



**ABSOLUTE**  
BCA | ACCESS

# ACCESSIBILITY COMPLIANCE ASSESSEMENT REPORT

## North Narrabeen Surf Life Saving Club Alterations and Additions to existing building

Report Number	A23_03_Access	
Revision Number	Stage	Date of Issue
01	Draft issue	13.07.2023
02	Issue for DA	24.11.2023
03	Issue for S4.55	04.03.2025

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## 1.0 Introduction & Report Basis

Absolute BCA & Accessibility has been engaged by Northern Beaches Council to prepare this Accessibility compliance assessment report for the proposed alterations and additions to the existing North Narrabeen Surf Life Saving Club.

*This report assesses the proposed S4.55 modification application plans (refer to Drawing List on DA00 Issue E dated Feb25).*

The purpose of this report is to provide:

1. A high-level assessment of the proposed design/building against the requirements relating to 'access for people with a disability' (See Section 1.2 below); and
2. Recommendations to address any identified significant design issues. Refer to Section 4.0

### 1.1 Assessed Information

The following information was specifically relied upon for this assessment:

Document Type	Prepared by	Reference or Revision Number
Architectural Plans	Northern Beaches Council	Northern Beaches Council Issue E S4.55 mod application (Feb2025)

### 1.2 Accessibility Requirements (Relevant Codes and Legislation)

#### NCC BCA 2022

The following clauses of the BCA (directly relevant to accessibility)

- Part D4 "Access for People with Disabilities" – this part contains general accessibility requirements for all types of buildings.
- Part E3 "Lift Installations" – this part specifies lift types, sizes and features required in all buildings.
- Part F4 "Sanitary & Other Facilities" – this part includes requirements for sanitary facilities, including numbers vs populations, and accessible and ambulant facilities.

#### Australian Standards (limited to parts specifically referenced by the BCA)

- AS1428.1-2001/2009 "Design for Access and Mobility – Part 1: General Requirements for Access New Building Works"
- AS1428.4-1992 "Design for Access & Mobility – Part 4 Tactile Ground Surface Indicators for Orientation of People with Visual Impairment"

- AS1428.4.1-2009 "Design for Access & Mobility–Part 4.1 Means to Assist the Orientation of People with Vision Impairment – Tactile Ground Surface Indicators"
- AS1735.12-1999 "Lifts, Escalators & Moving Walkways – Part 12 – Facilities for Persons with Disabilities"
- AS2890.6-2009 "Parking Facilities - Off Street Parking for People with Disabilities"

### Disability (Access to Premises Buildings) Standards 2010 – "The Premises Standard"

The Disability (Access to Premises – Buildings) Standards 2010 (Premises Standards) is legislated under the Disability Discrimination Act 1992. This requires new works in applicable premises to comply with the accessibility requirements of the standard (& corresponding BCA requirements).

Note that in existing buildings, the premises standards can require the 'affected part' to comply (in addition to the 'new works' – this may necessitate upgrade works beyond the typical scope of the 'new works'.

Some exemptions are provided for existing lifts and toilets .

### The Disability Discrimination Act 1992 ("DDA")

The DDA is a complaints-based piece of legislation that seeks to eliminate discrimination, 'as far as possible', against people with disabilities.

It should be noted that the DDA does not contain prescriptive or specific design requirements (refer to the Premises Standards for this purpose).

## 1.3 Assumptions, Limitations & Exclusions

- This report is intended to support the Development Application (or similar) stage design and identifies significant design issues only. For the purposes of this report, significant design issues are:
  - Non-compliance with DTS provisions that would likely necessitate significant changes alterations to the current plans (changes which would be expected to necessitate a \$4.55 if carried out post Consent).
  - Non-compliance with DTS provisions that would likely necessitate the development of a Performance Solution. It is noted that some Performance Solutions will necessitate design change. It is the applicant's responsibility to confirm the extent of required design changes with the author of any proposed Performance Solution
- The Report only assesses the information specifically referenced in Section 1.1 of this report. This information is accepted in good faith as accurate and correct.
- No assessment has been made of any existing BCA Performance Solution based Reports that may apply to the base building or development, unless otherwise specifically noted.

- In terms of development within existing buildings (or adjacent to existing buildings), it must be ensured that the *subject works* do not:
  - cause on-compliance within the existing building; or
  - aggravate an existing non-compliance within the existing building.
- Subject to consideration of the above comments, this report has not considered the requirement for the upgrade of existing building in terms of Accessibility compliance. Note that the Premises Standard (affected part) will still apply.
- Some requirements of the Access Regulations are recognised as being interpretive in nature. Where these matters are encountered, interpretations are made in accordance with Absolute policy &/or as guided by other standards, guides and industry best practice.
- Detailed assessment of any engineering matters or Australian Standards– e.g: structural, civil, electrical, hydraulic, mechanical, fire, bushfire protection is beyond the scope of this report.
- The Report does not provide for any Performance Solutions.
- Compliance with the recommendations of this report does not assure or guarantee compliance with the provisions of the DDA (as compliance cannot be measured through this assessment).

## 2.0 BCA Assessment Data

BCA Reference	Subject Building	
<b>A6</b> Classification	2 (residential)	<input type="checkbox"/>
	3 (residential – short term)	<input type="checkbox"/>
	4 (single dwelling in an otherwise non-residential building)	<input checked="" type="checkbox"/>
	5 (commercial – office)	<input type="checkbox"/>
	6 (retail)	<input type="checkbox"/>
	7a (carparking)	<input type="checkbox"/>
	7b (storage)	<input checked="" type="checkbox"/>
	8 (factory/industrial)	<input type="checkbox"/>
	9a (hospital/health care)	<input type="checkbox"/>
	9b (assembly/public building)	<input checked="" type="checkbox"/>
	9c (aged care)	<input type="checkbox"/>
<b>C2D3</b> Rise in Stories	2	

### 3.0 Accessibility Compliance Assessment & Minor Recommendations

The plans identified in Section 1.1 of this report have been assessed against accessibility requirements (See Section 1.2) – which are considered relevant to the current stage of design (Development Application or similar). A summary of these requirements is provided below.

**Where the plans show a *non-compliance* or are lacking in critical detail – recommendations have been provided in Section 4.0 to address the issue.**

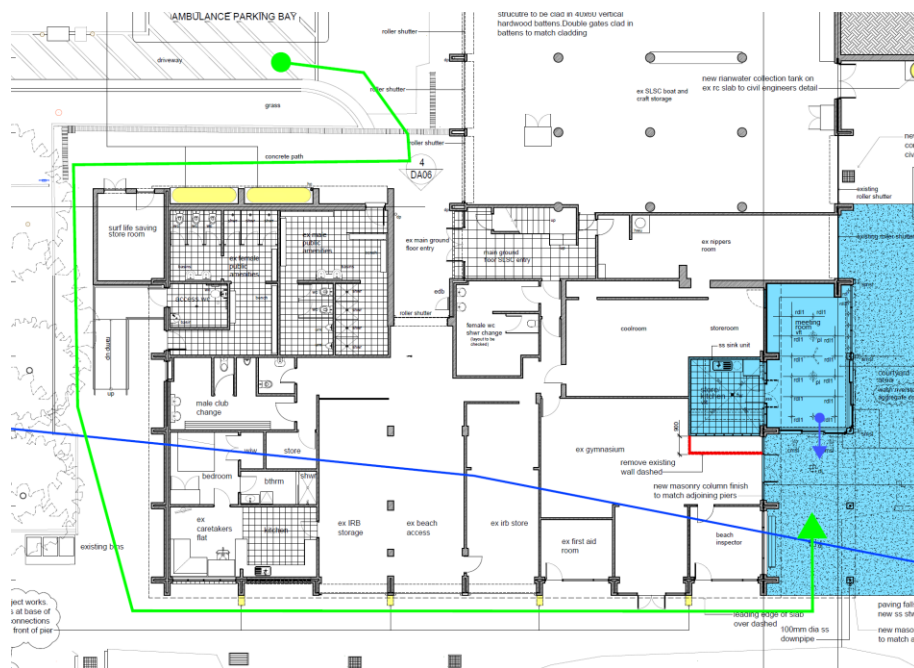
#### *BCA 2022 - Assessment Comments*

- a) Access is generally maintained to and within the new or 'affected' areas as required by BCA D4D2.
- b) Existing accessible entrances are not proposed to be affected by the proposed works.
- c) The new stairs (linking western side of first floor terrace to existing stairs) will need to comply with Clause 11 of AS1428.1-2009.
- d) Braille and Tactile Signage must be provided to:
  - a. Exit doors provided with an exit sign
  - b. At a non-accessible building entrance.
- e) New doorways will typically need to comply with AS1428.1 in terms of width, door hardware, circulation space and luminance contrast.
- f) Tactile Indicators complying with AS1428.4 are required to be provided to the top and base of the new stairs in accordance with BCA D4D9.
- g) Glazing On Accessways Glazing on an Accessway must comply with AS1428.1. This requires decals to be provided across full height glazing to reduce the likelihood of full height glazing from being mistaken for a doorway.
- h) Accessible Carparking not impacted on by the proposed works.

Under the Access to Premises Code – an accessway is required to link the existing building entrance (at western side of first floor) to the new 'board riders meeting room' at ground floor. This would typically require a lift or ramp (which is currently proposed).

It is considered that a performance solution to address this issue may be warranted at construction approval stage. The solution would support the lack of ramped/lift access to the meeting room, based on the characterises of the primary users & the availability of an accessible path via the eastern side of the building – as shown in green below).

Level access between the meeting room and the external paving is recommended.



## 4.0 Significant Recommendations

### 4.1 – Performance Solution – Lack of ramped or lift access to ground floor.

A performance solution is considered necessary to address the lack of ramped or lift access to ground floor board rooms meeting room. Absolute BCA & Accessibility is of the opinion that such a solution would not necessitate further design change.

## 5.0 Conclusion

This report has assessed the subject design against the relevant design requirements relating to access for people with a disability (including the requirements of the National Construction Code (NCC) / Building Code of Australia (BCA) 2022. (as relevant to the Development Application stage design).

Subject to compliance with any recommendations listed in Section 4.0 of this report, the development is considered capable of complying with the BCA, within the constraints of the current design.



Paul O'Shannassy

**Director**

**Absolute BCA & Accessibility Consulting Pty Ltd**

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**MAAC**