bays are provide in near vicinity of the building entrance and lift lobbies with a compliant path of travel to be to lift lobby areas that comply with AS1428.1.
- 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). From the information provided, this requirement has been currently met as parking bays and path of travel to the parking bays is done so over open air.

Assessment

Currently, there are 30 car parking bays provided and 7 for the adaptable unit achieving AS4299, AS2890.6 and St. George Community Housing requirements. Currently, the accessible parking bays have been designed in accordance to AS2890.6 (2.4m x 5.4m with adjacent share zone).

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.

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9. Conclusion

MGAC has assessed the proposed scheme for 30-38 Ironbark Avenue, Casula. The proposed drawings indicate that accessibility requirements, pertaining to external site linkages, building access, common area access, and parking achieve compliance per AS1428.1, AS2890.6, AS4299 and the DDA Premises Standards.

Further work is required to achieve full compliance; however, amendments can be readily made at design detail stage to do so as spatial requirements have been widely met. 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.