



Centuria Capital Limited
Warehouse and Office

88 Newton Road, Wetherill
Park NSW

Access Review

(Job Number 00742)


18 April 2024




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This Report was Prepared by:

And checked by:

DocuSigned by:

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DocuSigned by:

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Evan O'Hanlon OAM PLY
Access Consultant
Morris Godding Access Consulting

Anthony Leuzzi
Associate Director
Morris Godding Access Consulting



Table of contents

1. Executive Summary	4
2. Introduction	5
2.1 Background	5
2.2 Objectives	5
2.3 Limitations	5
2.4 Accessibility of Design	6
2.5 Statutory Requirements	6
3. General Access Planning Considerations	7
4. Ingress & Egress	8
4.1 External Linkages	8
4.2 Entrances	9
4.3 Emergency Egress	10
5. Paths of Travel	11
5.1 Circulation Areas	11
5.2 Passenger Lifts	11
5.3 Stairs & Ramps	12
9. Facilities & Amenities	12
9.1 Sanitary Facilities	12
9.2 Common Areas	13
9.3 Car Parking	13
10. Conclusion	14



1. Executive Summary

The Access Review Report is a key element in the design development of the Warehouse and ancillary office located at 88 Newton Road, Wetherill Park NSW, 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 support the Development Application prepared by Centuria and detail how the proposal complies with the relevant access requirements. The report will 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

Centuria Capital Limited has engaged Morris-Goding Accessibility Consulting, to provide a design review of the proposed warehouse and ancillary office space, located at 88 Newton Road, Wetherill Park NSW. The works consists of demolition of existing buildings and structures, construction and operational use of a single-storey warehouse and distribution centre with ancillary office space and amenities, on-site parking, landscaping and access, and other associated works including bulk earthworks, site preparation works and site clearance, as well as augmentation and construction of servicing utilities. The proposed development falls under a number of BCA classifications including:

- Class 5 (commercial / office)
- Class 7a (carpark)

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, 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, 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 2022 (BCA) Part D4, F4, 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);

Fairfield City Wide Development Control Plan 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 (EREOC)
- Advisory Note February 2013 on streetscape, public, outdoor areas, fixtures, fittings and furniture;



- AS1428.2:1992 Enhanced and Additional requirements;
- 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 and 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

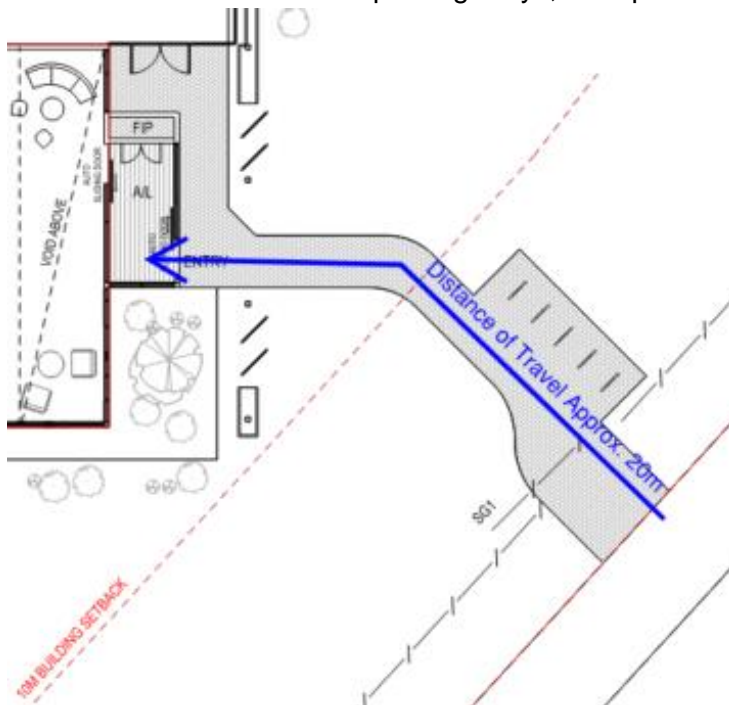
- Principle 2: Flexibility in Use
- Principle 3: Simple and Intuitive Use
- Principle 4: Perceptible Information
- Principle 5: Tolerance for Error
- Principle 6: Low Physical Effort
- Principle 7: Size and Space for Approach and use

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

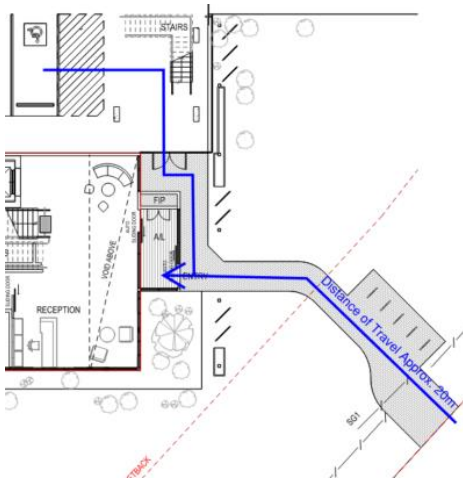
MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements. An accessible path of travel is evident in the drawings from the site boundary to the building entrance on the ground floor and from the accessible parking spaces noted.

Based on 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.

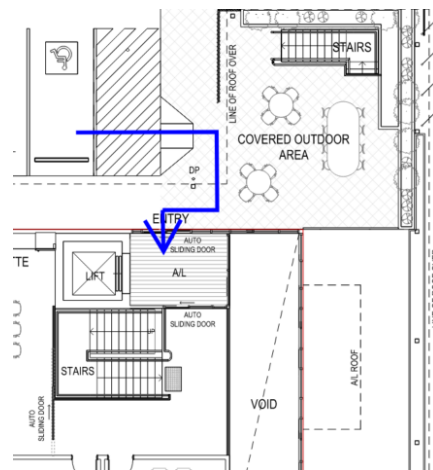
4.2 Entrances

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 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. 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.



Ground Floor External Linkage



Level One External Linkage



Assessment

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements. The Main entrance on the ground floor is located adjacent to the accessible parking provided on that level and provides entry to the main lobby area. The level one entry is located adjacent to the accessible parking provided on that level. Both have direct access to the passenger lift.

Based on 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 2022 Part D3D22 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 current configuration of stairs suggests the spatial requirements would not be incorporated without layout amendments, but if provided with future design development these 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.
- Alternative evacuation means eg. 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.

Assessment



The above are recommendations only and are noted only for consideration during further design work. Noting this, based on the current level of detail all access requirements appear capable of achieving compliance.

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 D4D5) 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

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

A single passenger lift is provided within the office areas and provides access from ground floor to the first floor. There is level access from the office entrance level on ground floor to the warehouse. There is accessible connection from the office on 1st floor to the warehouse level on 1st floor.

There are continuous accessible paths of travel throughout the office and warehouse levels in accordance with DDA Premises Standards.

Based on 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 2022 Part E3D7, E3D8, DDA Access Code 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. Based on 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

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:

- 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

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

There are numerous external stairs leading from exits to the site boundary. There are common use stairs within the office areas that provide connection between office levels.

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. Facilities & Amenities

6.1 Sanitary Facilities

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

- For Class 5, and 7: Provide at least 1 unisex accessible toilet, adjacent to every bank of toilets (where provided) on each storey, compliant with AS1428.1 under DDA Access Code part F2.4(BCA 2022 F4D5, F4D6, F4D7). If more than 1 toilet bank provided on each level, accessible toilet is required at 50% min. of toilet banks at each level.
- An even number of left hand (LH) and right hand (RH) transfer WC pans (accessible toilets) is required within the building. Alternating LH/RH layouts on each subsequent level is the most appropriate and inclusive approach.
- Accessible WC requires 2300mm x 1900mm around the pan with the basin to sit outside this area in accordance with AS1428.1.



- An ambulant cubicle is required within every standard toilet bank adjacent to an accessible toilet under DDA Access Code Part F2.4 (BCA 2022 F4D5, F4D6, F4D7) compliant with AS1428.1:2009.

Assessment

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

The Dock Office contains both a Male and Female toilet that include an ambulant cubicle. A AWC sized facility is also provided nearby. The Client has confirmed that this is not an accessible facility, and no accessible pathway has been provided to the facility.

Each office level (ground, and 1st floor) have a bank of male and female toilets with adjacent accessible WC. The accessible WCs have sufficient circulation areas of pan, basin and shower in accordance with AS1428.1. Both a left-hand and right-hand facility has been provided on alternating levels.

All banks of male and female toilets in office have ambulant cubicles in accordance with AS1428.1.

Based on 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 Common Areas

The BCA and DDA Premises Standards contain requirements for common use areas suitable for the use of persons with disabilities. In relation to the proposed building, these requirements can be summarised as follows:

- Accessibility is required to common use courtyards within buildings
- Wheelchair access is required to any external and outdoor terrace areas including roof terraces compliant with AS1428.1.

Assessment

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements. There are a number of common areas on both levels of the office area that include both inside and outside spaces. All are currently accessible.

Based on 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.

6.3 Car Parking

The BCA and DDA Premises Standards contain requirements for parking which are applicable to this project. In relation to the proposed building, these requirements can be summarised as follows:



- Class 5 and Class 7 developments: Provide 1 accessible car bay for every 100 car bays or part thereof, compliant with AS2890.6.
- 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.
- 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).

Assessment

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

There are currently 2 accessible car bays provided within the development.

- 1 accessible car bay, ground floor
- 1 accessible car bay, mezzanine deck carpark close to the lift lobby

Whilst the proposed Accessible car bays have suitable shared zone and circulation areas in accordance with AS2890.6. The number of spaces does not meet BCA and DDA Premises Standards requirements noted above as 1 for every 100 spaces or part thereof. However, It has been noted by the client that the number of spaces has been deemed acceptable by the certifier.

Based on 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. Conclusion

MGAC has assessed the proposed scheme for the Warehouse and office space located at 88 Newton Road, Wetherill Park NSW. The proposed drawings indicate that accessibility requirements, pertaining to external site linkages, building access, common area access, sanitary facilities 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.