

DA Access Report

Date of Report: 31 March 2020

Amendment A: 27 April 2020

Re: 50 Lawrence St Freshwater

For: Lawrence Street Nominees Pty Ltd c/- CKDS Architecture

Assessment: Plans by CKDS Architecture

Project Number 19045

Drawing Numbers DA-1101 (Issue E, 21/04/2020), DA-1102 – DA-1105
(Issue B, 20/03/2020)

This Access Report is an assessment of the proposed building to demonstrate consideration of access for people with a disability for the development application submission.

The following comments are based on access and adaptable housing requirements of the Building Code of Australia 2019 (BCA), Disability (Access to Premises – Buildings) Standards 2010 (including Amendment No. 1) (Premises Standards), Warringah Development Control Plan (DCP), Australian Standards (AS) and Disability Discrimination Act (DDA) and the Livable Housing Design Guidelines (4th Edition) as referenced by State Environmental Planning Policy No 65 – Design Quality of Residential Apartment Development (SEPP 65) and its associated Apartment Design Guide.

This report contains comments regarding issues of non-compliance, or identifying where insufficient information has been provided for an assessment to be made. Recommendations may also be made to enhance accessibility and minimise the risk of action under the Disability Discrimination Act (DDA).

Unless otherwise specified, all Australian Standards references are from the following:

- AS 1428.1-2009 (including Amendment No. 1)
- AS/NZS 1428.4.1-2009 (including Amendment No. 1)
- AS 1735.12-1999
- AS/NZS 2890.6-2009

Access elements	Reference	Assessment
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1. Access requirements

1.1 Access for people with a disability is required:

- a) From the main points of a pedestrian entry at the allotment boundary. *BCA D3.2 a*
- b) From accessible car parking on the site. *BCA D3.2 a*
- c) Through the principal pedestrian entrance of commercial tenancies, the residential lift lobby on ground level and the level 1 residential entrance. *BCA D3.2 b*
- d) To the entrance of each residential sole-occupancy unit. *BCA Table D3.1*
- e) To and within each type of room or space for use in common by the residents, including the residential waste room. *BCA Table D3.1*
- f) To and within all areas of the commercial spaces normally used by the occupants. *BCA Table D3.1*

1.2 It is not necessary to provide access for people with a disability to or within an area where access would be inappropriate because of the particular purpose for which the area is used and/or an area that would pose a health or safety risk for people with a disability. *BCA D3.4*

It is typically not considered necessary to provide access to and within areas such as the commercial kitchen, store rooms and the pump/hydrant room as it is anticipated that the duties of staff in these areas will require physical capabilities. We note that a person with a disability (ie a wheelchair user) may have the abilities required to fulfill certain duties and DDA action may be taken if facilities are not accessible. It is therefore recommended that accessible features be incorporated where practicable (eg doorways, flush transitions and circulation/turning spaces). We further recommend that the employer consider DDA risk in their policies, procedures and position descriptions as it is unlawful to discriminate against people with a disability in employment.

Access elements	Reference	Assessment
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| <p>1.3 Adaptable housing is prescribed by the Warringah DCP. Based on this development containing 11 units, the total number of adaptable units required will be 2.</p> | <p><i>DCP D18</i>
9</p> | |
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Plans show that this will consist of unit 2 and unit 5. The designs of the nominated adaptable units have been refined and assessed against the Class C requirements of AS 4299 in this report.

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| <p>1.4 State Environmental Planning Policy No 65-Design Quality of Residential Apartment Development (SEPP 65) requires that the Apartment Design Guide be considered in the determination for development consent. Clause 4Q of the Apartment Design Guide requires that universal design features be included in apartment design and suggests that 20% of the dwellings be designed to meet the silver level of the Livable Housing Design Guidelines. Therefore, 3 of the 11 units are required to be assessed against these guidelines. Units 2 and 5 have been assessed as silver units (also being adaptable). The car park for unit 4 indicates this is the third silver unit.</p> | | |
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2. Continuous accessible path of travel

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| <p>2.1 The continuous accessible path of travel to and within areas required to be accessible is to comply with AS 1428.1. This is achievable subject to assessment of specific dimensions and features which are not fully detailed on the plans at this early stage of design such as flush transitions between floor surfaces and a maximum 1:40 gradient/crossfall to circulation spaces. The connection from the café to the car parking and accessible sanitary facility will require some design refinement to incorporate suitable door circulation spaces.</p> | <p><i>AS 1428.1</i>
7.2
<i>Fig. 6, 7</i>
13.3.1
<i>Appendix C</i></p> | <p>Confirm for
CC</p> |
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3. Approaches and entrances

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| <p>3.1 In the absence of any ramp or stairs shown for the approaches to the four nominated entrances, they are anticipated to have a gradient not steeper than 1:40 and therefore be accessible. Where this varies on site, CC plans are to show further details of the accessible approach and demonstrate compliance with AS 1428.1.</p> | <p><i>BCA D3.2</i>
<i>a i, b</i></p> | <p>Confirm for
CC</p> |
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Comment:

The approach to the level 1 residential entrance is shown with a maximum gradient of 1:20. This is to reduce to maximum 1:40 at the doorway for a length of 1450mm, appropriate to door circulation space.

Access elements	Reference	Assessment
<p>3.2 A ramp is shown inside the level 1 residential entrance. This is to comply with AS 1428.1 and plans are to be provided at CC stage showing details and dimensions, including a gradient no steeper than 1:14, landings appropriate to the gradient and angle of approach, handrails and kerbs/kerbrails on both sides and tactile ground surface indicators at the top and bottom. The BCA requires that the slip-resistance of this ramp be tested in accordance with AS 4586 and comply with BCA Table D2.14.</p>	<p><i>BCA D3.3 a Table D2.14 D2.10 c AS 1428.1 10</i></p>	<p>As shown/ scaled from plans/ confirm for CC</p>
<p>3.3 A 1:20 walkway is shown within the café to provide an internal connection to car parking and the accessible sanitary facility. In the current configuration, the door at the bottom of the walkway lacks a landing of 1450mm length and latch side circulation space. This area should be subject to design refinement to ensure accessibility compliance will be achieved.</p>	<p><i>AS 1428.1 13.3</i></p>	<p>Confirm/ amend for CC</p>
<p>3.4 Stairs are shown to the commercial kitchen, the pump/hydrant room, and externally between levels 1 and 2. They are also shown internally for emergency egress.</p> <p style="margin-left: 20px;">a) All stairs which are not fire isolated are to have accessible features complying with AS 1428.1, including: opaque risers, sharp nosing profile, non-slip contrasting edge strips, handrails on both sides and tactile ground surface indicators at the top and bottom.</p> <p style="margin-left: 20px;">b) All fire isolated stairs are to have contrasting non-slip edge strips in accordance with AS 1428.1 and handrails are to comply with Clause 12 of AS 1428.1 (note that this may require offset treads at intermediate landings to allow for a continuous handrail at a consistent height). The BCA requires slip-resistance of stair treads and landings or their nosing strips to be tested in accordance with AS 4586 and comply with BCA Table D2.14.</p>	<p><i>BCA D3.3 a Table D2.14 D2.13 a v D2.14 a ii AS 1428.1 11.1</i></p>	<p>Confirm for CC</p> <p>Confirm for CC</p>

4. Doorways

<p>4.1 Doorways in common and commercial areas, and the entrance doors to adaptable units, are required to have a minimum clear opening width of 850mm (at least one leaf of multiple leaf doors is to meet this requirement). Doorways are not fully detailed on the plans at this early stage of design and CC plans are to demonstrate compliance. Features such as luminance contrast to the doors or frames, opening force of the doors, level or ramped thresholds, glazing identification and door hardware are to comply with AS 1428.1.</p>	<p><i>BCA D3.2 e AS 1428.1 13</i></p>	<p>Confirm for CC</p>
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Access elements	Reference	Assessment
<p>4.2 Circulation space is required at each door with a maximum gradient and crossfall of 1:40. Dimensions are to be confirmed on site to ensure minimum clearances, which vary depending on the direction of approach and clear width of the door, achieve compliance with AS 1428.1. Note that dimensions are to be clear of the finished surface (eg wall/skirting) or any other obstruction (eg fire equipment) and are minimum dimensions. Plans were scaled where dimensions are not shown and circulation spaces were generally found to be in accordance with AS 1428.1 (refer to comments for exceptions).</p>	<p>AS 1428.1 13.3</p>	<p>As scaled from plans</p>

Comment:

- a) The door at the bottom of the 1:20 walkway in the café lacks a 1450mm long landing and latch side circulation space. Design refinement of this area will be required prior to CC.
- b) A second door is shown from the business tenancy to connect to the car park which lacks latch side circulation space for re-entry to the tenancy. However, as this is a second door, it may be acceptable, subject to confirmation of tenancy fitout details.

5. Lifts

<p>5.1 A passenger lift is proposed to provide an accessible path of travel for vertical circulation. This is to comply with BCA E3.6 including minimum floor dimensions of 1100mm x 1400mm (for lifts which travel less than 12m). Note that the BCA may prescribe requirements in relation to accommodating a stretcher in addition to elements required for access for people with a disability.</p>	<p>BCA E3.6</p>	<p>Confirm for CC</p>
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Plans are to show further details for assessment at CC stage and certification is to be obtained from the lift supplier regarding compliance with BCA E3.6.

6. Switches and controls

<p>6.1 Switches and controls (except general purpose outlets) are to be placed at a height between 900-1100mm and at least 500mm from an internal corner. This includes the operable component of any intercom entry system.</p>	<p>AS 1428.1 14.1</p>	<p>Confirm for CC</p>
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	Access elements	Reference	Assessment
6.2	Rocker action and toggle switches are to be provided in the accessible sanitary facility and are to have minimum dimensions 30mm x 30mm.	AS 1428.1 14.2	Confirm for CC
6.3	General purpose outlets in the accessible sanitary facility are to be located at a height between 600-1100mm and at least 500mm from an internal corner.	AS 1428.1 14.2	Confirm for CC

7. Sanitary facilities

7.1	An accessible sanitary facility is shown to satisfy BCA F2.4. This is to comply with AS 1428.1 and a scaled assessment indicates that WC circulation space of 1900mm x 2300mm is achievable, subject to detailed review at CC stage. Fixtures and fittings, including the WC pan, WC seat, backrest, toilet paper dispenser, sink, shelf, soap dispenser, mirror, clothes hook, grabrails and door hardware, are to comply with AS 1428.1 and CC plans are to demonstrate compliance.	BCA Table F2.4 a	Confirm for CC
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8. Signage

8.1	Signage is required as follows:		
a)	The unisex accessible sanitary facility is to be identified by Braille and tactile signage which incorporates the international symbol of access, male and female symbols and identifying if the facility is for left or right handed use.	BCA D3.6 c AS 1428.1 8.1 a i, ii	Confirm for CC
b)	Each door required by BCA E4.5 to be provided with an exit sign (not limited to fire-isolated stair doors only) is to be identified by Braille and tactile signage complying with BCA Specification D3.6. These are to state 'Exit' and 'Level' followed by the floor level number and be located in accordance with BCA Specification D3.6. (Consideration should be given to the practicality of installing exit signage at any glazed doors or double leaf doors, as installation locations specified by the BCA do not offer guidance for such scenarios.)	BCA D3.6 a ii	Confirm for CC

Access elements	Reference	Assessment
9. Adaptable Units		
<p>9.1 The adaptable housing provisions require that internal doorway circulation spaces be capable of compliance upon adaptation. A scaled assessment indicates that compliance with circulation space requirements will generally be in accordance with AS 1428.1 upon adaptation.</p> <p>Comment: The adapted bathroom doors for both units are shown with insufficient latch side circulation space. However, as this may be an adaptable element, compliance is considered to be readily achievable.</p>	AS 4299 4.3.7	As scaled from plans
<p>9.2 Internal doors for adaptable units are to have a minimum clear width of 820mm. Generally this can be an adaptable element, with the exception of the visitable WC which is to comply in the pre-adapted construction. CC plans are to incorporate minimum 870mm door leaves for this purpose.</p>	AS 4299 4.3.3	Confirm for CC
<p>9.3 The adaptable units are to have a minimum bedroom width to provide 1m clearance on each side of a queen bed and at least 1540mm x 2070mm for turning space at the foot of the bed (or at one side) with additional space for a wardrobe. A scaled assessment indicates that this will be achievable in the main bedroom of each adaptable unit.</p>	AS 4299 4.6.1	As scaled from plans
<p>9.4 The living/dining area in each adaptable unit is to have at least 2250mm clear of furniture. The open plan designs are conducive to this, however, will be impacted by an occupant's furniture layout.</p>	AS 4299 4.7.1	As scaled from plans
<p>9.5 The kitchen in each adaptable unit is to have at least 1550mm clearance in front of the kitchen bench. A scaled assessment indicates this will be achievable upon adaptation. Where this involves relocation of the sink, the inclusion of secondary plumbing is to be confirmed with the hydraulic consultant.</p> <p>Other Class C features of AS 4299 are to be incorporated during reconfiguration and adaptation work and will be intended to meet the needs of the occupants. Floor finishes are to be slip-resistant and continuous beneath kitchen joinery to enable removal of cabinets or replacement/relocation of joinery for adaptation.</p>	AS 4299 4.5.2 4.5.4	As scaled from plans/ confirm hydraulics
<p>9.6 The laundry in each adaptable unit is to have at least 1550mm clearance in front of or beside appliances and a scaled assessment indicates the adapted designs will achieve this upon adaptation. There is to be provision for an automatic washing machine and a slip resistant floor surface.</p>	AS 4299 4.8 4.9.1	As scaled from plans

Access elements	Reference	Assessment
9.7 Where a clothes line is provided, an accessible path of travel is to be provided between laundry and clothesline.	AS 4299 4.8(a)	Confirm for CC
9.8 Letterboxes are to be located on a hard standing area which is to be connected to an accessible pathway.	AS 4299 3.8	Confirm for CC
9.9 While storage lockers are not addressed by AS 4299, it is recommended that the lockers allocated to adaptable units are connected to an accessible pathway.		Consider DDA risk
9.10 The bathroom in each adaptable unit is to be capable of complying with AS 1428.1 in the future. They are to incorporate the following features:		
a) Minimum room size conducive to AS 1428.1 circulation space requirements.	AS 4299 4.4.1	As scaled from plans
b) A hobless shower recess with the shower screen able to be easily removed.	AS 4299 4.4.4 f	Confirm for CC
c) A recessed soap holder.	AS 4299 4.4.4 f	Confirm for CC
d) A slip-resistant floor surface.	AS 4299 4.4.2	Confirm for CC
e) Shower taps able to be positioned in accordance with AS 1428.1.	AS 4299 4.4.4 f	Confirm for CC
f) Provision for an adjustable, detachable hand held shower rose.	AS 4299 4.4.4 h	Confirm for CC
g) Provision for a grabrail and folding seat in the shower to comply with AS 1428.1 through reinforced walls.	AS 4299 4.4.4 f Fig. 4.6	Confirm for CC
Comment: It is strongly recommended that wall reinforcing consist of 12mm structural ply to the entire walls surrounding the shower, given the potential for error in aiming for compliance with AS 4299 Figure 4.6.		
h) Tap sets to be capstan or lever handles with a single outlet.	AS 4299 4.4.4 c	Adaptable element
i) Provision for a washbasin with clearances to comply with AS 1428.1.	AS 4299 4.4.4 g	Confirm for CC

Access elements	Reference	Assessment
9.11 The toilet for each adaptable unit is to be capable of complying with AS 1428.1 in the future. They are to incorporate the following features:	AS 4299 4.4.1	
a) The WC pan located at correct distances from fixed walls.	AS 4299 4.4.3	Confirm for CC
b) Provision for grab rails through reinforced walls.	AS 4299 4.4.4 h Fig. 4.5	Confirm for CC
Comment: It is strongly recommended that wall reinforcing consist of 12mm structural ply to the entire walls surrounding the toilet, given the potential for error in aiming for compliance with AS 4299 Figure 4.5.		
c) Slip resistant floor surface.	AS 4299 4.4.2	Confirm for CC
d) Minimum circulation space of 900mm x 1250mm in front of the WC pan clear of any door swing or obstruction in the initial construction.	AS 4299 4.4.3 Fig. 1.1	As scaled from plans
Comment: Flush floor transitions are required for the path of travel to the visitable WC in the pre-adapted construction.		Confirm for CC

10. Universal design

10.1 The livable unit plans have been assessed against the silver level requirements of the Livable Housing Design Guidelines (LHDG) as prescribed by the SEPP 65 Apartment Design Guide. A scaled assessment indicates that compliance will generally be achievable subject to confirmation of elements not shown on plans at this early stage of design, including the elements outlined in the remainder of this section of this report.

10.2 Dwelling entrance

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| a) A level landing area of at least 1200mm x 1200mm is required on the arrival side of the entrance door (i.e. the external side). | LHDG 2.b | As scaled
from plans |
| b) Reasonable shelter from the weather is to be provided at this entrance. Where the entrance is not located inside a building, cover should be provided over the entire landing mentioned above. | LHDG
2.a.iii | Achievable |

Access elements	Reference	Assessment
c) An entrance door is to have a minimum clear opening width of 820mm (note that the adaptable housing requirement supercedes this).	<i>LHDG 2.a.i</i> <i>Fig. 2(a)</i>	Confirm for CC
d) A level (step-free) transition and threshold is required. A maximum vertical tolerance of 5mm between abutting surfaces is allowable provided the lip is rounded or bevelled.	<i>LHDG 2.a.ii</i>	Confirm for CC
e) A ramped threshold may be provided at the entrance where the threshold is between 5mm and 56mm.	<i>LHDG 2.c</i>	Confirm for CC

10.3 Internal doors and corridors

a) Doorways to rooms on the entry level used for living, dining, bedroom, bathroom, kitchen, laundry and sanitary compartment purposes are to have a minimum clear opening width of 820mm.	<i>LHDG 3.a.i</i>	Confirm for CC
b) A level (step-free) transition and threshold is required at these doorways. A maximum vertical tolerance of 5mm between abutting surfaces is allowable provided the lip is rounded or bevelled.	<i>LHDG 3.a.ii</i>	Confirm for CC
c) Internal corridors to the doorways referred to above are to have a minimum clear width of 1000mm. On completion, 1000mm clearance is required between skirtings or the narrowest point. Note that corridors which scale at exactly 1000mm will not have any construction tolerance.	<i>LHDG 3.b</i>	As scaled from plans/ confirm for CC

10.4 Toilet

a) A toilet is to be provided on ground or entry level with a minimum 900mm x 1200mm circulation space in front of the WC pan clear of the door swing (note that the adaptable housing requirement supercedes this).	<i>LHDG 4.a.i, ii</i> <i>Figs. 3(a), 3(b)</i>	As scaled from plans
b) This toilet pan is to be located in a corner of the room adjacent to a wall that extends 600-1000mm in front of the WC pan, to allow for wall reinforcing in accordance with Figures 6a or 6b of the LHDG as outlined in section 10.6 of this report, for the future installation of grab rails.	<i>LHDG 4.a.iii</i>	As scaled from plans

10.5 Shower

a) One bathroom is to feature a slip resistant, hobless shower recess. Shower screens are permitted provided they can be easily removed at a later date.	<i>LHDG 5.a</i>	Confirm for CC
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Access elements	Reference	Assessment
b) This shower recess is to be located in a corner of the room to enable the installation of grabrails at a future date in accordance with Figures 8(a) or 8(b) of the LHDG as outlined in section 10.6 of this report.	<i>LHDG 5.b</i>	As scaled from plans
10.6 Reinforcement of bathroom & toilet walls		
a) Except for walls constructed of solid masonry or concrete, the walls around the shower and toilet should be reinforced to provide a fixing surface for the safe installation of grabrails.	<i>LHDG 6.a</i>	Confirm for CC
b) The walls around the toilet and shower recess are to be reinforced by installing:		Confirm for CC
i. Noggings with a thickness of at least 25mm in accordance with Fig. 6a and 8a of LHDG; or	<i>LHDG 6.b.i, 6.d.i</i>	
ii. Sheeting with a thickness of at least 12mm in accordance with Fig. 6b and 8b of LHDG.	<i>LHDG 6.b.ii, 6.d.ii</i>	

Comment:

It is strongly recommended that wall reinforcing consist of 12mm structural ply to the entire walls surrounding the shower and toilet given the potential for error in aiming for compliance with LHDG Figures 6a or 6b and 8a or 8b.

11. Car parking

11.1	As car parking is allocated to commercial use, an accessible car park will be required to satisfy BCA Table D3.5. It is to comply with AS 2890.6. Plans showing further details are to be assessed at CC stage to confirm compliance including:	<i>BCA D3.5 c Table D3.5</i>	Confirm for CC
	a) A firm plane surface with a maximum cross fall of 1:40 (1:33 if of a bitumen surface and outdoors) for the accessible car parks and associated shared areas.	<i>AS 2890.6 2.3</i>	Confirm for CC
	b) Minimum dimensions of 2400mm wide x 5400mm long.	<i>AS 2890.6 2.2.1 a</i>	Confirm for CC
	c) A shared area adjacent to the car parking space with minimum dimensions of 2400mm wide x 5400mm long and a bollard located in accordance with AS 2890.6.	<i>AS 2890.6 2.2.1 b e Fig. 2.2, 2.3</i>	Confirm for CC

Access elements	Reference	Assessment
d) A shared area is also required at one end of the car parking space with minimum dimensions of 2400mm x 2400mm. This may be located within a trafficked area and is not required to be line marked.	AS 2890.6 2.2.1 c Fig. 2.2, 2.3	Confirm for CC
e) Minimum headroom of 2500mm is required above the accessible car parking space and the associated shared areas. The vehicular path of travel to the accessible spaces is to have minimum vertical clearance of 2200mm.	AS 2890.6 2.4 Fig. 2.7	Confirm for CC
f) Signage is required to designate accessible car parking spaces for the use of people with a disability. The international symbol of access (white symbol on blue background) is to be placed as a pavement marking in accordance with AS 2890.6.	BCA D3.5 d AS 2890.6 3.1	Confirm for CC
g) Yellow, slip-resistant pavement markings are to identify dedicated parking spaces and shared areas. Shared areas are to be marked with diagonal lines complying with AS 2890.6.	AS 2890.6 3.2 3.2 b ii	Confirm for CC
11.2 Plans indicate that 2 car parking spaces will be allocated to the adaptable units. AS 4299 requires that these have a minimum width of 3.8m and this is shown on the plans	AS 4299 3.7.2 BCA D3.5 c	As shown on plans

Conclusion

Access will need to comply with the elements identified in this report.

Generally, the plans assessed show that compliance with requirements for accessibility, adaptable housing and livable housing is achievable subject to incorporation of specific details. Full details are not shown at this early stage of design and plans showing more details and dimensions are to confirm compliance at CC stage. Requirements and recommendations to achieve compliance with the accessibility provisions of the Premises Standards, Building Code of Australia, referenced Australian Standards, DCP adaptable housing provisions and SEPP 65 universal design provisions, and to minimise the risk of action under the Disability Discrimination Act, have been explained in this report.

Reference numbers are provided for clarification of comments within this report. Alternatively, the undersigned may be contacted on the details below for further clarification.

Report prepared by:

A handwritten signature in black ink that reads 'Aja Goddard'.

Aja Goddard
Access Consultant
ACAA Accredited Member 243

Reasonable care and skill have been exercised in the assessment of the building and the preparation of this report. However, this report shall not be construed as relieving any other party of their responsibilities or obligations.

The advice given is based on the assessment of the plans and other relevant documentation supplied regarding access requirements in the BCA, Australian Standards, Premises Standards and Disability Discrimination Act current at the time. The advice relates specifically to this project and may not apply to any other building or to this building at any other point in time.