



24 July 2023

Our Ref: P222_504

EJE Architecture
Sent Via Email

Attention: Luke Jogever

395 Metford Road, Metford NSW 2323
Accessibility Capability Statement for DA Submission

1. INTRODUCTION

An assessment of the subject development has been undertaken by Design Confidence at the request of EJE Architecture and relates to the proposed Medical centre with multiple tenancies spread over 2 buildings known as Buildings A and B located at 395 Metford Road, Metford.

2. BACKGROUND

Design Confidence has been engaged to provide building regulatory advice regarding the compliance status of the proposed development when assessed against the relevant prescriptive requirements as contained within the Building Code of Australia (BCA) 2022– Volume 1, including the Part D4 Access for People with a Disability, Parts E3D7 and E3D8 Passenger Lifts, Parts F4D5, F4D6, F4D7 Accessible Sanitary Facilities as applicable to this development.

This correspondence has been provided to assist with development of the design documentation, a broad assessment has been undertaken of the proposed design as detailed within the documentation listed in **Appendix 1**.

The advice being provided to date has been in the context of the following—

- » Building Code of Australia (BCA) 2022 – Volume 1;
- » AS1428.1-2009 Design for access and mobility Part 1: General requirements for access – New building work;
- » AS1428.4.1-2009 Means to assist the orientation of people with a vision impairment – Tactile Ground Surface Indicators;
- » AS2890.6-2009 Off-street parking for people with disabilities; and
- » AS1735.12-1999 Lifts, escalators and moving walks: Part 12 Facilities for persons with disabilities.

3. ASSESSMENT

The proposed development includes the construction of two new two storey buildings with Building A positioned closest to Metford Road vehicle entrance and Building B located on the other end of the site adjoining the Turton Street vehicle exit. Both buildings have been shown to allow multiple individual tenancies for the purposes of medical practices and services.

In the context of this report and the BCA the building use can be described as follows—

Table 1 – Building Classification

STOREY	CLASSIFICATION	DESCRIPTION
Buildings A & B – Two Storeys	Class 6	Medical Centre

In addition to undertaking a detailed assessment of the design against the prescriptive requirements of the BCA a preliminary performance-based assessment has also been undertaken.

The implementation of a performance-based approach in lieu of compliance with the deemed-to-satisfy (DtS) provisions of the BCA shall be disclosed to the relevant stakeholders and is subject to the approval of the certifying authority.

The **Table 2** below lists scenarios where we believe the adoption of a performance design may add value to development in-lieu of complying with the prescriptive (DtS) provisions—

Table 2 – Performance Solutions

ITEM	PROPOSED PERFORMANCE SOLUTION	BCA DtS CLAUSE	PERFORMANCE REQUIREMENT
1	Nil	-	-

Table 3 below outlines the relevant accessibility measures that will be provided as part of the development such that compliance with the BCA is achieved, specifically with Part D4 Access for People with a Disability, Parts E3D7 and E3D8 Passenger Lifts, Parts F4D5, F4D6, F4D7 Accessible Sanitary Facilities as applicable to this development.

Table 3 – Accessibility Measures

DESCRIPTION / PROPOSED STANDARD OF PERFORMANCE	STATUTORY REQUIREMENT	COMMENT
General building access requirements Clause D4D2	Buildings and parts of buildings must be accessible as required by this clause, unless exempted by D4D5. Class 6 Access is required to be provided to and within all areas normally used by the occupants.	Access is provided to all areas within the Class 6 buildings to achieve BCA compliance.
Access to buildings Clause D4D3	An accessway must be provided to a building required to be accessible— a) from the main points of a pedestrian entry at the allotment boundary; and	A lift is provided in Building A that allows access from the lower end of the site, up to Ground level and approach Building B via connecting walkways. Access from all accessible carspaces are then available and access from both allotment boundaries to each Building entrance. Directional signage required throughout the site to ensure

	<ul style="list-style-type: none"> b) from another accessible building connected by a pedestrian link; and c) from any required accessible carparking space on the allotment. 	wayfinding throughout the site is clear and accessible.
<p>Pedestrian Entrances Clause D4D3</p>	In a building required to be accessible, an accessway must be provided through the principal pedestrian entrances.	The building is capable of achieving compliance with this clause.
<p>Parts of building to be accessible Stairways and Ramps Clause D4D4</p>	<p>In a building required to be accessible, every ramp and stairway, except for ramps and stairways in areas exempted by D4D5, must comply with—</p> <ul style="list-style-type: none"> a) for a ramp, except a fire-isolated ramp, clause 10 of AS 1428.1; and b) for a stairway, except a fire-isolated stairway, clause 11 of AS 1428.1; and c) for a fire-isolated stairway, clause 11.1(f) and (g) of AS 1428.1. <p>Every passenger lift must comply with E3D7.</p> <p>Accessways are to comply with this clause and AS1428.1.</p>	<p>The building is capable of achieving compliance with this clause.</p> <p>Detailed drawings at further stages to show handrails and nosing strips to stairways achieve compliance with AS1428.1 and AS1428.4.1.</p> <p>Stairs not defined as Fire Isolated stairs however are for egress only and constructed as a fire isolated stair may be supported by a Performance Solution to provide a single handrail and no TGSIs if required at construction Documentation stage.</p>
<p>Exemptions Clause D4D5</p>	<p>The following areas are not required to be accessible:</p> <ul style="list-style-type: none"> a) An area where access would be inappropriate because of the particular purpose for which the area is used. b) An area that would pose a health or safety risk for people with a disability. c) Any path of travel providing access only to an area exempted by (a) or (b). 	<p>The following rooms / areas and associated accessways have been afforded the concession under D4D5 based on the health or safety risk and therefore access for people with disabilities need not be provided to these areas –</p> <ul style="list-style-type: none"> i) External waste areas <p>Written confirmation at CC stage required from client confirming areas to be considered under D4D5 exemptions.</p>
<p>Signage Clause D4D7 and Specification 15</p>	Signage in accordance with this clause and details within AS1428.1 to be provided to identify sanitary facilities, non-accessible pedestrian entrances, directional signage and exit levels, where applicable.	<p>The building is capable of achieving compliance with this clause.</p> <p>Signage package to be submitted with detailed design documentation in accordance with this clause.</p>
<p>Hearing Augmentation Clause D4D8</p>	<p>As design progresses, consideration shall be given to the hearing augmentation provisions.</p> <p>A hearing augmentation system will be required where an inbuilt amplification system, other than one for emergency</p>	Hearing augmentation requirements will fall under the individual tenancy fitout construction approvals, where applicable.

	<p>warning, is installed. Consideration to be given particularly to the –</p> <ul style="list-style-type: none"> a) Meeting rooms, training rooms, boardrooms and the like; b) Any screened reception area. 	
<p>Tactile indicators Clause D4D9 Stairways and ramps</p>	<p>For a building required to be accessible, tactile ground surface indicators must be provided to warn people who are blind or have a vision impairment that they are approaching—</p> <ul style="list-style-type: none"> a) a stairway, other than a fire-isolated stairway; and b) a ramp other than a fire-isolated ramp, step ramp, kerb ramp or swimming pool ramp. c) Tactile ground surface indicators must comply with sections 1 and 2 of AS/NZS 1428.4.1. 	<p>The building is capable of achieving compliance with this clause.</p> <p>Further details of tactile indicators to be submitted with detailed design documentation in accordance with this clause.</p>
<p>Glazing on accessways Clause D4D13</p>	<p>On an accessway, where there is no chair rail, handrail or transom, all frameless or fully glazed doors, sidelights and any glazing capable of being mistaken for a doorway or opening, must be clearly marked in accordance with AS 1428.1.</p>	<p>The building is capable of achieving compliance with this clause.</p> <p>Further details of the glazing decals to be submitted with detailed design documentation in accordance with this clause.</p>
<p>Accessible sanitary facilities Clause F4D5 & F4D6</p>	<p>In a building required to be accessible—</p> <ul style="list-style-type: none"> a) accessible unisex sanitary compartments must be provided in accessible parts of the building in accordance with F4D6; and b) accessible unisex showers must be provided in accordance with F4D7; and c) an accessible unisex sanitary compartment must contain a closet pan, washbasin, shelf or bench top and adequate means of disposal of sanitary products; and d) the circulation spaces, fixtures and fittings of all accessible sanitary facilities provided in accordance with F4D6 and F4D7 must comply with the requirements of AS 1428.1; and e) an accessible unisex sanitary facility must be located so that it can be entered without crossing an area reserved for one sex only; and 	<p>The building is capable of achieving compliance with this clause.</p> <p>Further details of accessible sanitary facilities to be submitted with detailed design documentation in accordance with this clause and AS1428.1.</p>

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- f) where two or more of each type of accessible unisex sanitary facility are provided, the number of left and right handed mirror image facilities must be provided as evenly as possible; and
 - g) where male sanitary facilities are provided at a separate location to female sanitary facilities, accessible unisex sanitary facilities are only required at one of those locations; and
 - h) an accessible unisex sanitary compartment or an accessible unisex shower need not be provided on a storey or level that is not required by D4D4(f) to be provided with a passenger lift or ramp complying with AS 1428.1.

Where required by F4D5(a), the minimum number of accessible unisex sanitary compartments for each class of building is as follows:

- a) For Class 5, 6, 7, 8 or 9 buildings, where F4D4 requires closet pans—
 - (i) 1 on every storey containing sanitary compartments; and
 - (ii) where a storey has more than 1 bank of sanitary compartments containing male and female sanitary compartments, at not less than 50% of those banks.

Ambulant sanitary facilities

Clause F4D5

At each bank of toilets where there is one or more toilets in addition to an accessible unisex sanitary compartment at that bank of toilets, not less than one sanitary compartment suitable for a person with an ambulant disability for use by males and one sanitary compartment suitable for a person with an ambulant disability for use by females, must be provided.

Not applicable. Each tenancy has the minimum one unisex facility within each tenancy and complies with Clause F4D5 of the BCA.

4. SUMMARY

Based upon the information contained in the above tables one can determine that the proposed is capable of achieving compliance with the relevant accessibility requirements of the BCA, subject to the comments provided above.

Compliance can be achieved either by meeting the deemed-to-satisfy requirements of the BCA, as are principally contained within Part D4 *Access for People with a Disability*, E3D7 and E3D8 *Passenger Lifts* and Parts F4D5, F4D6, F4D7 *Accessible Sanitary Facilities*, or via a performance-based approach.

We trust that the above information is sufficient for the consent authority in assessing the merit of the architectural design from a planning perspective.

This statement should not be construed as relieving any other parties of their legislative obligations.

Design Confidence possess Indemnity Insurance to the satisfaction of the building owner.

Kind Regards,

Report By

Reviewed By



Rachael Telling
Consultant | Accessibility
For Design Confidence (Sydney) Pty Ltd

John La Scala
Associate | Accessibility
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APPENDIX 1 – DOCUMENTATION PROVIDED FOR ASSESSMENT

This accessibility assessment was based upon the architectural documentation prepared by EJE Architecture namely—

DRAWING	REV	TITLE	DATE
A00		COVER SHEET	24/07/2023
A01	E	EXISTING SITE PLAN	24/07/2023
A02	F	PROPOSED SITE PLAN & ANALYSIS	24/07/2023
A04	F	OVERALL ELEVATIONS	24/07/2023
A05	F	BUILDING A - GROUND LEVEL	24/07/2023
A06	D	BUILDING A - LEVEL 1	24/07/2023
A07	F	BUILDING A - ROOF PLAN	24/07/2023
A08	F	BUILDING A - NORTH, SOUTH, EAST & WEST ELEVATION	24/07/2023
A09	E	BUILDING A - SECTION A-A, B-B, C-C, D-D	24/07/2023
A10	E	BUILDING B - LOWER GROUND LEVEL	24/07/2023
A11	C	BUILDING B - GROUND LEVEL	24/07/2023
A12	E	BUILDING B - ROOF PLAN	24/07/2023
A13	E	BUILDING B - NORTH, SOUTH, EAST & WEST ELEVATION	24/07/2023
A14	E	BUILDING B - SECTION A-A, B-B, C-C, D-D	24/07/2023