



Leda Holdings Pty Ltd

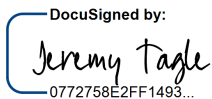
323-327 Warringah Road,
Frenchs Forest

**Access Review –
Final**

3 October 2023

REPORT REVISIONS		
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3.10.23	Final	DA drawings set – Issued For DA (dated 29.09.23) Prepared by WMK Architecture

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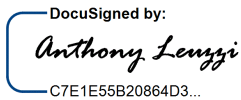
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1. Executive Summary

The Access Review Report is a key element in the design development of 323-327 Warringah Road, Frenchs Forest, 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.

2. Introduction

2.1 Background

Leda Holdings Pty Ltd has engaged Morris-Goding Accessibility Consulting to provide a design review of 323-327 Warringah Road, Frenchs Forest. The development consists of 36 warehouses with associated mezzanine office spaces, car parking and end of trip facilities.

The proposed development falls under a number of BCA classifications:

- Class 5 (commercial / office)
- Class 7a (carpark)
- Class 8 (warehouse)

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) 2022 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);

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)

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 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.

The surveys show that the site sits 5.8m lower than the Warringah Road allotment boundary. In addition, there is an existing driveway with no dedicated pedestrian route from the Rodborough Road allotment boundary. Due the nature of the site being Class 8 Warehouse (with associated Class 5 to serve the warehouses) and the existing site challenges, it is reasonable that provision for site access can be provided to the degree necessary in line with the performance requirements of the BCA.

Under BCA Clause D4D6, 2 accessible car parking spaces would be required for the proposed total of 102 car parking spaces. It is proposed that 3 accessible parking spaces will be provided at optimised locations in the development to service all tenancies on all floors in excess of the BCA requirement. Morris Goding Access Consulting can support this approach under a performance solution to be prepared during the construction certificate phase.

There are accessible paths of travel from all accessible car parking spaces to the entry door of all tenancies.

Access is provided to the first and second floor warehouses via the passenger lift.

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 e.g. 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.

Assessment

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

The entry doors to all warehouses and the ground floor amenities show capability of achieving compliance with AS1428.1. Minor adjustments are required to the EOT door to ensure door circulation compliant with AS1428.1 Fig. 31 however this is readily achievable.

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 2019 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 FS1 and FS2.

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 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.
- 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.

In general, all accessible paths of travel show suitable clear width and circulation to allow wheelchair users to make 180° turns or pass another wheelchair user travelling in the opposite direction.

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 E3D7 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.

The lift shaft is of a suitable size that will accommodate a passenger lift compliant with BCA Part E3 and AS1735.12.

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

The BCA and DDA Premises Standards contain requirements for stairs 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 and TGSIs in accordance with AS1428.4.1.
- Stairs are to be offset to ensure no encroachment of handrail extensions into from transverse path of travel at top and bottom of stair.

Assessment

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

All warehouse offices show stairs that have the capability to comply with AS1428.1 and AS1428.4.1 with slight modification to allow for an offset tread. Full compliance is readily achievable.

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.

5.4 Mezzanine Access

The BCA and DDA Premises Standards contain requirements for areas required to be accessible for the use of persons with disabilities. These requirements can be summarised as follows:

- Access is required to and within all areas normally used by the occupants.
- A ramp complying with AS1428.1 or a passenger lift need not be provided to serve a storey or level other than the entrance storey in a Class 5, 7b or 8 building-
 - i. Containing not more than 3 storeys; and
 - ii. With a floor area for each storey, excluding the entrance storey, of not more than 200m²

Assessment

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

Based on the square metreage of the development being >200m² and the access requirements of the BCA Class 5 offices on each of the mezzanine floors, it is assumed that

typically access is required into all of the mezzanine offices. To meet BCA Part D4D2 compliance, passenger lifts compliant with BCA Part E3 and AS1735.12 would need to be provided to each of the mezzanine offices.

It is proposed that a duplicate amenity office is provided on ground, first and second floors to allow any person with a mobility impairment to work on these floors without the need to use the stair to access the mezzanine offices. The accessible office will have all the same provisions as the mezzanine offices to allow for an equitable amenity outcome. Morris Goding Access Consulting can support this approach under a performance solution to be prepared during the construction certificate phase.

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, 7 and 8: Provide at least 1 unisex accessible toilet, adjacent to every bank of toilets (where provided) on each storey, compliant with AS1428.1 under BCA/DDA Access Code part F4D5. If more than 1 toilet bank provided on each level, accessible toilet is required at 50% min. of toilet banks at each level.
- 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 F4D5 compliant with AS1428.1:2009.

Assessment

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

All warehouse tenancies have an accessible toilet. The accessible toilet shows suitable internal dimensions to allow for appropriate circulation around the toilet pan, washbasin and shower recess compliant with AS1428.1.

The end of trip facility has male, female and accessible toilets. The accessible toilet shows suitable internal dimensions to allow for appropriate circulation around the toilet pan, washbasin and shower recess compliant with AS1428.1. Currently the drawings do not show ambulant cubicles in the male and female toilets however compliance is readily achievable.

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.

6.2 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:

- Class 5, 7 and 8: 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.

A total of 102 car parking spaces is proposed. Currently 3 accessible car parking spaces have been allocated in excess of the BCA requirement to support the performance solution noted in section 4.1 of this report.

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. Conclusion

MGAC has assessed the proposed scheme for 323-327 Warringah Road, Frenchs Forest. 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.