



ProjX PM

**67 Gaduying Close
Nambucca Heads NSW 2448**

DA Access Review

24 October 2022

REPORT TRACKING		
Date	Version	Drawing Documentation Issued
24.10.2022	V1	DA drawing set – Issued for Review revision A by Aaron Stevens Architects (PDF Bundle of 21 sheets): <i>20221017 - CCP-0177, Lot 67 Gaduying Court, Nambucca Heads, NSW</i>

Limitations and Copyright information:

The report only relates to the identified property and nominated stage of Development Application. The assessment pertains to the identified issued documentation and relies on the accuracy of that content. Access for people with a disability in the built environment is outlined in the report and is limited to interpretations of the Disability Discrimination Act 1992 and all other identified compliance benchmarks such as, but not limited to The National Construction Code (BCA), its nominated Australian Standards and other relevant codes and standards.

Building classification will be temporarily assumed in the case of a building surveyor not being appointed to the project and will be confirmed or amended when the building certifier is appointed.

It is assumed that all developers, project managers, architects, builders and consultants have access to all reference material governing compliance and expected practice, for reference.

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Project Overview

The project proposes to build 2 x houses on **Lot 67 Gaduying Close, Nambucca Heads NSW 2448** to accommodate people with a disability who require frequent carer visitors. The design intent is for the development to blend into the desired future character of the neighbourhood, avoiding, where possible, institutional 'look and feel'.

The buildings will have features conducive to accommodating participants of the National Disability Insurance Scheme (NDIS).



Artist impressions of the proposed development

Building Characteristics

2.1 Overview

ProjX PM has engaged Trimtab Access, to provide a design review of 2 x houses, located at **67 Gaduying Close Nambucca Heads NSW 2448**. The development consists of residential accommodation for people with a disability, possibly funded by the NDIS.

The proposed development falls under the BCA classification 3.

The requirements of the assessment are to:

- Review supplied drawings of the proposed development,
- Provide a report that analyses 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) and relevant Australian Standards.

2.2 Objectives

The report seeks to ensure compliance with statutory requirements and enhanced benchmark requirements set by the project – it considers user groups, who include residents, daily and overnight carers, family and friend visitors. The report attempts to deliver safety, equity, independence and functionality to people with a disability inclusive of people with:

- mobility impairment (crutches, walking frame, and wheelchair),
- sensory impairment (balance, hearing and vision),
- cognitive impairment (dementia, attention, communication), and
- dexterity impairment (arthritis, weakness, amputation).

Primarily, compliance with the Disability Discrimination Act 1992 is considered. In doing so, the report attempts to eliminate, as far as possible, discrimination against persons on the ground of disability and provide safety, equity and dignity.

2.3 Limitations

This report is limited to the accessibility provisions of the building in general, only. It does not provide comment on detailed design issues, such as internals of accessible toilets, fit-out, slip resistant floor finishes, door schedules, hardware and controls, glazing, luminance contrast, TGSIs, handrail design, signage, etc. that will be included in construction documentation and assessed prior to the issue of a Construction Certificate.

2.4 Accessibility of Design

The proposed design is assessed according to 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, providing reasonable access for people with disabilities.

The project architect and an appropriately qualified accessibility consultant will examine key physical elements, during design development stage, to identify any 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. 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 area, 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, to the extent possible, functional and/or practical.

2.5 Inclusive/ Universal Design

The BCA is the governing compliance measure as administered by principal certifying authorities (PCA) and/or building surveyors, however an occupation certificate (OC) does not ensure that the building owner is fully protected from complaint or litigation if the building or any other public built environment is determined as not providing safety, equity and dignity to a person with a disability or vulnerability, an age-related condition and/or their carers.

The Australian Human Rights Commission (AHRC) is the governing body that controls and enforces the intentions DDA compliance – as a complaints-based Act.

It is advised that all built environment projects lean towards better practice than minimum BCA compliance and consider the design inclusion of 7 x Universal Design Principles (UD).

The Universal Design Principles to consider in the on-going design include:

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

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 1992 (DDA),
- Disability (Access to Premises – Buildings) Standards 2010,
- Building Code of Australia (BCA) Part D3,
- AS1428.1:2009 - (General Requirement of Access),
- AS1428.4.1:2009 - (Tactile Ground Surface Indicators),
- AS2890.6:2009 - (Parking for People with Disabilities), and
- NDIS Specialist Disability Accommodation – Design Standard Edition 1.1.

The BCA is a performance-based code that is designed to encourage performance-based solutions where Deemed-to-Satisfy (DtS) is not achievable. At design stage, it is preferable to meet DtS, but where not possible to achieve, these solutions are best identified and declared as early as possible in the project development process. Any performance solutions will be commenced with a Performance-Based Design Brief (PBDB) requiring key stakeholder input and acceptance by the principal Certifying Authority (PCA).

The proposed development relies on BCA Performance Solutions, as identified in this report.

2.6 Supporting Documents

The documents provided for assessment pertaining to the Development Application are:

DRAWING TITLE	ISSUE	DRAWING TITLE	ISSUE
DA 0.0 COVER PAGE	A	DA 1.3 ROOF AND DRAINAGE PLAN	A
DA 0.1 EXISTING SITE PLAN	A	DA 2.0 ELEVATIONS	A
DA 0.2 SITE PLAN AND FENCE	A	DA 2.1 ELEVATIONS	A
DA 0.3 EARTHWORKS PLAN	A	DA 2.2 ELEVATIONS	A
DA 0.4 LANDSCAPE PLAN	A	DA 3.0 SECTIONS	A
DA 0.5 LANDSCAPE SPECS AND PLANTS	A	DA 3.1 SECTION	A
DA 0.6 BIN LOCATION PLACEMENT	A	DA 4.0 DOORS & WINDOWS SCHEDULE 1	A
DA 1.0 GROUND FLOOR PLAN 1:200	A	DA 4.1 DOORS & WINDOWS SCHEDULE 2	A
DA 1.1 GROUND FLOOR PLAN 1:100	A	DA 5.0 EXTERIOR COLOUR SCHEME TYPICAL	A
DA 1.2 FLOOR SPACE RATIO	A	DA 6.0 BUILDING ENVELOPE	A

Access for People with a disability (BCA Part D3)

3.1 General building access requirements

Buildings and parts of buildings must be accessible as required by Table D3.1 in the NCC 2019 Building Code of Australia – Volume One / Amendment 1.

BCA Class 3

Table D3.1 requires that the common areas on one floor containing sole-occupancy units be accessible. Where a lift or accessible ramp serves other levels, common areas on the levels served must also be accessible. Table D3.1 also requires access to be provided to at least one of each type of room or space used in common by the residents, such as TV lounges and dining rooms. A ratio of accessible sole-occupancy units is required. Where more than 2 accessible sole-occupancy units are required in a Class 3 building, they are to be representative of the range of rooms available, considering amenity and pricing.

Response:

Specialist Disability Accommodation (SDA) as required by the National Disability Insurance Scheme (NDIS) has 2 x design categories for participants (residents) who require a mobility aid (wheelchair). These categories are identified as High Physical Support (HPS) and Fully Accessible (FA).

There are also 2 x categories for participants who do not require a mobility aid. Robust (Ro) is for participants who have cognitive and behavioural disabilities and Improved Liveability (IL) is for participants who have a sensory impairment such as blindness or deafness.

These categories have specific design requirements as set out in the NDIS/ SDA Design Standard Edition 1.1 dated 25th October 2019 and require assessment and certification by a specialist SDA registered assessor.

In this proposed development, House 67 has 2 x sole occupancy units (SOU) and House 67A has 3 x SOUs that have all the features for people who have sensory and cognitive, but not mobility, disability. These are specifically for people who have vision, hearing and/or behavioural impairment. Participants who require wheelchair circulation will be accommodated in dwellings designed and dedicated to their needs.

The proposed dwellings are designed and meet compliance for Visibility (by people using a wheelchair) – as defined in AS4299 and Livable Housing Australia (LHA) silver, Gold and Platinum.

The omission of an accessible SOU and related circulation, in a class 3 dwelling, will be proposed at CC as a BCA performance solution.

3.2 Access to buildings

An accessway must be provided to a building required to be accessible from pedestrian boundary entries at the allotment boundary, to/from any other accessible building required to be accessible and any dedicated car parking on the site.

Pathways and entrances will demonstrate intended compliance with requirements for all accessible features such as walkways, ramps, stairways, circulation and the like.

Response:

This has been achieved with the inclusion of letterbox landings of 1540x2070mm, step ramps in accordance with AS1428.1 and navigable pathways with cross-fall not exceeding 1:40 gradient.

3.3 Parts of the building to be accessible

In a building required to be accessible, every ramp and stairway must comply with the requirements in AS1428.1, unless exempt under D3.4. Fire-isolated stairways only require an AS1428.1 handrail on one side of the stairway. All stairways must have off-set treads on mid-landings to avoid inconsistency of handrail heights.

All grabrails on ramps and stairs will have extensions and not intrude into any other path of travel. Lifts must comply with BCA E3.6 and AS1735.12.

Doorways on accessible paths of travel will have at least 850mm clear openings and circulation, including latch-side clearances.

Note:

The BCA and Premises Standards do not reference any specific egress for people with a disability. It is advised that the design considers inclusion of an evacuation plan and safety features for inclusive evacuation.

Response:

The design has facilitated the absence of lifts, internal stairways, 1:14 ramps, and tactile surface indicators (TGSIs). Step ramps are included – not requiring TGSIs or handrails (450mm high side walls are included as per AS1428.1). All doorways have a clear opening of at least 850mm.

Both houses will have sprinklers and evacuation plans.

3.4 Exemptions

In a building required to be accessible, parts of the building are exempt from providing access for a person with a disability. These areas could include plant rooms, loading docks, commercial kitchens, rigging lofts, waste containment areas, foundry floors, fire lookouts, Assessment of these areas is on a case-by-case basis.

Response:

The proposed garden sheds are exempt under D3.4. Communal areas being washing lines and waste bins are not accessible. This is due to the caring management of the residents. A

BCA performance solution will cover this non-deemed to satisfy (DtS) at construction certification.

3.5 Accessible Parking

Dedicated accessible parking spaces (DAPS) in a building required to be accessible, must be provided in accordance with AS2890.6.

The quantity of DAPS is calculated as a percentage of total spaces as determined by the BCA consultant – as per the building class.

Response:

Generally, the ‘independent living’ operators of disability housing do not provide dedicated parking for residents and not required by the SDA Design Guidelines. It is also a clear intention for SDA projects to not appear ‘institutional’ in a residential setting (yellow chevron markings and bollards). The parking will be standard as per AS2890.1 and the exclusion of AS2890.6 parking will be covered by a BCA performance solution at construction certification.

3.6 Signage

D3.6 provides requirements for signage in buildings required to be accessible by Part D3. Signage is only required by Part D3 in particular situations. D3.6(a)(i) provides that all sanitary facilities, except those within a bedroom of a Class 1b building or a sole-occupancy unit in a Class 3 building,

Response:

As per the BCA, this project, a private home, is not required to have signage for people with a disability.

3.7 Hearing augmentation

Hearing augmentation is required where there is an in-built amplification system. This can be provided by an in-built system or a portable user-based system.

Response:

The requirement of hearing augmentation is specific to individual needs. Built-in systems for use in this domestic setting have potential for interference with each other. If this feature is required, the housing provider/manager will provide a portable system conducive to the user’s needs.

3.8 Tactile indicators

Warning Tactile Ground Surface Indicators (TGSIs) are intended only to be used for specific hazard identification at the top and bottom of stairways, escalators and ramps except those only leading to areas exempted under D3.4, and where there is an overhead obstruction less than 2 m above the floor along the pathway, in the absence of a suitable barrier that would prevent a person from hitting the overhead obstruction.

Response:

A principal certifying authority (PCA) might consider the possibility for a resident or carer to cross the driveway and consider the requirement for TGSIs. In this instance, a BCA performance solution will seek to exclude TGSIs on the basis that the property is not a public place and that residents with vision impairment will become familiar with the space and function of their home.

House 67A has an external stairway attached – this will be provided with TGSIs unless the housing provider chooses to use the button on the handrail option as might be appropriate.

3.9 Wheelchair seating spaces

This BCA requirement does not apply to this proposal.

3.10 Swimming pools

The development proposal does not include a swimming pool.

3.11 Ramps

Refer Part 3.3.

3.12 Glazing on an accessway

This provision requires there to be a contrasting strip, chair rail, handrail or transom across all frameless or fully glazed doorways and surrounding glazing capable of being mistaken for an opening. The purpose of this requirement is to assist a person who has a vision impairment to be able to identify the presence of the glazing and avoid injury caused by contact with the glazing. A contrasting strip with a series of dots, unconnected patterns or shapes that do not provide high levels of contrast would not meet the requirements of this provision.

Response:

The drawings show the inclusion of compliant glazing strips.



Indicative Floor Plan

House 67

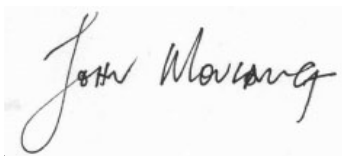
House 67A

Conclusion

Trimtab Access has assessed the proposed scheme for 67 Gaduying Close Nambucca Heads NSW 2448.

The provided drawings indicate that accessibility requirements, pertaining to BCA Parts D3, can be readily achieved. Also, the provided documentation indicates that compliance with the DDA Premises Standards can be achieved and show full compliance prior to the issue of a construction certificate. The construction certification will rely on performance-based solutions by Trimtab Access or an alternative consultant qualified and accredited to meet the BCA requirement for Expert Judgement.

It is advised that Trimtab Access work with the project team as the scheme progresses to ensure appropriate outcomes are achieved in building and external domain design.



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