



Building Code of Australia 2019 Amendment 1 & DDA Premises Standards Review (Accessibility Report)

## Development Application (DA)


9 Byrnes Street, Broadwater NSW – Broadwater Public School

Prepared for: ADCO Constructions Pty Limited  
Our Ref: 23000412 | Issue date: 17 October 2023

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## Report Revision

Revision	Comment / Reason for Issue	Issue Date	Prepared by
1	Access Report for Development Application (DA)	24/07/2023	Jhoana Colorado  Senior Access Consultant ACAA Associate Member No. 713
This Report is Based on Documentation Presented By: Pedavoli Architects (Architect).			
Issue to: ADCO Constructions Pty Limited			
Drawings assessed are as follows: BRO - ARC - PP - DWG – 010 A, BRO - ARC - PP - DWG – 015 A, BRO - ARC - PP - DWG – 100 A, BRO - ARC - PP - DWG – 110 A, BRO - ARC - PP - DWG – 120 A, BRO - ARC - PP - DWG – 300 A, BRO - ARC - PP - DWG – 200 A and BRO - ARC - PP - DWG – 201 A.			

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# 1. Executive Summary

Modern Building Consultants (MBC Group) as the appointed Access Consultant for the proposed development of the Broadwater Public School located at 9 Byrnes Street, Broadwater NSW for Development Application (DA) submission prepared by Pedavoli Architects Pty Ltd. This report has taken into consideration all aspects of accessibility to the site and throughout the development and with reference to the National Construction Code - Building Code of Australia Volume One 2019 (*Amendment 1*), DDA (Access to premises- Buildings) Standards 2010, relevant Australian Standards (AS1428) suite, as these relate to access to premises and the spirit and intent of the Disability Discrimination Act 1992 (Cth) (DDA).

As the design progresses, further review of documentation shall be undertaken to ensure that compliance with the accessibility provisions of the BCA and relevant standards are achieved.

## 1.1 Project Description

The existing buildings at Broadwater Public School, 9 Byrnes Street, Broadwater (Lot 4 & 5, Deposited Plan (DP) 1043232 and Lot 501 DP 755624) were significantly inundated during the February 2022 floods and most of the structures are no longer habitable due to the damages caused by the flood waters. As a result, the NSW Department of Education is proposing to demolish the existing school buildings and construct a new elevated school building to replace it. The floor level of the new building will be located above the design flood level to increase flood resistance and create useable undercroft spaces.

A development application will be submitted to Richmond Valley Council for these works. Works will comprise the following:

Site preparation including site establishment works, earthworks and relocation of heritage bell.

- Demolition of existing school buildings.
- Construction of a new elevated school building, with at-grade (undercroft) amenities and
- storage, including:
  - Ground Level:
    - Open undercroft space for covered outdoor learning and play
    - Male and female amenities and accessible toilet / change room facility.
    - Cleaners Store.
    - Sports Store.
    - Equipment and general store.
  - Elevated Level:
    - New administration comprising interview room, clerical spaces,
    - Principal's office, staff room, sick bay, store and male, female and accessible amenities.
    - School library with computer room, store, main communications room and

- library office.
  - Three (3) General Learning Spaces (GLS) with learning commons and multi-purpose space.
  - Canteen with open servery space.
  - Store.
  - Male, female and accessible amenities.
  - Mechanical plant.
- New hard and soft landscaping including replacement playing field, playground, half games court and vegetable garden and new yarning circle.

It is not proposed to increase staff or student numbers as a result of these works.

## 1.2 Performance Solutions – Accessibility

The assessment of the design documentation has revealed that the following areas are required to be assessed against the relevant Performance Requirements of the BCA.

DTS Clause	Description of Non-Compliance	Performance Requirement
D3.	(L1) GLS– Sliding doors in the proposed layout do not feature the required circulation at the latch under AS1428.1. This is a departure from BCA Part D3.	DP1
F2	Ground floor female and male bank of toilets lack an adjacent unisex accessible WC. This is a departure from BCA and DDA Premises Standards.	FP2.1

## 1.3 Exemption Area(s)/Room(s) Under NCC BCA (Amendment 1) D3.4

The assessment of the documentation has revealed that the following area(s) or room(s) require further documentation to demonstrate that these areas are inappropriate due to their specific use and present a health risk to people with disabilities. Therefore, they do not comply with the prescriptive provisions of the BCA.

DTS Clause	Description of Non-Compliance	Performance Requirement
D3	-Ground equipment store & store equipment -L1 plant and store, KLA store and SEC store	D3.4

This generally applies to plant rooms and other areas used occasionally by maintenance personnel. It should not be used for exempting wheelchair access from these areas.



Where the above is applicable the client must provide a letter detailing why this is applicable (e.g. store of heavy equipment, furniture, hazard substances, etc) to this building and clearly note locations.

## 2. Introduction

MBC Group have been engaged by ADCO Constructions Pty Limited to conduct an Accessibility Assessment Report of the architectural documentation for the Broadwater Public School located at 9 Byrnes Street, Broadwater NSW for Development Application (DA) submission prepared by Pedavoli Architects (Architect).

### 2.1 Purpose

The purpose of this report is to assess the current architectural design documentation at Schematic Design Stage with respect to the accessibility provisions of the National Construction Code – Building Code of Australia Volume 1, (*Amendment 1*) Edition 2019, as are principally contained within Parts D3, F2, E3 and DDA (Access to premises- Buildings) 2010 Standards and the Australian Standards suite (AS) as this prescribes the minimum requirement for access to a building. The report is therefore to assess the current design proposal against the above provisions and to outline those areas, if any, where:

- Compliance is not achieved
- Areas may warrant redesign to achieve compliance.

### 2.2 Assessment Methodology and BCA

The methodology applied in undertaking this assessment has included the following statutory requirements:

- A review of architectural plans, as listed above in the report revision section.
- NCC BCA 2019 (*Amendment 1*). Detailed assessment specific of:
  - Part D3 - Access for People with Disability
  - Part E3 - Lift Installations
  - Part F2 - Sanitary and other Facilities

### 2.3 National Legislation

- Disability Discrimination Act, 1992, Government of Australia, <http://www.legislation.gov.au>
- Disability (Access to Premises – Buildings) Standards, 2010, Government of Australia, <https://www.legislation.gov.au/Details/F2010L00668>
- Disability (Access to Premises – Buildings) Amendment Standards 2020 Government of Australia, <https://www.legislation.gov.au/Details/F2020L01245>

### **Applicable Building Code of Australia (BCA)**

Pursuant to S6.28 of the Environmental Planning and Assessment Act 1979, the proposed building is subject to compliance with the relevant requirements of the BCA as in force at the time of the date of invitation for tenders to carry out the Crown building work.

The new BCA 2022 came into effect on the 1<sup>st</sup> of May 2023. As the date of invitation for tenders to carry out the Crown building work was made prior to this date, the BCA in force is BCA 2019 Amendment 1. As this was applicable at the time of tender.

### **Disability Discrimination Act 1992 (Cth) (DDA)**

The accessibility assessment process covers all aspects of the infrastructure (premises), to the extent required to meet the objectives of the Disability Discrimination Act 1992 (Cth), including, however not limited to, Section 23 which relates to access to premises and facilities which the public may enter or use.

The act is enforced primarily through a complaints mechanism, which allows individuals who have directly or indirectly experienced unlawful discrimination to seek a conciliated outcome through the Australian Human Rights Commission and in the instance of unsuccessful conciliation, to bring an action in the Federal Magistrates Court or the Federal Court of Australia.

### **Disability (Access to Premises- Buildings) Standards 2010 – General**

Part 1, Clause 1.3 Objects

- a. “to ensure that dignified, equitable, cost effective and reasonably achievable access to buildings, and facilities and services within buildings, is provided with a disability; and
- b. to give certainty to building certifiers, building developers and building managers that, if access to 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 Act.”

In contrast to building regulations, the DDA is not prescriptive. The implementation of the Premises Standards in 2010, and corresponding changes to the BCA, is a significant step towards achieving equal access to premises and is crucial to justice and social inclusion for people with disabilities.

It is noted that the Premises Standards are limited in scope, covering aspects of building compliance applicable under the BCA. It is acknowledged that the Premises Standards could address a broader range of accessibility issues including considerations to accessibility of parkland, playgrounds, transport vehicles, interior fit-out of buildings, and fixtures and fittings. As such, there are features which fall beyond the scope of the standards which may be subject to the general complaint’s provisions of the DDA.

## Australian Standards for Access and Mobility

- AS 1428.1:2009 - Part 1 General requirements for access – New building work
- AS 1428.2:1992 - Enhanced and additional requirements – Part 2 Buildings and facilities
- AS1428.4: 1:2009 - Part 4.1 – Means to assist the orientation of people with vision impairment – TGS1
- AS1735.12:1999 – Lift, escalators and moving walks Facilities for persons with disability.
- Richmond Valley Local Council DCP.

## Reference and Guidelines

- Guide to the BCA, Current Version, Australian Building Codes Board, [www.abcb.gov.au](http://www.abcb.gov.au)
- Guideline on the Application of The Premises Standards, 2013, Australian Human Rights Commission, <https://humanrights.gov.au/our-work/disability-rights/guidelines-application-premises-standards>
- Guide to the BCA, Current Version, Australian Building Codes Board, [www.abcb.gov.au](http://www.abcb.gov.au)
- Guideline on the Application of The Premises Standards, 2013, Australian Human Rights Commission, <https://humanrights.gov.au/our-work/disability-rights/guidelines-application-premises-standards>
- AS1428.2:1992 Enhanced and Additional requirements <https://www.saiglobal.com/PDFTemp/Previews/OSH/as/as1000/1400/14282.pdf>
- AS1428.4.1 Draft Way-finding Standard <https://store.standards.org.au/reader/as-1428-4-2-2018?preview=1>
- Advisory Note February 2013 on streetscape, public, outdoor areas, fixtures, fittings and furniture, <https://humanrights.gov.au/our-work/disability-rights/publications/advisory-note-streetscape-public-outdoor-areas-fixtures>
- Advisory Note on the streetscape, public outdoor areas, fixtures, fittings, and furniture (2013).
- BCA Part H2.

## 2.4 Accessibility and Inclusion

This report aims to provide achievable recommendations related to the provision of access to premises based on current legislation and best practice options, enabling independent, equitable and functional access for all.



The Access is paramount in providing an inclusive environment for all users within the community. The Access Code is focused on ensuring that all users are equally catered for in society.

Where possible and practicable Universal Design (UD) principles are to be incorporated as this will ensure a holistic approach in the provision of access for all members of society.

### **Universal Design Principals (x7)**

These principals are recommended to be taken in consideration from the outset of the project and are as follows:

1. **SIMPLE AND INTUITIVE USE** – Use of the design is easy to understand by the users, regardless of the user's experience, knowledge, language skills, or current concentration level. No manuals or protocols are required to achieve this principal. Example: Control buttons on specific equipment for common use (staff and students) are labelled with text and symbols that are simple and intuitive to understand.
2. **FLEXIBILITY IN USE** - The design accommodates a wide range of users, preferences and abilities, regardless of the user's physical abilities, age, experience, knowledge, language skills, etc. Example: A civic facility that allows a visitor to choose to read or listen to a description of the contents of a display case employs this principle.
3. **EQUITABLE USE** - The design is useful and caters to people with diverse abilities. Example: Online content that is designed so that it is accessible to everyone, including students who are blind and using text-to-speech software.
4. **SIZE AND SPACE FOR APPROACH AND USE** - The design provides a clear line of sight to important elements for all users. The design is to be reachable, with all of its components able to be reached comfortably for any seated or standing user. Furthermore, the design requires accommodating a variation for hand and grip size and suitable space/areas for use of assistive devices or personal assistance. Example: Adjustable workbenches for students and adjustable desks for staff.
5. **LOW PHYSICAL EFFORT** - The design can be used effortlessly. Example: Automated doors, windows, lighting, air-conditioning, etc. Sensor doors and basin and sink taps/water mixers.
6. **TOLERANCE FOR ERROR** - The design is useful and can cater to people with diverse abilities, regardless of the user's physical abilities, age, experience, knowledge, language skills, etc. Example: Online content that is designed to be accessible to everyone, including students/teachers who are blind or partially blind or students/teachers using text-to-speech software.
7. **PERCEPTIBLE INFORMATION** - The design is efficient in communicating the necessary information successfully to the user. Example: Broadcasting television closed captions for user (students/teachers) with hearing loss.

## 2.5 Report Limitations and Exclusions

This report is based upon, and limited to, the information depicted in the documentation provided for assessment and does not make any assumptions regarding design intention or the like.

This assessment does not contain comments regarding detailed design issues such as (but not limited to): luminance contrast, slip resistance, handrail design, door schedules and door hardware specifications, hearing augmentation systems, location of fittings within sanitary compartments and lift specifications. This assessment will be done at Crown Certification stage.

This report does not include, or imply compliance with:

- Work Healthy & Safety Act 2011 and Regulations;
- Work Cover Authority requirements;
- Structural and Services Design Documentation;
- Any parts of the BCA or any standards other than those directly referenced in this report.
- Drawings that are not in the report revision above.
- Fittings and fixtures that have not been provided in the documentation provided by the architect or designer will be excluded from this review.
- Crossfalls and floor levels that are not included into the documentations will be excluded from this review.
- The Educational Facilities Standards & Guidelines (EFSG) assessment is excluded from this review. <https://education.nsw.gov.au/about-us/efsg>

### 3. Building Characteristics

#### 3.1 Location and Description

The proposed development comprises new block A and B in an existing school facility and associated works linking with existing buildings.

The site is located at 9 Byrnes Street, Broadwater NSW – Broadwater Public School.



#### 3.2 BCA Assessment Data

In the context of this report and the BCA the building use can be classified as follows;

Certification	Descriptions	Access Requirements
Class 9b	School	to and within all areas normally used by the occupants.
Class 5	Admin/Office	to and within all areas normally used by the occupants.

### 3.3 Exceptions and Concessions

The following rooms / areas and associated accessways have been afforded the concession under D3.4 and access for people with disabilities need not be provided to these areas:

- Ground equipment store & store equipment
- L1 plant and store, KLA store and SEC store

The school is existing, therefore this report applies to new works and the affected part, as defined by the Disability (Access to Premises – Building) Standards 2010, hereinafter referred to the Premises Standards or,

A Performance Based Solution approach may be employed to justify the departures from code (*where applicable to be detailed at a later details design stage*).

## 4. Mandatory Requirements Accessibility Assessment & Recommendations for Access for People with a Disability

The following details the accessibility compliance of the proposed development. The assessment is limited to the significant issues ascertainable from the current level of design detail. Further detailed assessment will be required at the Detailed Design Stage to demonstrate full compliance with the relevant access provisions.

### 4.1 Accessibility Compliance (Affected Part)

Premises Standards 2010 - Part 2.1 Clause 5 mandates:

#### **Access for People with Disabilities – Affected Part Upgrade**

Commonwealth Disability (Access to Premises- Buildings) Standards 2010 (DAPS)

Clause 2.1 (a) and (b) of the Access to Premises Standard states that the following must comply with the Access Standards:

- Any new building (an application after 1 May 2011)
- Any new part (new works) and
- Any affected part of an (existing) building.

An affected part (as defined in the Premises Standards) is:

- a) The principal pedestrian 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 including ramps and lifts as necessary.

Compliance Comments
<p>RL levels are not yet provided, however, path of travel from allotment boundary to new buildings and facilities appears to be on grade.</p> <p>Ensure continuous accessible path of travel is provided and compliant with AS1428.1 Clause 7.</p> <p><b>Currently, requirement appears capable of being achieved.</b></p>

## 4.2 NCC BCA Part D3 – Access to Buildings (Site Connections)

An accessway to the building must be provided with a continuous accessible path of travel (CAPT) compliant with AS1428.1. Specific components are as follows:

- from the main points of a principal pedestrian entry (PPE) to the allotment boundary; and
- from another accessible building (new or existing) connected by a pedestrian link; and
- from any required accessible carparking space (new or existing) on the allotment.

### Compliance Comments

RL levels are not yet provided, however, path of travel from allotment boundary to new buildings and facilities appears to be on grade.

Ensure continuous accessible path of travel is provided and compliant with AS1428.1 Clause 7.

**Currently, requirement appears capable of being achieved.**

## 4.3 NCC BCA Part D3 – Access to Buildings (Entrances)

In a building required to be accessible, an accessway compliant with AS1428.1 must be provided through the principal pedestrian entrance (PPE), and;

- through no less than 50% of all pedestrian entrances including the principal pedestrian entrance; and
- in a building with a total floor area more than 500 m<sup>2</sup>, 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 (service maintenance areas D3.4 Clause).

Where a pedestrian entrance required to be accessible has multiple doorways, these are to be accessible and;

- if the pedestrian entrance consists of no more than 3 doorways – no less than 1 of those doorways must be accessible; and
- if a pedestrian entrance consists of more than 3 doorways – no less than 50% of those doorways must be accessible.

For the purposes of (3); an accessible pedestrian entrance with multiple doorways is considered to be one pedestrian entrance where –

- all doorways serve the same part or parts of the building must comply with AS1428.1; and



- the distance between each doorway is not more than the width of the widest doorway at that pedestrian entrance; and

A doorway is considered to be the clear, unobstructed opening created by the opening of one or more door leaves.

- 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 no less than 850 mm with standard 920mm door leaf in accordance with AS 1428.1 Figures 31 and 32.
- A single door is to ensure a clear opening width of no less than 850 mm with standard 920mm door leaf in accordance with AS 1428.1 Figures 31 and 32.

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 accordance with NCC BCA D3.

Where there are level differences between internal and external areas. The threshold ramp is to be provided in accordance with AS1428.1.

#### Compliance Comments

There are stairs proposed (x2) linking ground to L1. Lift access has been provided adjacent to entry stair. This is in accordance with NCC BCA and DDA Premises Standards.

Ensure continuous accessible path of travel is provided and compliant with AS1428.1 Clause 7.

**Currently, requirement appears capable of being achieved.**

#### 4.4 Continuous Accessible Path of Travel (CAPT)

A continuous accessible path of travel is defined as an uninterrupted pathway to and from within a premises or building environment which provides linkage to all programs, goods and services within a premises or building. Therefore, the following items are located via this pathway.

- All continuous accessible paths of travel are to ensure compliance with AS1428.1. Clause 7 with 1-metre minimum clear circulation and 2.1-metres above FFL.
- Where a manual doorway on an continuous accessible path of travel (CAPT) has multiple leaves, (except an automatic opening door) one of those leaves must have a clear opening width of not less than 850 mm with standard 920mm door leaf in accordance with AS 1428.1 Figures 31 and 32.
- Where manual door latch side cannot be achieved, the door is to be automated.
- A single manual door on an continuous accessible path of travel (CAPT) is to ensure a clear opening width of no less than 850 mm with standard 920mm door leaf in accordance with AS 1428.1 Figures 31 and 32.

- Doorway threshold ramp is to have a 1:8 gradient, 35mm max. height and 280mm max. length, compliant with AS1428.1. (Note: No threshold ramps are allowed inside of the building under the BCA unless open to a road, open space or are in a building class 9a)
- The distance between successive doorways in a vestibule serving an area required to be accessible is to be 1450mm (excluding the swing doors)
- 2000mm L x 1800mm W (passing bay) is to be provided where there is no line of sight (2-way corner/ L shape)
- 1500mm x 1500mm (+splay) clear circulation space is to be provided to achieve 90-degree turn.
- 2-metre length or over corridors are to provide 1540mm x 2070mm minimum clear circulation space to achieve 180-degrees.

#### Compliance Comments

Provided documentation has been reviewed.

-L1 (GLS) doors lack of 530mm latch side clearance. This can be address under a Performance Solution during a later stage. There is sufficient space for amendments to be made to readily achieve compliance during a further stage.

**Currently, requirement appears capable of being achieved.**

#### 4.5 Stairs, Ramps and Walkways (Commonly Used)

Every ramp and stairway, except for ramps and stairways in areas exempted by (service maintenance areas D3.4 Clause, must comply with—

- for a ramp, except a fire-isolated ramp, Clause 10 of AS 1428.1 ; and
- for a stairway, except a fire-isolated stairway, Clause 11 of AS 1428.1 ; and
- for a fire-isolated stairway, Clause 11.1(f) and (g) of AS 1428.1 ; and
- All stairs and ramps are to be 900mm offset from the allotment boundary in accordance with AS1428.1.
- All stairs and ramps are to allow suitable space for handrail extensions to be provided during a later stage. (No protrusion will be allowed at detail design stage).
- All stairs and ramps adjacent to doors are to ensure 1450mm front approach level landings.
- All walkways, ramps and stairways are to ensure a minimum 1200mm overall width and 1-metre minimum clear circulation in accordance with AS1428.1.
- Step and kerb ramps are to ensure compliance with AS1428.1.
- Curved ramps and walkways are to ensure 1500mm minimum clear width
- Stairs middle landings are to ensure an off-set tread is provided

- When turning 90-degree or 180-degrees on 1:14 ramp, walkways are to ensure 1450mm x 2070mm landings. When there is a lack of sight a passing bay of 1800mm x 2000mm is required.
- Ramps 1:14 and walkways landings are to be 1200mm (only one direction of travel)
- Ramps 1:14 and walkways landings are to be 1500mm x 1500mm (+splay) when turning 90-degrees
- A series of connected ramps must not have a combined vertical rise of more than 3.6m
- A landing for a step ramp must not overlap a landing for another step ramp or ramp

#### Compliance Comments

Provided documentation has been reviewed.

-Ensure suitable space is allowed for handrail extensions to comply with AS1428.1 to be incorporated at a later stage.

**The requirements noted above appear capable of being achieved.**

#### 4.6 Passenger Lift – BCA Part E3.6 & AS1735.12

New lifts required to be accessible must comply with BCA D3.6, D3 and relevant parts of AS1735.12.

- Passenger lifts which travel less than 12m requires floor size of 1100mm by 1400mm. Passenger lifts which travels 12m or above requires floor size of 1400mm by 1600mm.
- Lift lobbies are to ensure 2000mm x 1800mm minimum clear circulation space (to achieve passing bay that allows two users to pass each other, E.q Wheelchairs, prams, large goods, etc.

#### Compliance Comments

Provided documentation has been reviewed.

**The requirements noted above appear capable of being achieved.**

#### 4.7 Sanitary and other Facilities - BCA Part F2

##### Unisex Accessible Toilets (USAT) and Ambulant Facilities

- Class 9b: Provide at least 1 unisex accessible toilet, adjacent to every bank of toilets on each storey, compliant with AS1428.1 under NCC BCA and DDA Premises Standards Part F4. If there is more than 1 toilet bank of toilets on each level, an accessible toilet is required at 50% min. of toilet banks on each level.
- An accessible unisex sanitary compartment must contain a closet pan washbasin, shelf or bench top and adequate disposal of sanitary towels.

- A minimum size of a combined unisex accessible toilet (USAT) and shower facility room is to be 2300mm X 2630mm, to accommodate circulation to the pan (1900mm x 2300mm) and the shower facility.
- Circulation spaces, fixtures and fittings of all accessible sanitary facilities must comply with AS1428.1
- Door circulation is to ensure compliance with AS1428.1 Fig.31 or 32 or door is to be automated.
- An accessible unisex facility must be located so that it can be entered without crossing an area reserved for one gender.
- Left-hand (LH) and right-handed (RH) mirror image facilities to be even where two or more accessible unisex facilities provided. Balance is to be provided between consecutive floor with the same user.
- Where male and female facilities are separate, a unisex facility is only required at one location.
- Accessible unisex sanitary compartment or shower need not be provided on a storey that is not required to be provided with a lift or ramp access
- The distance between successive doorways in a vestibule serving an area required to be accessible is to be 1450mm (excluding door swing)
- Accessible facilities must meet the requirements of Section 15 of AS1428.1
- At each bank of toilets where there is one or more toilets, in addition to an accessible unisex sanitary compartment provided at that bank, a sanitary compartment suitable for a person with an ambulant disability must also be provided for use by males and females.
- The ambulant facilities must comply with the requirements of Clause 16 of AS1428.1:2009. This includes 900mm x 900mm clear circulation spaces in front of the pan, outside of the cubicle and at the entry door (this is to exclude the door swing)

#### Compliance Comments

1. The Ground floor incorporates a specialized changing places facility compartment designed to accommodate users with high support needs and their caregivers. This feature is implemented to ensure compliance with the 2020 specification.

It's crucial to understand that a changing places facility serves a distinct purpose and does not replace a unisex accessible WC.

This compartment is tailored to address different disability requirements, specifically focusing on high support needs and their caregivers. Therefore, this facility should be considered as an additional feature alongside the unisex accessible WC. However, if space limitations and scope size make it impractical to include both, MBC will explore alternative solutions to facilitate ground floor accessibility, with the details to be outlined in the subsequent stage of detailed design. It is noted that L1 will provide a full compliant Unisex accessible toilet to be available when/if required.

#### Compliance Comments

Note: MBC is unable to formally register this facility, but the team can provide valuable assistance in reviewing drawings based on the changing places specification of 2020.

2. Unisex accessible toilet lack of suitable shower circulation space as proposed basin is encroaching into the shower circulation space. Basin is to be relocated to meet compliance. Ensure 2350mm L clear circulation space provision. There is enough space to achieved compliance at a later stage.

**The requirements noted above appear capable of being achieved.**

#### 4.8 Communal and Exempted Areas (D3.4)

Under the DDA Premises Standards and BCA all common use rooms normally used by occupants of the building are to be accessible, except areas exempt under D3.4 - Services /maintenance only use areas, which are areas where access would be inappropriate because of the particular purpose for which the area is used or that would pose a health or safety risk for people with a disability.

- Accessibility is required to common use terraces, open/outdoor spaces within buildings.

#### Compliance Comments

Ensure all commonly use areas are accessible by wheelchair. This includes to upgraded play area, yard, etc.

**The requirements noted above appear capable of being achieved.**

## 5. Conclusion

This report has assessed the Development Application (DA) documentation provided for the 9 Byrnes Street, Broadwater NSW – Broadwater Public School.

The primary purpose of the report is to assess the proposed/new development works against the Access Regulations. It has been identified that access requirement can be achieved in accordance with relevant Access Regulations and Access Code.





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