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places

Disability Access Report

Prepared for

Australian Property Development Services Pty Ltd

Location

St Paul's Anglican Church
Corner of Moseley Street & Vickery Avenue,
Carlingford, NSW

Date

07 December 2021

Project No.

P000669



Document Control

Filename	Revision	Date
211103_Inc Pla_St Paul's Anglican Church - Carlingford _0669_DA_v1	1	03 November 2021
211207_Inc Pla_St Paul's Anglican Church - Carlingford _0669_DA_v2	2	07 December 2021

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1. Introduction

1.1 Report Background

Inclusive Places (Cheung Access Pty Ltd) has been commissioned by Australian Property Development Services Pty Ltd to provide an accessibility review of the plans for an extension to the existing building St Paul's Anglican Ministry Centre, located on the corner of Moseley Street & Vickery Avenue, Carlingford, NSW (Class 9b - Church Ministry Centre and Administration). The proposed works utilises the lift from the existing St Paul's Anglican Church.

This development application consists of the following:

- 13 offices
- Open plan desk area
- Meeting room
- Board room
- Kitchen area
- 10 "classrooms"
- Breakout space
- Kitchenette
- Storage
- New stairs
- Sanitary facilities

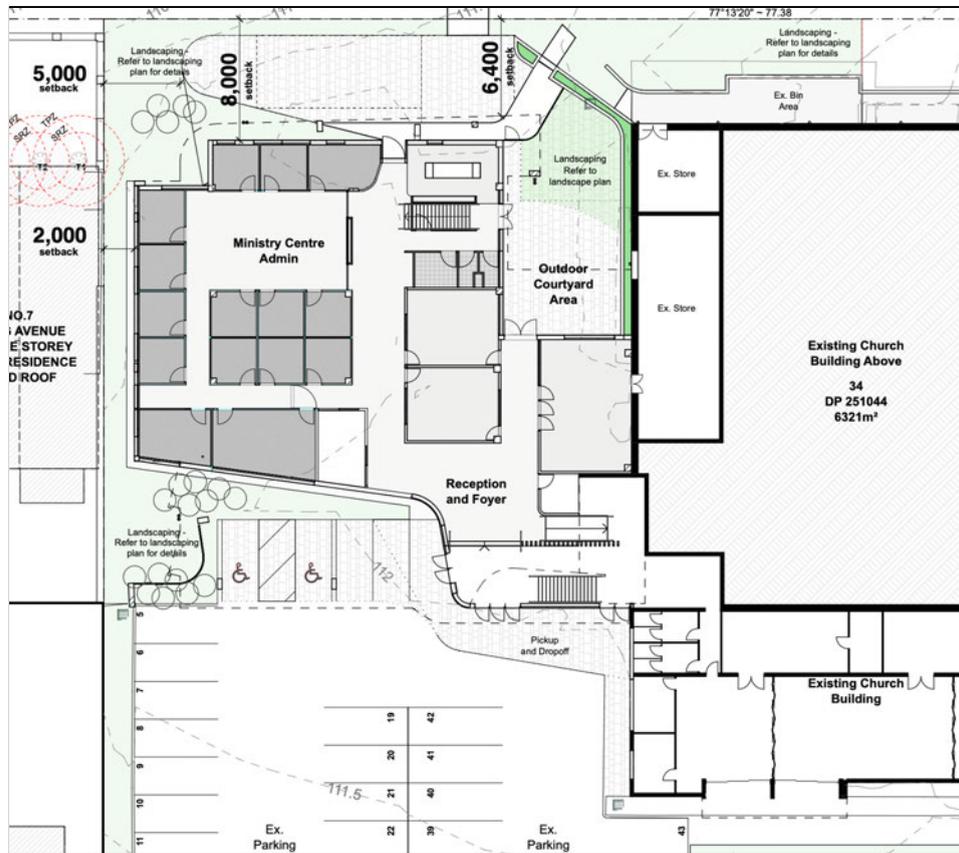


Figure - level 1 plan by Stanton Dahl Architects

Our engagement involved a desktop assessment of the architectural plans against the provisions of the Part D3, E3.6 and F2.4 of the National Construction Code Series (Volume 1) Building Code of Australia 2019 (BCA) - Amendment 1.

1.2 Report Purpose

The key objectives of the report are as follows:

- ❑ Undertake an assessment of the proposed development against:
 - ❑ Part D3, E3.6 and F2.4 Deemed to satisfy provisions of the National Construction Code Series – Volume 1- Building Code of Australia (2019) Amendment 1.
 - ❑ The Disability (Access to Premises—Buildings) Standards 2010 (the Premises Standards)

- ❑ Identify any compliance departures that require resolution/attention for the proposed development by way of design change or Performance Solutions for the next stage of design prior to submission of a Construction Certificate.
- ❑ Verify that the referenced documentation has been reviewed by an appropriately qualified Accredited Access Consultant and demonstrate that compliance with the BCA / Access to Premises – Building Standard 2010 is readily achievable.
- ❑ Enable the certifying authority to satisfy its statutory obligations under Clause 145 of the Environmental Planning and Assessment Regulation, 2000 and its statutory obligations under the Building and Development Certifiers Regulation 2020.
- ❑ Accompany the submission of documents to the building contractor to enable them to be satisfied that the building design is capable of complying with the NCC/BCA and that subsequent compliance with the access requirements of the BCA, will not give rise to design changes, which may necessitate the submission of additional S4.55 applications under the Environmental Planning and Assessment Act, 1979.

Inclusive Places has reviewed the revised Development Application drawings for St Paul's Ministry Centre, located on the corner of Moseley Street & Vickery Avenue, Carlingford,, to assess for consistency with the following disability design criteria contained within:

- A. The intent and objects of the Disability (Access to Premises- Buildings) Standards (2010) - Affected Part.
- B. Part D3, E3.6 and F2.4 of the Building Code of Australia (BCA) (2019) - Amendment 1.
- C. Relevant Australian Standards listed in the BCA (2019), as follows:
 - ❑ AS1428.1 Design for Access and Mobility: General requirements for Access – New Building Work (2009)
 - ❑ AS1428.4.1 Design for Access and Mobility: Means to assist the orientation of people with vision impairment – Tactile ground surface indicators (2009)
 - ❑ AS1735.12 Lifts, escalators and moving walks – Facilities for persons with disabilities, Amendment 1 (1999).
 - ❑ AS2890.6 Parking facilities - Off-street parking for people with disabilities (2009)
 - ❑ AS4586 (2013) Slip resistance classification of new pedestrian surface materials
- D. Parramatta Development Control Plan 2011 - Part 5.3 Places of public worship and educational establishments.

In the preparation of this report, documentation relied upon is referenced in Appendix A.

1.3 Report Limitations and Exclusions

The limitations and exclusions of this report are as follows:

- This report is based on a review of the referenced documentation in the Appendix A.
- This Report does not address issues in relation to the design, maintenance or operation electrical, mechanical, hydraulic or fire protection services, Utility Services Provider Requirements (Water, Gas, Telecommunications and Electricity supply authorities), Local Government Act and Regulations, Occupational Health and Safety Act and Regulations or the like.
- This assessment does not incorporate the detailed requirements of the BCA Referenced Australian Standards and it's the responsibility of design and installation contractors to demonstrate and achieve compliance for all new works.
- The commentary within this Access Assessment Report does not relieve the Principal Designer, Principal Building Contractor or the Certifying Authority from their statutory obligations under the EP&A Act, Work Health Safety Act, Building and Development Certifiers Regulation 2020 and the like and they are to be satisfied that the proposal meets their requirements prior to approval.
- It is important to note that without the written permission from Inclusive Places (Cheung Access Pty Ltd), no part of this report may be reproduced in any form or by any means. This report is based solely on client instructions and therefore should not be relied upon or used by any third party without prior knowledge and instructions from Inclusive Places
- All reasonable attempts have been made to identify key compliance matters pursuant to the BCA and additional issues which have been deemed an impediment to access provision and may increase Client risk of attracting a complaint under the DDA.
- Inclusive Places accepts no responsibility for any loss suffered as a result of any reliance upon such assessment or report other than providing guidance to alleviate access barriers in the built environment and reduce Client risk of attracting a complaint under the DDA.

Exclusions to the access Report:



- Inclusive Places has not physically reviewed external pathways (around and outside the site) of the proposed new works. This is the responsibility of the Client to address at a later stage.

1.4 Disability Discrimination Act 1992 (DDA)

The Federal Disability Discrimination Act 1992 (DDA) provides protection for everyone in Australia against discrimination based on disability. Section 32 of the DDA focuses on the provision of equitable and dignified access to services and facilities for people with mobility, sensory and cognitive disabilities.

Disability discrimination happens when people with a disability and their relatives, friends, carers, co-workers or associates are treated less fairly than people without a disability. Compliance with Access to Premises Standards give certainty to building certifiers, building developers and building managers that, if access to (new parts) of buildings is provided in accordance with these Standards, the provision of that access, to the extent covered by these Standards, will not be unlawful under the DDA. This however applies only to the new building or new parts of an existing building and its affected part. All areas outside the scope of these areas are still subject to the DDA. We cannot guarantee or certify for DDA compliance because DDA compliance can only be assessed by the Courts. Scope of DDA extends beyond the building fabric and also includes furniture and fittings.

From 1 May 2011, the Commonwealth's Disability (Access to Premises - Buildings) Standards made under the Disability Discrimination Act 1992 (DDA) applies to all new building work. The Premises Standards, established requirements for access to buildings, that are incorporated into the BCA 2019.

The Premises Standards contain an Access Code of construction that is mirrored in the disability access provisions of the BCA 2019 - Amendment 1. New building work must comply with the Access Code in the same manner as complying with the BCA 2019 Amendment 1 by meeting deemed-to-satisfy provisions or by adopting a performance solution that achieves the relevant performance requirements.



This means if access is provided in accordance with the Premises Standards then it is not unlawful under the DDA. It also ensures that Object 1.3 (a) of the Premises Standards is met which is to:

‘Ensure that dignified, equitable, cost-effective and reasonably achievable access to buildings and facilities and services within buildings is provided for people with a disability.’

1.5 Proposed Development

BCA Classification:

Class	Level	Description
7a	External Ground	Revision of existing car parking to include 2 accessible car spaces.
9b	Levels 1 and 2	Administration on Level 1 “Class” Rooms on Level 1 and 2

Areas Required to be Accessible:

Area	Level	Description
Accessible Entry	Ground	Accessway provided from the main point of pedestrian entry at the allotment boundary. To and within all areas normally used by the occupants.
Church Ministry Centre	Level 1 and Level 2	To and within all areas normally used by the occupants. To wheelchair seating spaces provided in accordance with D3.9. To and within all other areas normally used by the occupants, except that access need not be provided to tiers or platforms of

		seating areas that do not contain wheelchair seating spaces.
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1.6 Report Structure

The report consists of a Summary of ‘Further Review at Construction Certificate Stage’ in the table under Section 2 below, which is for the reader’s ease of reference and most urgent attention. Notwithstanding the summary of issues within Section 2 must also be read in conjunction with the body of the assessment provided under Section 3 of the report which further details compliance matters needing consideration in design development and during construction.

Section 3 Disability Access Assessment

Section of Report	Design Criteria
3.1	BCA Part D3 – Access For People with Disabilities

It is also the responsibility of all design consultants to ensure compliance with relevant BCA access requirements, DCP controls, Australian Standards and Manufacturers Specifications. This report does not in any way relieve design consultants from their obligations in designing to achieve compliance with the BCA. Furthermore, this report does not relieve the PCA from their statutory obligations required to assess the drawings in detail prior to the issue of a Development Application.

1.7 Compliance with BCA Part D3

The proposed development will satisfy the prescriptive deemed-to-satisfy provisions of Part D3, E3.6 and F2.4 of the BCA (2019)- Amendment 1, as follows:

1. An accessible pathway from Vickery Avenue (street level) through the existing building to the new areas.
2. Access to and within all areas normally used by occupants where there is provision of a lift.
3. Continuous accessible path of travel is provided to all levels where there is the provision of a lift connecting Level 1 to Level 2.

4. Provision of accessible parking in accordance with the requirements of BCA Part D3.5.

2. Further Review at Construction Certificate Stage

It is noted that this assessment is based on DA architectural drawings and are not yet sufficiently detailed for a Construction Certificate approval.

The following comprises a summary of the key compliance issues identified under the Disability Access Assessment in Section 3 and is to be read in conjunction with the aforementioned Sections and the Building Code of Australia Volume 1.

The following matters are to be considered & addressed to the satisfaction of the Certifying Authority in the next design and construction phase.

#	Relevant BCA Clause	Element	Issue	Compliance requirement
1	D3.1	Internal paths of travel	Ongoing design detail	All internal accessible paths of travel, including to and within all areas used by the occupants to comply with AS1428.1 (2009) for: <ul style="list-style-type: none"> • minimum widths, • gradient, • crossfall • turning spaces • slip resistance surfaces (with ratings as per Table 3B, HB198:2014 - Wet pendulum test or Oil-wet inclining platform classifications for applications where NCC does not require slip resistance)
2	D3.2	Doors	Ongoing design	Accessway to be provided from



			detail	<p>pedestrian entry point on the allotment boundary</p> <p>Accessway to be provided from on-site accessible parking bays</p> <p>Accessway to be provided from other accessible buildings on site</p> <p>All entry doors to have compliance with AS1428.1 (2009) with respect to:</p> <ul style="list-style-type: none"> ● 850mm clear openings ● Door latch and hinge side circulation space ● 30% luminance contrast on doorways ● Door operation and hardware ● Door force is 20N including where a door closer is fitted.
3	D3.3	Stairs and ramps	Ongoing design detail	<p>All non-fire-isolated stairs to comply with AS1428.1 Cl 11 Stairs (2009) with regards to</p> <ul style="list-style-type: none"> ● Minimum width of 1000mm ● Handrails on both sides ● Handrail heights to be 865mm to 1000mm above step nosing ● Handrail extensions at top and base ● Kerb rails or suitable barriers for sides of ramps ● Tactile indicators on top and bottom landing of steps and ramps ● Contrast strips to edge of stair nosings 50 - 75mm deep (30% contrast with the stair surface)



4	D3.6	Accessible signage	Ongoing design detail	<p>Accessible signage to be provided in accordance with BCA2019 and AS1428.1-2009 for:</p> <ul style="list-style-type: none"> • Required exit doors stating 'Exit' and 'Level' followed by floor number. • All sanitary facilities
5	D3.7	Hearing Augmentation	Not specified	<ul style="list-style-type: none"> • Determine whether hearing augmentation is required such as where there is a built in Audio-Visual system including any TV within any of the meeting and/or class rooms. • Confirm if there will be an inbuilt amplification system.
6	D3.12	Glazing	Visual Banding	Ongoing design detail to be checked at CC and OC stages.
7	E3.6	Lift	Ongoing design detail	<p>Ensure existing lift still complies with Table E3.6 (it was installed new in 2018 and complied with the BCA at the time)</p> <ul style="list-style-type: none"> • Lift between level 1 and level 2
8	F2.4	Sanitary facilities	Ongoing design detail	<p>All accessible and ambulant sanitary facilities to have pathways and fittings in accordance with AS1428.1-2009 including:</p> <ol style="list-style-type: none"> 1. Fixtures and fittings <ol style="list-style-type: none"> a. Accessible bathrooms - detailed drawings and schedule of fittings b. 2. Wheelchair circulation to and within accessible Bathroom



				<ul style="list-style-type: none"> 3. Door schedule showing <ul style="list-style-type: none"> a. 850mm clear openings, b. circulation space c. 30% luminance contrast 4. Slip resistant floor surface in bathrooms as per AS/NZS4586
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3. Disability Access Assessment

3.1 Affected Part Upgrade

The mandatory requirement for this Tender submission for a Class 9b building triggers the application of an 'affected part upgrade' under Part 2 Scope of Standards, 2.1 (5), Buildings to which Standards apply, Disability (Access to Premises- Buildings) Standards (2010).

An affected part is defined as:

- (a) *the principal entrance of an existing building that contains a new part; and*
- (b) *any part of an existing building, that contains a new part, that is necessary to provide a continuous accessible path of travel from the entrance to the new part.*

From the Corner of Moseley Street & Vickery Avenue, Carlingford, NSW , access will be provided from the existing principal entrance of St Paul's Anglican Church to the new part, as follows:

Ministry Centre	Affected Part Compliance
Ground level Principal Entrance to the Ministry Centre	The existing principal entrance of the church from Vickery Ave provides a door leaf with a clear opening of 850mm.
New Part	All areas within the Level 1 and 2 of the Ministry Centre
Continuous Accessible Path of Travel from entrance to the new part	An accessible pathway is provided from the principal entrance within the existing St Paul's to the new parts on Level 1 and 2 of the Ministry Centre. An existing lift which was built in 2018, will be the accessible path of travel between Level 1 and 2. This will meet Clause 6



	Continuous Accessible Paths of Travel (AS1428.1 – 2009) with respect to gradients, floor surfaces and door openings, turning spaces for a wheelchair and luminance contrast around doorways.
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3.2 BCA Part D3 – Access For People with Disabilities

The following is a clause-by-clause assessment of the architectural drawings against BCA Part D3 – Access For People with a Disability. For more detail on each requirement, please refer to *Appendix B: BCA Part D3 – Access For People with a Disability*.

Deemed to Satisfy Provision	Complies	Comments
D3.1 General building access requirements Class 3 Accommodation	✓	<p>The drawings demonstrate access will be provided to the maximum extent possible to all areas on all levels of the development.</p> <p>Accessible entry into the building from the street level is proposed through the existing front entry from Vickery Avenue with access to both levels via the existing lift.</p> <p>Circulation spaces and passing spaces have been provided at the end of corridors and at doorways to comply with AS1428.1 (2009).</p> <p><u>Recommended Action</u></p> <p>Ensure during ongoing design development:</p> <ol style="list-style-type: none"> 1. Areas required to be accessible are accessible in accordance with the BCA and/or AS1428.1(2009) 2. External and internal pathways comply with AS1428.1 (2009). 3. Doors for all parts of the building required to be accessible have compliance with AS1428.1 (2009) with respect to clear opening widths, door circulation on both sides, luminance contrast on doors, door hardware, and door force is 20N



		<p>where a door closer is fitted.</p> <p>4. Slip resistance certification for common area paving, ramp surfaces and stairs, is provided showing testing under wet surface conditions in accordance with AS4586 – 2013 to confirm compliance with AS1428.1(2009) Clause 7.</p>
D3.2 Access to buildings	✓	<p>There is an accessible pathway indicated on the drawings into the site from the Vickery Avenue street frontage.</p> <p>An existing lift links to level 1 and level 2.</p> <p>Accessible parking is provided on-site. Access into the building is provided via a new entry foyer on Level 1.</p> <p><u>Recommended Action</u></p> <p>During ongoing design and construction, ensure:</p> <ol style="list-style-type: none"> 1. External and internal pathways comply with AS1428.1 (2009). 2. Entry doors have compliance with AS1428.1 (2009) with respect to clear opening widths, luminance contrast on doors, door hardware, and door force is 20N including where a door closer is fitted. 3. Existing lift complies with AS1735.12 or meets the lift concession in the Premises Standards.
D3.3 Parts of building to be accessible	✓	<p>Accessible walkways and ramps</p> <p>Plans show AS1428.1-2009 complying walkway widths are included on the path of travel from the allotment boundary</p> <p><u>Recommended Action</u></p> <p>Accessible pathways (including communal areas) to comply with AS1428.1-2009:</p> <ul style="list-style-type: none"> ● Clause 6 - dimensions ● Clause 7 - slip resistance (AS/NZS 4586) ● Clause 7 - construction tolerances between abutment of surfaces



		<ul style="list-style-type: none">• Clause 10 - gradients, crossfalls and landings• Clause 10 Ramp edging - kerb, kerb rail or other suitable ramp edging• Clause 10 - handrails and handrails extensions• Clause 11 - where there are stairs• Clause 13 - where there are doors or gates <p>Stairs</p> <p>Non-fire-isolated stairs are shown on the plans connecting the two levels of the new building.</p> <p>Details of the stairs, as shown on the plans, do not have sufficient dimensioning at this stage of the design process to assess if they comply with AS1428.1 Cl 11 Stairs (2009). At this stage of design they are shown to have handrails on both sides as well as minimum stair width between handrails.</p> <p><u>Recommended Action</u></p> <p>Ensure during ongoing design and construction all non-fire-isolated stairs to comply with AS1428.1 Cl 11 Stairs (2009) with regards to</p> <ul style="list-style-type: none">• Minimum width of 1000mm• Handrails on both sides• Handrail heights to be 865mm to 1000mm above step nosing• Handrail extensions at top and base• Tactile indicators on top and bottom landing of steps• <p>Fire-isolated Stairways</p> <p>Not applicable to proposed works.</p> <p><u>Recommended Action</u></p> <p>If fire isolated stairs are later proposed they are required to have</p> <ul style="list-style-type: none">• Minimum width between wall and handrail of
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		<p>1000mm</p> <ul style="list-style-type: none">• Single solid contrast strip to edge on stair nosings 50-75mm deep (30% contrast) to comply with AS1428.1• handrail at 865mm to 1000mm above step nosing on at least one side of the stairs to comply with AS1428.1 (2009)• Handrail extensions at landings where the handrail is not continuous• Handrails to have no vertical sections <p>Lift</p> <p>An existing lift is shown to provide vertical circulation between both levels of the building.</p> <p>No information has been provided of the dimensions and fittings of the lift.</p> <p><u>Recommended Action</u></p> <p>Ensure lift has:</p> <ol style="list-style-type: none">1. Appropriate load capacity2. Complying accessible path of travel at all levels, including wheelchair turning areas in accordance with AS1428.-2009 Clause 63. Design and fittings in accordance with AS1735 suite appropriate for the style of lift chosen. <p>Internal walkways and Turning spaces</p> <p>The corridors of the building have sufficient width to provide turning areas at any point.</p> <p><u>Recommended Action</u></p> <p>All internal accessible paths of travel, including to and within common area facilities, to comply with AS1428.1 (2009) for width, gradient, crossfall and turning spaces</p>
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		<p>Doors Internal doors have the capacity to comply with AS1428.1-2009.</p> <p><u>Recommended Action</u> Doors on all internal accessible paths of travel to have compliance with AS1428.1 (2009) with respect to:</p> <ul style="list-style-type: none">● Minimum clear openings of 850mm,● Level circulation space (gradient no greater than 1:40)● luminance contrast on doorway elements,● Opening and closing force is no greater than 20N including where a door or gate closer is fitted● Level threshold● Door circulation <p>Flooring Flooring is not required to be detailed at this stage of development.</p> <p><u>Recommended Action</u> Ensure during ongoing design and construction</p> <ol style="list-style-type: none">1. Flooring joints or abutments to have vertical rise no longer greater than 3mm or 5mm if rounded2. Flooring to have compliant slip resistance as per Table 3B, SA HB 198:2014 Guide to the specification and testing of slip resistance of pedestrian surfaces - Wet pendulum test or Oil-wet inclining platform classifications for applications where NCC does not require slip resistance3. Carpet flooring to meet requirements of BCA Part D3.3 (g) and (h) <p>Ministry Centre Undetailed rooms are shown on the plans for both</p>
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		<p>levels. They are located on an accessible path of travel and have dimensions such that a person using a wheelchair will be able to enter and use the room.</p> <p>Plans also show a number of offices and meeting rooms.</p> <p>Furniture layout will need to consider the circulation needs of a person who uses a wheelchair.</p> <p><u>Recommended Action</u> Ensure during ongoing design and construction that facilities including offices and meeting rooms are designed so that they are accessible for a person using a wheelchair as well as people with other types of disabilities.</p>
D3.4 Exemptions	✓	<p>All service areas for this development are deemed exempt due to the nature of the work required to be performed in these areas. This typically includes</p> <ul style="list-style-type: none"> ● Pump rooms ● Service areas ● Fire control rooms ● Loading docks ● Plant areas
D3.5 Car parking spaces for people with a disability	✓	<p>Car parking is shown on the plans to be provided on the same level as Level 1 of the development. Plans currently show two (2) existing accessible car parking spaces.</p> <p><u>Recommended Action:</u> Ensure during ongoing design and construction that any new or revised accessible parking is:</p> <ul style="list-style-type: none"> ● Provided at required rates ● In accordance with AS2890.6 including: <ul style="list-style-type: none"> ○ Bay dimensions ○ Shared zones



		<ul style="list-style-type: none"> ○ Overhead clearance <ul style="list-style-type: none"> ■ At bay - 2500mm ■ On path to bay - 2200mm ○ Markings as required ○ Shared zones to have bollards ● Located on an accessible path of travel
D3.6 Signage	✓	<p>At this stage of the design signage is not required to be developed.</p> <p><u>Recommended Action</u> Further assessment at the Construction Certificate stage is required.</p> <ol style="list-style-type: none"> 1. Ensure Braille and tactile signage for required exit doors stating 'Exit' and 'Level' followed by floor number. 2. Ensure signage is installed at entrances that are not accessible with directional information to the location of the nearest accessible entrance in accordance with BCA 2019 Part D3.6 (e)
D3.7 Hearing augmentation	✓	<p>At this stage of the design hearing augmentation is not required to be developed however it has not been determined whether there will be an inbuilt amplification system provided within any of the rooms including the meeting and board rooms as well as the "class" rooms.</p> <p><u>Recommended Action</u> Further assessment at Construction Certificate stage is required</p>
D3.8 Tactile indicators	✓	<p>The DA drawings do not show location of tactile indicators at top and base of non-fire isolated stairs and ramp.</p> <p><u>Recommended Action</u> Tactile indicators to be installed on the top and bottom of non-fire isolated stairs and ramp to comply with</p>



		AS1428.4.1.
D3.12 Glazing on an accessway	✓	<p>At this stage of the design visual barriers on glazing have not yet been developed.</p> <p><u>Recommended Action</u> Ensure that at time of Construction Certificate, on all glazed doors and glazed panels that form part of an accessible path of travel, provide a solid contrast line 75mm width at 900 - 1000mm and 30% luminance contrast when viewed against the floor surface or surfaces within 2m of the glazing on the opposite side</p> <p>For CC stage, show on any glazed doors, a solid contrast line 75mm width at 900 - 1000mm and 30% luminance contrast when viewed against the floor surface or surfaces within 2m of the glazing on the opposite side</p>
E3.6 Passenger lifts	✓	<p>Lifts An existing lift is proposed to link the both levels.</p> <p>Specifications of the lift were not provided for review however it was built in 2018 and complied with the BCA at the time.</p> <p><u>Recommended Action</u> The lifts require accessible features to be in accordance with E3.6b BCA 2019. To be assessed at Construction Certificate.</p>
F2.4 Accessible sanitary facilities	✓	<p>Unisex accessible toilet Plans show two (2) combined accessible toilets and showers on each level. They have the capacity to comply with AS1428.1(2009).</p> <p>Ambulant toilets Plans show single user ambulant cubicles on each level that have the capacity to comply with the requirements of AS1428.1(2009).</p>



		<p><u>Recommended Action</u></p> <p>Ensure during ongoing design and construction:</p> <ul style="list-style-type: none"><input type="checkbox"/> Accessible facilities, and ambulant toilet where provided, are located on accessible paths of travel in accordance with the requirements of AS1428.1(2009)<input type="checkbox"/> Construction certificate drawings detail compliant circulation for accessible bathroom elements with dimensions between finished surfaces.<input type="checkbox"/> Fittings and fixture to be in accordance with the requirements of AS1428.1-2009 as listed in Appendix C of this report<input type="checkbox"/> Where multiple accessible WCs are provided that there are as equal as possible distribution of transfer directions
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3.2. Building fitout

To meet the intent of the DDA, ensure during the detail design phase the following are considered for the fitout of the rooms:

- One office with internal dimensions to provide turning space and internal door circulation clear of furniture
- One meeting room with internal dimensions to provide turning space and internal door circulation clear of furniture
- Bench heights in kitchen areas should include areas that are 850mm +/- 20mm,
- Microwave and oven should be located within reach ranges of AS1428.2 (1992) -
- Dishwasher, where provided, should be located within reach ranges of AS1428.2 (1992)
- Taps should be located within 300mm of front of bench
- Under kitchen sink clearance is in accordance with AS1428.2 (1992)
- Kitchen design has sufficient length (3130mm recommended) so that all appliances and fittings are accessible
- Video intercom (height of receiver) and/or Swipe card access controls are accessible.

4. Conclusion

On the basis of our assessment, we confirm that the DA Submission architectural drawings for the Church Ministry Centre development for St Paul's Anglican Church at Carlingford have the capacity to meet:

1. Performance Requirements of the Disability (Access to Premises-Buildings) Standards 2010 and Part D3, E3.6, F2.4 of the Building Code of Australia (BCA) (2019) Amendment 1, through the deemed-to-satisfy provisions.
2. The intent and objects of the Disability (Access to Premises- Buildings) Standards (2010).

We note some further assessment in the next design stage is required to ensure adequate access compliance as highlighted in Sections 2 and 3.1 Access Assessment table above and summarised below.

Item	Recommended Action
1	Accessible paths of travel are provided to all facilities required to be accessible
2	External accessible pathways to comply with AS1428.1-2009: <ul style="list-style-type: none"> ● Clause 6 - dimensions - width and turning areas ● Clause 7 - construction tolerances between abutment of surfaces, in particular to the communal open space ● Clause 7 - cover strips at floor surface joints ● Clause 10 - gradients and crossfalls ● Clause 10 - surface abutment ● Clause 10 - ramp edging
3	All internal accessible paths of travel, including to and within common area facilities, to comply with AS1428.1 (2009) (as listed above) for: <ul style="list-style-type: none"> ● Width ● Gradient ● Crossfall ● Turning areas



	<ul style="list-style-type: none"> Construction tolerances between different surfaces on an accessible path of travel
4	<p>Doors and gates on all accessible paths of travel to have compliance with AS1428.1 (2009) with respect to:</p> <ul style="list-style-type: none"> Minimum clear openings, Level circulation space (gradient no greater than 1:40) luminance contrast on doorway elements, Opening and closing force is no greater than 20N including where a door or gate closer is fitted Level threshold
5	<p>Visual indicators on glazing to comply with AS1428.1-2009 including</p> <ul style="list-style-type: none"> be 75mm wide on all glazed windows and doors solid luminance contrast of minimum 30% from when viewed against the floor surface at a height 900-1000mm.
6	<p>All ramps and graded walkways (including step and threshold ramps) to comply with AS1428.1 including but not limited to:</p> <ul style="list-style-type: none"> Handrails on both sides with compliant diameter on ramps Handrail extensions Handrail extension returns Kerbrails or other suitable barrier Maximum distance between landings to be no greater than 9 meters where 1:14 Maximum distance between landings to be no greater than 15 meters where 1:20 Tactile ground surface indicators, where required
7	<p>All non-fire-isolated stairs to comply with AS1428.1 Cl 11 Stairs (2009) with regards to</p> <ul style="list-style-type: none"> Minimum width of 1000mm between handrails Handrails on both sides Handrail heights to be 865mm to 1000mm above step nosing Handrail extensions at top and base Tactile indicators on top and bottom landing of steps Luminance contrasting step nosings <p>Note slip resistance requirements in BCA Part D2.14 for step nosings</p>
8	<p>Lift to have dimensions to comply Lift Concession of the Premises Standards</p>



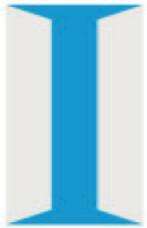
	<p>Consider provision of accessible features in accordance with E3.6b BCA 2019 Amendment 1 and AS1735 including:</p> <ul style="list-style-type: none">○ Lighting○ Control buttons - lift landing○ Control buttons - lift car○ Audible information○ Emergency hands free communication○ Passenger protection system○ Handrail
9	<p>Parking to be in accordance with either AS2890.6 including:</p> <ul style="list-style-type: none">○ Required number of accessible parking bays for visitors○ Required number of parking bays for adaptable units○ Bay dimensions○ Shared zones (accessible only)○ Overhead clearance (note these clearance requirements includes ceiling or overhead services such as electrical cabling, plumbing and fire services/sprinklers)<ul style="list-style-type: none">■ At bay - 2500mm■ On path to bay - 2200mm○ Markings as required● Shared zones to have bollards in accordance with AS2890.6● Located on an accessible path of travel
10	<p>Accessible signage to be provided in accordance with BCA2019 Amdt 1 and AS1428.1-2009 for:</p> <ol style="list-style-type: none">1. Required exit doors stating 'Exit' and 'Level' followed by floor number.2. All sanitary facilities3. Ensure signage is installed at entrances that are not accessible with directional information to the location of the nearest accessible entrance in accordance with BCA 2019 Part D3.6 (e)
11	<p>Tactile indicators to:</p> <ul style="list-style-type: none">● be installed on the top and bottom of non-fire isolated stairs to comply with AS1428.4.1.



	<ul style="list-style-type: none"> ● meet luminance contrast requirements of AS1428.4.1 ● meet slip resistance requirements of AS/NZS 4586
12	Fixtures and fittings and layout of all accessible toilet and shower to comply with AS1428.1 (2009) (See Appendix C for details)
13	<p>For all pedestrian pathways and internal flooring:</p> <ol style="list-style-type: none"> 1. As proof of provision of slip resistant surfaces for compliance with AS1428.1(2009), provide slip resistance certificates for paving and floor surfaces which are on an accessible path of travel or in areas required to accessible - As per Table 3B, HB198:2014 - Wet pendulum test or Oil-wet inclining platform classifications for applications where NCC does not require slip resistance, as detailed below. <ol style="list-style-type: none"> a. External footpaths and walkways no steeper than 1:14 Wet Pendulum P4 or Oil-wet platform test R11 b. Entries to lift lobby (Transitional areas) Wet Pendulum P2 or Oil-wet platform test R9 c. Toilet facilities Wet Pendulum P3 or Oil-wet platform test R10 d. Kitchen areas Wet Pendulum P3 or Oil-wet platform test R10 e. TGSIs (NCC requirement Table D2.14) Wet Pendulum P4 or Oil-wet platform test R11 f. Step nosings (NCC requirement Table D2.14) Wet Pendulum P4
14	<p>Luminance contrast testing prior to issuing of Occupation Certificate</p> <ol style="list-style-type: none"> a. In situ measurement of luminance contrast between the TGSI's and the substrate or pavement on which they are installed b. In situ measurement of at least 30% luminance contrast between the Stair nosing and the surrounding pavement



	<p>c. In situ measurement of at least 30% luminance contrast between the visual barriers and the pavement & flooring within 2 metres of the glazed panel or door</p> <p>d. In situ measurement of at least 30% luminance contrast between Door elements (AS1428.1 - 2009 Clause 13)</p>
15	<p>Common area carpeted flooring:</p> <ul style="list-style-type: none">● Meets the Access to Premises Standard and the BCA Part D3.3 (g) and (h) for pile height.● Edge cover strips to comply with AS1428.1-2009 Clause 7
16	<p>Pedestrian building access controls and internal security controls for areas on accessible paths of travel to be located in accordance with AS1428.1-2009</p>



Statement of Qualifications

We declare that we are appropriately qualified and competent people practising in the relevant area of work. We have recognised relevant experience in the area of work assessing disability access compliance and hold appropriately current insurance policies. (Qualifications and accreditations are listed below)

Full Name	Jane Bryce
Company	Cheung Access Pty Ltd
Address	GPO Box 1380, Sydney NSW 2001
Qualifications and Accreditations	<ol style="list-style-type: none">1. Diploma of Arts (Habilitation Studies – Orientation & Mobility)2. Grad Dip Rehabilitation Counselling3. Cert IV Workplace Assessment and Training4. Cert IV Access Consulting5. Accredited with the Association of Consultants in Access, Australia Member No. 200 
Signature	
Date	7 December 2021

Full Name	Christine Cheung
Company	Inclusive Places (trading as Cheung Access Pty Ltd)
Address	GPO Box 1380, Sydney NSW 2001
Qualifications and Accreditations	<ul style="list-style-type: none">• B. App Sc (Occupational Therapy), Masters of Environmental Studies• Registered Occupational Therapist (Occupational Therapy Board/ AHPRA)• Accredited with the Association of Consultants in Access



inclusive
places

	
Signature	
Date	7 December 2021



Appendix A: Drawings Received

Preliminary Drawings prepared by Stanton Dahl

Drawing No	Drawing Title	Revision
DA00	Cover Sheet	DA01
DA01	Site Analysis Plan	DA01
DA02	Site Plan/Roof Plan	DA01
DA03	Proposal Ground Floor	DA01
DA04	Proposal First Floor	DA01
DA05	Elevations	DA01
DA06	Elevations & Sections	DA01
DA07	Shadow Diagrams - Winter	DA01
DA08	Shadow Diagrams - Winter	DA01
DA09	Shadow Diagrams - Winter	DA01
DA10	Shadow Diagrams - Winter	DA01
DA11	Height Limit Diagram & Signage	DA01

Survey Drawing Schedule

Detail and Level Survey of Lot 34 in DP251044	C
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Civil Drawing Schedule

C00	Civil Construction Notes	A
C01	Sediment Erosion and Control Plan	A
C02	Sediment Erosion and Control Details	A
C03	Bulk Earthworks Plan	A
C04	Demolition Plan	A
C05	Retaining Wall Plan	A
C06	Retaining Wall Details	A

Landscape Drawing Schedule

L/00	Cover Sheet	A
L/01	Proposed Landscape Plan	A

Appendix B: BCA Part D3 - Access for People with a Disability

Below is a list of Building Code of Australia (BCA) Part D3 requirements relating to access requirements for people with a disability in Class 9b Buildings.

Clause	Requirements
D3.1 General building access requirements Class 9b	To and within all areas normally used by the occupants.
D3.2 Access to buildings	<p>(a) An accessway must be provided to a building required to be accessible—</p> <ul style="list-style-type: none"> (i) from the main points of a pedestrian entry at the allotment boundary; and (ii) from another accessible building connected by a pedestrian link; and (iii) from any required accessible carparking space on the allotment. <p>(b) In a building required to be accessible, an accessway must be provided through the principal pedestrian entrance, and—</p> <ul style="list-style-type: none"> (i) through not less than 50% of all pedestrian entrances including the principal pedestrian entrance; and (ii) in a building with a total floor area more than 500 m², a pedestrian entrance which is not accessible must not be located more than 50 m from an accessible pedestrian entrance, except for pedestrian entrances serving only areas exempted by D3.4. <p>(c) Where a pedestrian entrance required to be accessible has multiple doorways—</p> <ul style="list-style-type: none"> (i) if the pedestrian entrance consists of not more than 3 doorways — not less than 1 of those doorways must be accessible; and (ii) if a pedestrian entrance consists of more than 3 doorways — not less than 50% of those doorways must be accessible. <p>(d) For the purposes of (c)—</p> <ul style="list-style-type: none"> (i) an accessible pedestrian entrance with multiple doorways is considered to be one pedestrian entrance where—



	<p>(A) all doorways serve the same part or parts of the building; and</p> <p>(B) the distance between each doorway is not more than the width of the widest doorway at that pedestrian entrance (see Figure D3.2); and</p> <p>(ii) a doorway is considered to be the clear, unobstructed opening created by the opening of one or more door leaves (see Figure D3.2).</p> <p>(e) Where a doorway on an accessway has multiple leaves, (except an automatic opening door) one of those leaves must have a clear opening width of not less than 850 mm in accordance with AS 1428.1.</p>
<p>D3.3 Parts of building to be accessible</p>	<p>In a building required to be accessible—</p> <p>(a) every ramp and stairway, except for ramps and stairways in areas exempted by D3.4, must comply with—</p> <p>(i) for a ramp, except a fire-isolated ramp, clause 10 of AS 1428.1; and</p> <p>(ii) for a stairway, except a fire-isolated stairway, clause 11 of AS 1428.1; and</p> <p>(iii) for a fire-isolated stairway, clause 11.1(f) and (g) of AS 1428.1; and</p> <p>(b) every passenger lift must comply with E3.6; and</p> <p>(c) accessways must have—</p> <p>(i) passing spaces complying with AS 1428.1 at maximum 20 m intervals on those parts of an accessway where a direct line of sight is not available; and</p> <p>(ii) turning spaces complying with AS 1428.1—</p> <p>(A) within 2 m of the end of accessways where it is not possible to continue travelling along the accessway; and</p> <p>(B) at maximum 20 m intervals along the accessway; and</p> <p>(d) an intersection of accessways satisfies the spatial requirements for a passing and turning space; and</p> <p>(e) a passing space may serve as a turning space; and</p> <p>(f) a ramp complying with AS 1428.1 or a passenger lift need not be provided to serve a storey or level other than the entrance storey in a Class 5, 6, 7b or 8 building—</p> <p>(i) containing not more than 3 storeys; and</p>



	<p>(ii) with a floor area for each storey, excluding the entrance storey, of not more than 200 m² ; and</p> <p>(g) clause 7.4.1(a) of AS 1428.1 does not apply and is replaced with 'the pile height or pile thickness shall not exceed 11 mm and the carpet backing thickness shall not exceed 4 mm'; and</p> <p>(h) the carpet pile height or pile thickness dimension, carpet backing thickness dimension and their combined dimension shown in Figure 8 of AS 1428.1 do not apply and are replaced with 11 mm, 4 mm and 15 mm respectively.</p>
<p>D3.4 Exemptions</p>	<p>The following areas are not required to be accessible:</p> <p>(a) An area where access would be inappropriate because of the particular purpose for which the area is used.</p> <p>(b) An area that would pose a health or safety risk for people with a disability.</p> <p>(c) Any path of travel providing access only to an area exempted by (a) or (b).</p>
<p>D3.5 Car parking spaces for people with a disability</p>	<p>Accessible carparking spaces—</p> <p>(a) subject to (b), must be provided in accordance with Table D3.5 in—</p> <p style="padding-left: 20px;">(i) a Class 7a building required to be accessible; and</p> <p style="padding-left: 20px;">(ii) a carparking area on the same allotment as a building required to be accessible; and</p> <p>(b) need not be provided in a Class 7a building or a carparking area where a parking service is provided and direct access to any of the carparking spaces is not available to the public; and</p> <p>(c) subject to (d), must comply with AS/NZS 2890.6; and</p> <p>(d) need not be designated where there is a total of not more than 5 carparking spaces, so as to restrict the use of the carparking space only for people with a disability.</p> <p>To be calculated by multiplying the total number of carparking spaces by the percentage of—</p> <p style="padding-left: 20px;">(i) accessible sole-occupancy units to the total number of sole-occupancy units; or</p> <p style="padding-left: 20px;">(ii) accessible bedrooms to the total number of bedrooms; and</p>



	<p>the calculated number is to be taken to the next whole figure. 1 space for every 100 carparking spaces or part thereof.</p>
D3.6 Signage	<p>In a building required to be accessible—</p> <ul style="list-style-type: none">(a) braille and tactile signage complying with Specification D3.6 must—<ul style="list-style-type: none">(i) incorporate the international symbol of access or deafness, as appropriate, in accordance with AS 1428.1 and identify each—<ul style="list-style-type: none">(A) sanitary facility, except a sanitary facility within a sole-occupancy unit in a Class 1b or Class 3 building; and(B) space with a hearing augmentation system; and(ii) identify each door required by E4.5 to be provided with an exit sign and state—<ul style="list-style-type: none">(A) "Exit"; and(B) "Level" ; and either<ul style="list-style-type: none">(aa) the floor level number; or(bb) a floor level descriptor; or(cc) a combination of (aa) and (bb); and(b) signage including the international symbol for deafness in accordance with AS 1428.1 must be provided within a room containing a hearing augmentation system identifying—<ul style="list-style-type: none">(i) the type of hearing augmentation; and(ii) the area covered within the room; and(iii) if receivers are being used and where the receivers can be obtained; and(c) signage in accordance with AS 1428.1 must be provided for accessible unisex sanitary facilities to identify if the facility is suitable for left or right handed use; and(d) signage to identify an ambulant accessible sanitary facility in accordance with AS 1428.1 must be located on the door of the facility; and(e) where a pedestrian entrance is not accessible, directional signage incorporating the international symbol of access, in accordance with AS 1428.1 must be provided to direct a person to the location of the nearest accessible pedestrian entrance; and



	<p>(f) where a bank of sanitary facilities is not provided with an accessible unisex sanitary facility, directional signage incorporating the international symbol of access in accordance with AS 1428.1 must be placed at the location of the sanitary facilities that are not accessible, to direct a person to the location of the nearest accessible unisex sanitary facility.</p>
<p>D3.7 Hearing augmentation</p>	<p>(a) A hearing augmentation system must be provided where an inbuilt amplification system, other than one used only for emergency warning, is installed—</p> <ul style="list-style-type: none"> (i) in a room in a Class 9b building; or (ii) in an auditorium, conference room, meeting room or room for judicatory purposes; or (iii) at any ticket office, teller's booth, reception area or the like, where the public is screened from the service provider. <p>(b) If a hearing augmentation system required by (a) is—</p> <ul style="list-style-type: none"> (i) an induction loop, it must be provided to not less than 80% of the floor area of the room or space served by the inbuilt amplification system; or (ii) a system requiring the use of receivers or the like, it must be available to not less than 95% of the floor area of the room or space served by the inbuilt amplification system, and the number of receivers provided must not be less than— <ul style="list-style-type: none"> (A) if the room or space accommodates up to 500 persons, 1 receiver for every 25 persons or part thereof, or 2 receivers, whichever is the greater; and (B) if the room or space accommodates more than 500 persons but not more than 1000 persons, 20 receivers plus 1 receiver for every 33 persons or part thereof in excess of 500 persons; and (C) if the room or space accommodates more than 1000 persons but not more than 2000 persons, 35 receivers plus 1 receiver for every 50 persons or part thereof in excess of 1000 persons; and (D) if the room or space accommodates more than 2000 persons, 55 receivers plus 1 receiver for every 100



	<p>persons or part thereof in excess of 2000 persons.</p> <p>(c) The number of persons accommodated in the room or space served by an inbuilt amplification system must be calculated according to D1.13.</p> <p>(d) Any screen or scoreboard associated with a Class 9b building and capable of displaying public announcements must be capable of supplementing any public address system, other than a public address system used for emergency warning purposes only.</p>
<p>D3.8 Tactile indicators</p>	<p>(a) 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"> (i) a stairway, other than a fire-isolated stairway; and (ii) an escalator; and (iii) a passenger conveyor or moving walk; and (iv) a ramp other than a fire-isolated ramp, step ramp, kerb ramp or swimming pool ramp; and (v) in the absence of a suitable barrier— <ul style="list-style-type: none"> (A) an overhead obstruction less than 2 m above floor level, other than a doorway; and (B) an accessway meeting a vehicular way adjacent to any pedestrian entrance to a building, excluding a pedestrian entrance serving an area referred to in D3.4, if there is no kerb or kerb ramp at that point, except for areas exempted by D3.4. <p>(b) Tactile ground surface indicators required by (a) must comply with sections 1 and 2 of AS/NZS 1428.4.1.</p> <p>(c) A hostel for the aged, nursing home for the aged, a residential aged care building Class 3 accommodation for the aged, Class 9a health-care building or a Class 9c building need not comply with (a)(i) and (iv) if handrails incorporating a raised dome button in accordance with the requirements for stairway handrails in AS 1428.1 are provided to warn people who are blind or have a vision impairment that they are approaching a stairway or ramp.</p>



<p>D3.11 Ramps</p>	<p>On an accessway—</p> <ul style="list-style-type: none"> (a) a series of connected ramps must not have a combined vertical rise of more than 3.6 m; and (b) a landing for a step ramp must not overlap a landing for another step ramp or ramp.
<p>D3.12 Glazing on an accessway</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 AS1428.1.</p>
<p>E3.6 Passenger lifts</p>	<p>In an accessible building, every passenger lift must—</p> <ul style="list-style-type: none"> (a) be one of the types identified in Table E3.6a, subject to the limitations on use specified in the Table; and (b) have accessible features in accordance with Table E3.6b; and (c) not rely on a constant pressure device for its operation if the lift car is fully enclosed.
<p>F2.4 Accessible sanitary facilities</p>	<p>In a building required to be accessible—</p> <p><i>SA F2.4(a)</i></p> <ul style="list-style-type: none"> (a) accessible unisex sanitary compartments must be provided in accessible parts of the building in accordance with Table F2.4(a); and <p><i>SA F2.4(b)</i></p> <ul style="list-style-type: none"> (b) accessible unisex showers must be provided in accordance with Table F2.4(b); and (c) 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, a sanitary compartment suitable for a person with an ambulant disability in accordance with AS 1428.1 must be provided for use by males and females; and (d) an accessible unisex sanitary compartment must contain a closet pan, washbasin, shelf or bench top and adequate means of disposal of sanitary towels; and (e) the circulation spaces, fixtures and fittings of all accessible sanitary facilities provided in accordance with Table F2.4(a) and Table F2.4(b) must comply with the requirements of AS 1428.1; and



	<ul style="list-style-type: none">(f) an accessible unisex sanitary facility must be located so that it can be entered without crossing an area reserved for one sex only; and(g) 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(h) 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(i) an accessible unisex sanitary compartment or an accessible unisex shower need not be provided on a storey or level that is not required by D3.3(f) to be provided with a passenger lift or ramp complying with AS 1428.1.
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Appendix C - Sanitary Fittings

Accessible Sanitary Facilities Fittings guidelines

Recommendations

- Ensure during ongoing design and construction that
 - Combined accessible shower and WC sanitary facilities meet the circulation spaces of AS1428.1-2009
- Provision of required fittings for accessible sanitary facilities in accordance with requirements of AS1428.1-2009 including:
 - i) *Door hardware (AS1428.1-2009; Clause 13.5)*
 - (1) Door privacy snib with 45mm “handle” measured from centre of spindle
 - (2) Door handles to be
 - (a) preferred D-type if lever style handle provided on hinged doors
 - (b) 35 to 45 mm clearance between handle and door surface
 - (c) 20mm return on handle to enable operation by one hand
 - (d) installed at 1000mm +/- 10mm above finished floor level (AFFL)
 - (3) Door operating forces not to exceed 20 N
 - ii) *Toilet pan (AS1428.1-2009 Clause 15.2.2)*
 - (1) Top of seat to be 460mm to 480mm AFFL
 - (2) Centre line of pan to adjacent wall to be 450mm to 460mm
 - (3) Front of pan to be 800mm +/- 10mm from finished wall behind toilet
 - iii) *Toilet seat (AS1428.1-2009; Clause 15.2.3)*
 - (1) Provide minimum 30 % luminance contrast with its setting
 - iv) *Toilet backrest (AS1428.1-2009; Clause 15.2.4)*
 - v) *Toilet paper dispenser (AS1428.1-2009; Clause 15.2.6)*
 - (1) To be installed so that it does not block access to grabrail or create an impingement risk
 - (2) Outlet to be 300mm maximum from front of pan and no higher than 700mm above finished floor level (AS1428.1:2009 Figure 41)
 - (3) Dispenser not to intrude into required toilet pan circulation
 - vi) *Grabrails (AS1428.1-2009; Clause 15.2.7 and figure 42)*
 - (1) Ensure toilet grabrails are installed in accordance with Clause 15.2.7 and Figure 42
 - (2) Ensure grabrails for shower are installed in accordance with AS1428.1:2009 Clause 15.5.4 and figures 47 and 48 including vertical shower head support grabrail
 - vii) *Baby change tables AS1428.1-2009, Clause 15.2.8.2)*
 - (1) Ensure baby change table when in the folded position does not protrude into any other bathroom fitting circulation space
 - (2) Maximum operable height of top of table is 820mm
 - (3) Minimum under table clearance is 720mm



- (4) Does not block installation of other bathroom fittings such as coat hooks
 - viii) *Mirror (AS1428.1-2009, Clause 15.4.2)*
 - (1) Vertical mirror to be installed above basin measuring
 - (a) 350mm wide
 - (b) Base of mirror to be located no more than 900mm AFFL
 - (c) Upper edge of mirror to be no less than 1850mm AFFL
 - ix) *Washbasin shelf (AS1428.1-2009, Clause 15.4.2)*
 - (1) As a part of a vanity unit – 120mm wide by 300mm minimum in depth without intruding into required circulation area for basin
 - (2) As a separate shelf
 - (a) Not to intrude into required washbasin circulation
 - (b) Height to be 900mm to 1000mm
 - (c) Width 120mm minimum
 - (d) Length 300 to 400mm
 - (e) Recommend shelf be installed on wall beside existing basin
 - x) *Soap dispenser, paper towel dispenser and hand dryer for washbasin (AS1428.1-2009; Clause 15.4.3)*
 - (1) to be operable by one hand,
 - (2) outlet to be 900 to 1100mm AFFL;
 - (3) to be located 500mm minimum from any internal corner
 - (4) Note handrail is where provided
 - xi) *Clothes hanging devices (AS1428.1-2009; Clause 15.5.10)*
 - (1) two to be provided;
 - (2) installed 1200 to 1350 mm AFFL;
 - (3) 200 +/- 10mm between hooks;
- o Sanitary facility walls may need to be strengthened for installation of grab rails so as to meet the required force ratings of 1100 N