



**To:** St Edmonds College  
C/- Glendenning Szoboszlay Architects Pty Ltd

**Project:** St Edmonds College, Wahroonga

**Report:** Development Application Access Assessment Report

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## 1 BASIS OF ASSESSMENT

### 1.1 Location

The building development, the subject of this report, is located at 60 Burns Road, Wahroonga and is known as the St Edmund's College. The College is a specialist education facility for students with a range of disabilities, ranging from years 7-12. It is proposed to carry demolition of part of the building and construct substantial alterations and additions to the ground and first floor.



Photograph courtesy of Six Maps

### 1.2 Purpose

The purpose of this report is to assess the proposed / existing building against the following Deemed-to-Satisfy provisions of the Building Code of Australia 2019 (BCA2019) to clearly outline those areas where compliance is not achieved and provide recommendations to upgrade such areas to achieve relevant compliance:

- Disability Discrimination Act 1992 (DDA);
- Disability Access to Premises Standards 2010 (Premises Standards);
- Building Code of Australia 2019 (BCA2019) – Part D3 and Clauses E3.6 and F2.4;
- Ku-Ring-Gai Council's Development Control Plan 2015 (DCP); and
- Applicable Australian Standards AS1428.1:2009, AS1428.4.1:2009 and AS2890.6:2009.

### 1.3 Limitations

This report is limited to an assessment of the access and amenity provisions for people with a disability against the provisions of the BCA2019 as outlined in 1.2 above. It is not an assessment of the proposal against all provisions of the BCA2019 and if this is required, a separate report will be necessary.

This report does not include nor imply any detailed assessment for design, compliance or upgrading for:

- The structural adequacy or design of the building;
- The inherent derived fire-resistance ratings of any existing or proposed structural elements of the building (unless specifically referred to); and
- The design basis and/or operating capabilities of any existing or proposed electrical, mechanical or hydraulic fire protection services.

This report does not include, or imply compliance with:

- The Disability Discrimination Act (it cannot be guaranteed that that a complaint under the DDA will not be made, however should the building comply with BCA2019 and the Premises Standard then those responsible for the building cannot be subject to a successful complaint);
- BCA2019 Sections B, C, E, F, G, H, I, J, Parts D1 and D2;
- Demolition Standards not referred to by the BCA2019;
- Work Health and Safety Act;
- Construction Safety Act;
- Requirements of other Regulatory Authorities including, but not limited to, Telstra, Telecommunications Supply Authority, Water Supply Authority, Electricity Supply Authority, Work Cover, Roads and Maritime Services (RMS), Roads and Transport Authority, Local Council, ARTC, Department of Planning and the like;
- Conditions of Development Consent issued by the Local Consent Authority; and
- This report does not assess the safety of the particular aspects of the building but merely the minimum standards called up by the Access provisions of BCA2019.

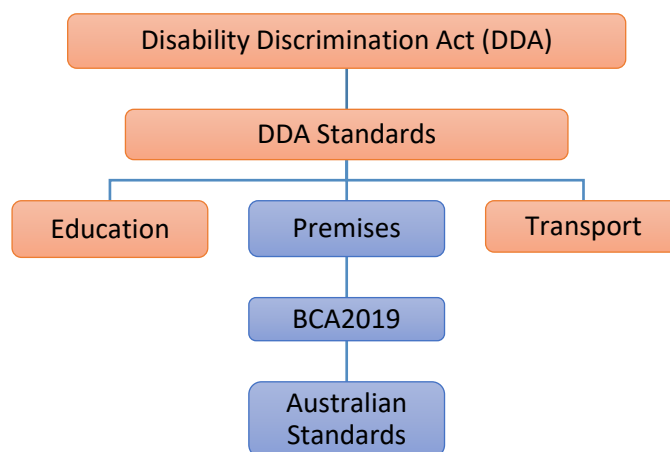
#### 1.4 Federal Disability Discrimination Act (DDA)

Disability is broadly defined and includes disabilities which are physical, intellectual, psychiatric, neurological, cognitive or sensory (a hearing or vision impairment), learning difficulties, physical disfigurement and the presence in the body of disease causing organisms.

All organisations have a responsibility, under the DDA, to provide equitable, dignified access to goods and services and to premises used by the public. Premises are broadly defined and would include all areas included within the subject development.

The DDA applies nationally and is complaint based. While the BCA2019 is recognised as a design standard to satisfy certain aspects of the DDA, compliance with the BCA2019 and the referenced standards does not guarantee that a complaint will not be lodged.

The graph below indicates the current relationship of the BCA2019 to the DDA.



#### 1.5 Design Documentation

This report has been based on the Design plans and Specifications listed in Annexure A of this Report.

## 2 BUILDING DESCRIPTION

For the purposes of the BCA2019 and Access Code for Buildings (Premises Standards – Schedule 1) the development may be described as follows.

### 2.1 Classification

Under the provisions of Clause A3.2 of BCA2019 and Premises Standards Access Code, the building has been classified as follows:

Table 1. Building Classification

Class	Level	Description
5	Ground and First Floor	Office and Administration areas.
9b	Ground and First Floor	Areas of public assembly for school purposes including the swimming pool and hall.
10a	Ground Floor	Waste and Switch Room.

### 2.2 Areas Required to be Accessible

Under the provisions of Clause D3.1 of BCA2019 and Premises Standards Access Code, the following areas of the building are required to be accessible:

Table 2. Areas Required to be Accessible

Level	Area
Ground and First Floor	To and within all areas normally used by the building's occupants. This will include existing areas of the building that are subject to any new works.

Note: The limitations and exemptions of Clauses D3.2, D3.3 and D3.4 of the BCA2019 have been considered where applicable in the process of developing the above table.

### 3 ACCESS REQUIREMENTS FOR PEOPLE WITH DISABILITIES

#### 3.1 Introduction

The table below is a summary of all the individual elements that relate directly to the ability of a person with a disability to access all the portions of the building required to be accessible as outlined in 2.2 of this report.

Accessibility has been assessed against the relevant portions of the BCA2019, Access Code for Buildings and the related Australian Standards for each item listed below.

The abbreviations outlined below have been used in the following tables.

<b>N/A</b>	Not Applicable. The Deemed-to-Satisfy clause is not applicable to the proposed design.
<b>Complies</b>	The relevant provisions of the Deemed-to-Satisfy clause have been satisfied by the proposed design.
<b>CRA – Refer Annexure B</b>	‘COMPLIANCE READILY ACHIEVABLE’. It is considered that there was not enough information included in the documentation to accurately determine strict compliance with the individual clause requirements. However, subject to noting the requirements of each clause, compliance can be readily achieved.
<b>FI</b>	Further Information is necessary to determine the compliance potential of the building design.
<b>PS</b>	Performance Solution with respect to this Deemed-to-Satisfy Provision is necessary to satisfy the relevant Performance Requirements.
<b>DNC</b>	Does Not Comply.
<b>Noted</b>	BCA Clause simply provides a statement not requiring specific design comment or confirmation.

#### 3.2 Council’s Development Control Plan Requirements (DCP)

Part 22 of Ku-Ring-Gai Council’s DCP contains provisions relating to Accessibility.

Part 22.1 “Equitable Access” requires that the development design for accessibility and inclusion where access is defined as the following;

- i. An ability to travel from one point to another in a continuous and independent manner, following a reasonable route;
- ii. An ability to communicate or obtain information or service from any person, display or facility which is intended to communicate or provide that information or service to any person.

Accessibility of the development is discussed further in the following part including how the development meets the Disability Discrimination Act 1992 requirements.

Part 22.5 “Parking for People with a Disability” in accordance with AS/NZS 2890.6-2009 and a rate of at least 2% of spaces. Note that this exceeds the minimum required by the BCA and DDA Premises Standards of 1%, however can be readily achieved.



### 3.3 Building Code of Australia 2019 / Premises Standards Access Code Assessment Summary (BCA2019)

Table 3. BCA2019 Summary

CLAUSE		COMMENT	STATUS
<b>SECTION D: ACCESS AND EGRESS</b>			
<b>PART D3 - ACCESS FOR PEOPLE WITH A DISABILITY</b>			
D3.0	Deemed To Satisfy Provisions	-	Noted
D3.1	General Building Access Requirements	<p>The building is required to be accessible to and within all areas normally used by its occupants. Accessible meaning having the features to enable use by persons with a disability.</p> <p>Access must be provided to all areas of new works and maintain continuous accessways to the buildings entrances. It is noted that the design can accommodate accessibility throughout, including the provisions of lifts.</p>	CRA – Refer Annexure B
D3.2	Access to Buildings	<p>Accessway must be provided to a building required to accessible –</p> <ul style="list-style-type: none"> <li>(i) from the main points of a pedestrian entry at the allotment boundary; and</li> <li>(ii) from any required accessible carparking space on the allotment.</li> </ul> <p>It is considered that the design make suitable provision for access through main Wahroonga Avenue entry with connections available from both front entry and the staff car parking areas.</p> <p>At least 50% of the entrance points into the building must be accessible. With any non-accessible entrances not more than 50m from an accessible one.</p> <p>Where a doorway on an accessway has multiple leaves, (except an automatic opening door) one of those leaves must have a clear opening width of not less than 850 mm in accordance with AS 1428.1.</p>	CRA – Refer Annexure B
D3.3	Parts of Buildings to be Accessible	<p>The building must maintain the accessible features of this Clause and the relevant parts of AS 1428.1-2009.</p> <p>Floor surfaces are to be designed to be level and suitably slip resistant. Clearances for wheelchair turning and manoeuvring are required, including at doorways it is considered that these can be achieved.</p> <p>Walkways and ramps must comply with clause 10 of AS 1428.1-2009. Non-fire-isolated stairways must comply with Clause 11 of AS 1428.1-2009.</p>	CRA – Refer Annexure B
D3.4	Exemptions	Certain areas can be exempted under this clause if pose a health and safety risk for people with disability and /or access would be inappropriate because the particular purpose for which this area is used (e.g. plant rooms, service areas, heavy / toxic item storage, etc.).	Noted
D3.5	Accessible Car Parking	Accessible car spaces must be provided at a rate of at least 1 per 100 or part thereof. It should be noted this differs from the DCP requirements of at least 2%. The	CRA – Refer Annexure B



SECTION D: ACCESS AND EGRESS		
	design and construction of the car spaces must be in accordance with AS/NZS 2890.6-2009. It is noted that suitable provision is made within the entry car parking area. A further space would need to be available within the staff car parking area. This could be suitably achieved.	
D3.6 Signage	<p>Braille and tactile signage complying with Specification D3.6 and incorporating the international symbol of access, or deafness as appropriate, must identify each:</p> <ul style="list-style-type: none"> <li>– sanitary facility; and</li> <li>– any space with a hearing augmentation system; and</li> <li>– identify each door required by E4.5 to be provided with an exit sign and state “Exit” and “Level” and either: <ul style="list-style-type: none"> <li>(aa) the floor level number; or</li> <li>(bb) a floor level descriptor; or</li> <li>(cc) a combination of (aa) and (bb)</li> </ul> </li> </ul> <p>Signage including the international symbol for deafness in accordance with AS 1428.1 must be provided within a room containing a hearing augmentation system identifying –</p> <ul style="list-style-type: none"> <li>– the type of hearing augmentation; and</li> <li>– the area covered within the room; and</li> <li>– if receivers are being used and where the receivers can be obtained.</li> </ul> <p>Signage to accessible sanitary facilities must identify if the facility is suitable for left or right handed use; and</p> <p>Signage to identify an ambulant accessible facility in accordance with AS 1428.1 must be located on the door of the facility.</p> <p>Where a pedestrian entrance is not accessible, directional signage incorporating the international symbol of access, in accordance with AS 1428.1 must be provided to direct a person to the location of the nearest accessible pedestrian entrance;</p> <p>Where a bank of facilities is not provided with an accessible unisex sanitary facility, directional signage incorporating the international symbol of access in accordance with AS 1428.1 must be placed at the location of the sanitary facilities that are not accessible, to direct a person to the location of the nearest accessible unisex facility.</p>	CRA – Refer Annexure B
D3.7 Hearing Augmentation	<p>A hearing augmentation system must be provided where an inbuilt amplification system (this would include in built AV systems), other than one used only for emergency warning, is installed in any room.</p> <p>If a hearing augmentation systems is an induction loop or infra red system it must comply with the particular coverage requirements of this Clause.</p>	CRA – Refer Annexure B

SECTION D: ACCESS AND EGRESS		
	Any screen or scoreboard associated with a Class 9b building and capable of displaying public announcements must be capable of supplementing any public address system, other than a public address system used for emergency warning purposes only.	
D3.8 Tactile Indicators	<p>a) For a building required to be accessible, tactile ground surface indicators must be provided to warn people who are blind or have a vision impairment that they are approaching—</p> <ul style="list-style-type: none"> <li>(i) a stairway, other than a fire-isolated stairway; and</li> <li>(ii) a ramp other than a step ramp, kerb ramp or swimming pool ramp; and</li> <li>(iii) in the absence of a suitable barrier— <ul style="list-style-type: none"> <li>(A) an overhead obstruction less than 2 m above floor level, other than a doorway; and</li> <li>(B) an accessway meeting a vehicular way adjacent to any pedestrian entrance to a building, excluding a pedestrian entrance serving an area referred to in D3.4, if there is no kerb or kerb ramp at that point,</li> </ul> </li> </ul> <p>except for areas exempted by D3.4. (b)</p> <p>b) Tactile ground surface indicators required by (a) must comply with sections 1 and 2 of AS/NZS 1428.4.1.</p>	CRA – Refer Annexure B
D3.9 Wheelchair seating spaces in Class 9b Assembly Buildings	-	N/A
D3.10 Swimming Pools	It is understood that no works are proposed to the existing swimming pool.	N/A
D3.11 Ramps	On an accessway a series of connected ramps must not have a combined vertical rise of 3.6m and a landing for a step ramp must not overlap a landing for another step ramp or ramp.	CRA – Refer Annexure B
D3.12 Glazing on an Accessway	On an accessway, where there is no chair rail, handrail or transom, all frameless or fully glazed doors, sidelights and any glazing capable of being mistaken for a doorway or opening, must be clearly marked in accordance with AS 1428.1.	CRA – Refer Annexure B
SPECIFICATION D3.6 – BRAILLE AND TACTILE SIGNS		
1. Scope	Noted	-
2. Location of Braille and Tactile Signs	The location of braille and tactile signs shall be in accordance with AS1428.1 and Specification D3.6.	CRA – Refer Annexure B
3. Braille and Tactile Sign Specification	All accessible signage to comply with this clause and AS1428.1. Tactile characters to be raised in sentence case with matt finish.	CRA – Refer Annexure B
4. Luminance-contrast	All accessible signage to comply with this clause and AS1428.1. The sign background to have at least 30% luminance contrast with the 5mm width border, tactile characters and braille. Luminance contrast to be measured on the location once installed.	CRA – Refer Annexure B

SECTION D: ACCESS AND EGRESS			
5.	Lighting	Braille and tactile signs to be appropriate illuminated, in complaint with this Clause and AS1428.1. The access pathway must have a minimum luminance contrast of 30%, in accordance with AS1428.1.	CRA – Refer Annexure B
6.	Braille	Braille must be in accordance with the criteria set out by the Australian Braille Authority.	CRA – Refer Annexure B

SECTION E: SERVICES AND EQUIPMENT			
PART E3 – LIFT INSTALLATIONS			
E3.0	Deemed-to-Satisfy Provisions	-	Noted
E3.6	Passenger Lifts	<p>The passenger lifts must be one of the types specified in Table E3.6a, have accessible features in accordance with Table E3.6b, as follows:</p> <ul style="list-style-type: none"><li>– Handrail complying with the provisions for a mandatory handrail in AS 1735.12.</li><li>– Lift floor dimensions not less than 1100 mm wide by 1400 mm deep (lifts that travel not more than 12m)</li><li>– Minimum clear door opening complying with AS 1735.12.</li><li>– Passenger protection system complying with AS1735.12.</li><li>– Lift car and landing control buttons complying with AS 1735.12.</li><li>– Lighting in accordance with AS 1735.12.</li></ul> <p>Emergency hands-free communication, including a button that alerts a call centre of a problem and a light to signal that the call has been received.</p> <p>Note: Platform lifts can be used up to 4m travel distance.</p>	CRA – Refer Annexure B

SECTION F: HEALTH AND AMENITY			
PART F2 – SANITARY AND OTHER FACILITIES			
F2.0	Deemed-to-Satisfy Provisions	-	Noted
F2.4	Accessible Sanitary Facilities (including Table F2.4)	<p>Each storey of the building must be provided with unisex accessible facilities and not less than 50% of the toilet banks on the storey. Their design and construction must comply with AS 1428.1-2009.</p> <p>The facilities will need to be a combination of both left handed and right handed pan transfer arrangements.</p> <p>Cubicles suitable for use by persons with an Ambulant disability must be provided within the Male and Female facilities where an accessible facility is also provided.</p>	CRA – Refer Annexure B
F2.9	Accessible adult change facilities	-	N/A

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#### 4 STATEMENT OF COMPLIANCE

The design documentation as referred to in this report has been assessed against the applicable provisions of the BCA2019 as outlined in Part 1.2 of this report and it is considered that such documentation complies or is capable of complying (as outlined in Part 3 of this Report) with those documents.

## ANNEXURE A - DESIGN DOCUMENTATION

This report has been based on the following design documentation.

Table 4. Architectural Plans

Architectural Plans Prepared by Glendenning Szoboszlay		
Drawing Number	Revision	Title
A-0000	01	Cover Sheet
A-0200	01	Existing Ground Floor Plan
A-0201	01	Existing First Floor Plan
A-0202	01	Existing Roof Plan
A-0400	01	Site Analysis Plan
A-0401	02	Proposed Site Plan
A-0500	02	Stage 1 Environmental Site Management Plan
A-0501	02	Stage 2 Environmental Site Management Plan
A-0502	02	Stage 3 Environmental Site Management Plan
A-1100	04	Overall Ground Floor GA Plan
A-1101	03	Overall First Floor GA Plan
A-1102	03	Ground Floor GA Plan 1
A-1103	03	Ground Floor GA Plan 2
A-1104	03	First Floor GA Plan 1
A-1105	03	First Floor GA Plan 2
A-1106	03	Roof GA Plan
A-1300	02	GA Elevations 1
A-1301	02	GA Elevations 2
A-1302	02	GA Elevations 3
A-9000	02	Shadow Diagrams June 21
A-9001	02	Shadow Diagrams December 21
A-9002	02	Vertical Shadow Analysis
A-9300	02	Materials Board
A-9301	01	Perspectives 1
A-9302	01	Perspectives 2
A-9303	01	Perspectives 3

## ANNEXURE B – DESIGN SPECIFICATION

Further due to the level of detail provided at this stage the following items are to form part of a design statement or specification, prior to Construction Certificate:

### General

1. Tactile ground surface indicators will be installed at the top and bottom of stairways / ramps (other than fire isolated stairways / ramps); and where an overhead obstruction is less than 2 metres above the floor level. Tactile ground surface indicators will comply with Sections 1 and 2 of AS1428.4.1.
2. On an accessway where there is no chair rail, handrail or transom, all frameless or fully glazed doors, sidelights or glazing capable of being mistaken for a doorway or opening will be clearly marked and comply with Clause 6.6 of AS1428.1-2009. A solid non-transparent contrasting line not less than 75mm wide is to extend across the full width of the glazing panel. The lower edge of the contrasting line is to be located between 900-1000mm above the plane of the finished floor level. The contrasting line is to provide a minimum of 30% luminance contrast when viewed against the floor surface or surfaces within 2 metres of the glazing on the opposite side.
3. All doorways will have a minimum luminance contrast of 30% in accordance with Clause 13.1 of AS1428.1-2009.
4. Fixtures and fittings in accessible sanitary facilities will be provided and installed in accordance Clause 15 of AS1428.1-2009.
5. Fixtures and fittings in ambulant facilities will be provided and installed in accordance Clause 16 of AS1428.1-2009.
6. Walkways will comply with Clause 10 of AS1428.1-2009.
7. For the walkways, the floor or ground surface abutting the sides of the walkway will be firm and level of a different material to that of the walkway at the same level and follow the grade of the walkway and extend horizontally for a minimum of 600mm, or be provided with a kerb or kerb rail in accordance with Clause 10.2 of AS1428.1-2009.
8. Stairways will comply with Clause 11 of AS1428.1-2009.
9. Handrails will comply with Clause 12 of AS1428.1-2009.
10. Grabrails will comply with Clause 17 of AS1428.1-2009.
11. Accessible car spaces will achieve compliant headroom clearances in accordance with Clause 2.4 of AS2890.6-2009.
12. Demarcation will be provided in the accessible car space and adjacent shared zone in accordance with Clause 3.1 and 3.2 of AS2890.6. Refer to Annexure B1 for a diagrammatic explanation.
13. Bollards will be provided in the shared disabled car space area in accordance with Clause 2.2.1(e) of AS2890.6-2009. Refer to Annexure B1 for a diagrammatic explanation.
14. Switches and power points will comply with Clause 14 of AS1428.1-2009.
15. Floor and ground floor surfaces on accessible paths and circulation spaces including the external areas will comply with Clause 7 of AS1428.1-2009. Any level difference over 3mm must be ramped according AS1428.1 Clause 10.5.
16. Braille and tactile signage will comply with BCA2019 Clause D3.6.
17. Signage will to comply with Clause 8 of AS1428.1-2009.
18. The passenger lifts will comply with BCA2019 Table E3.6b and AS1735.12.
19. The unobstructed height of a continuous accessible path of travel will be a minimum of 2000mm and 1980mm at doorways.
20. Door handles and the like, will be in accordance with Clause 13.5 of AS1428.1-2009.