

Design Review Report - Accessibility

Austral Public School Upgrade

205 Edmondson Avenue, Austral NSW

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1 Executive Summary

The following access report is a review of the supplied documentation for the proposed activity and provides a summary of the access strategy of the proposed works highlighting the key principles of accessibility as well as the technical requirements of a building to ensure the students, staff, and visitors have equitable and dignified use.

1.1 Preamble

This Access Report has been prepared to support a Review of Environmental Factors (REF) for the Department of Education (DoE) for the upgrade of Austral Public School (APS) (the activity). The purpose of the REF is to assess the potential environmental impacts of the activity prescribed by State Environmental Planning Policy (Transport and Infrastructure) 2021 (T&I SEPP) as “development permitted without consent” on land carried out by or on behalf of a public authority under Part 5 of the Environmental Planning and Assessment Act 1979 (EP&A Act). The activity is to be undertaken pursuant to Chapter 3, Part 3.4, Section 3.37 of the T&I SEPP.

The proposed activity is for the upgrades to the existing APS at 205 Edmondson Avenue, Austral, NSW, 2179 (the site).

The purpose of this report is to review the design of the new works against the mandatory accessibility requirements of the Federal Disability (Access to Premises – Buildings) Standards 2010, Building Code of Australia, and design standards adopted by reference.

1.2 Site Description

APS is located at 205 Edmondson Avenue, Austral on the south-eastern corner of the intersection between Edmondson Avenue and Tenth Avenue. The site has an area of 2.986 ha and comprises of 6 allotments, legally described as:

- Lot 1 DP 398105
- Lot 1 DP 398106
- Lot 1 DP 509613
- Lot 1 DP 512119
- Lot 2 DP 509613
- Lot 865 DP2475

The site currently comprises an existing co-educational primary (K-6) public school with:

- 8 permanent buildings;
- 14 demountable structures;
- interconnected paths;
- covered walkways;
- play areas: and
- at-grade parking.

The Austral Community Pre-school is also located within the site.

The existing buildings are clustered in the northern part of the site, ranging between 1 to 2 storeys in height. There is a sports oval in the south-eastern portion of the site, and a densely vegetated informal play area located in the south-western portion of the site.

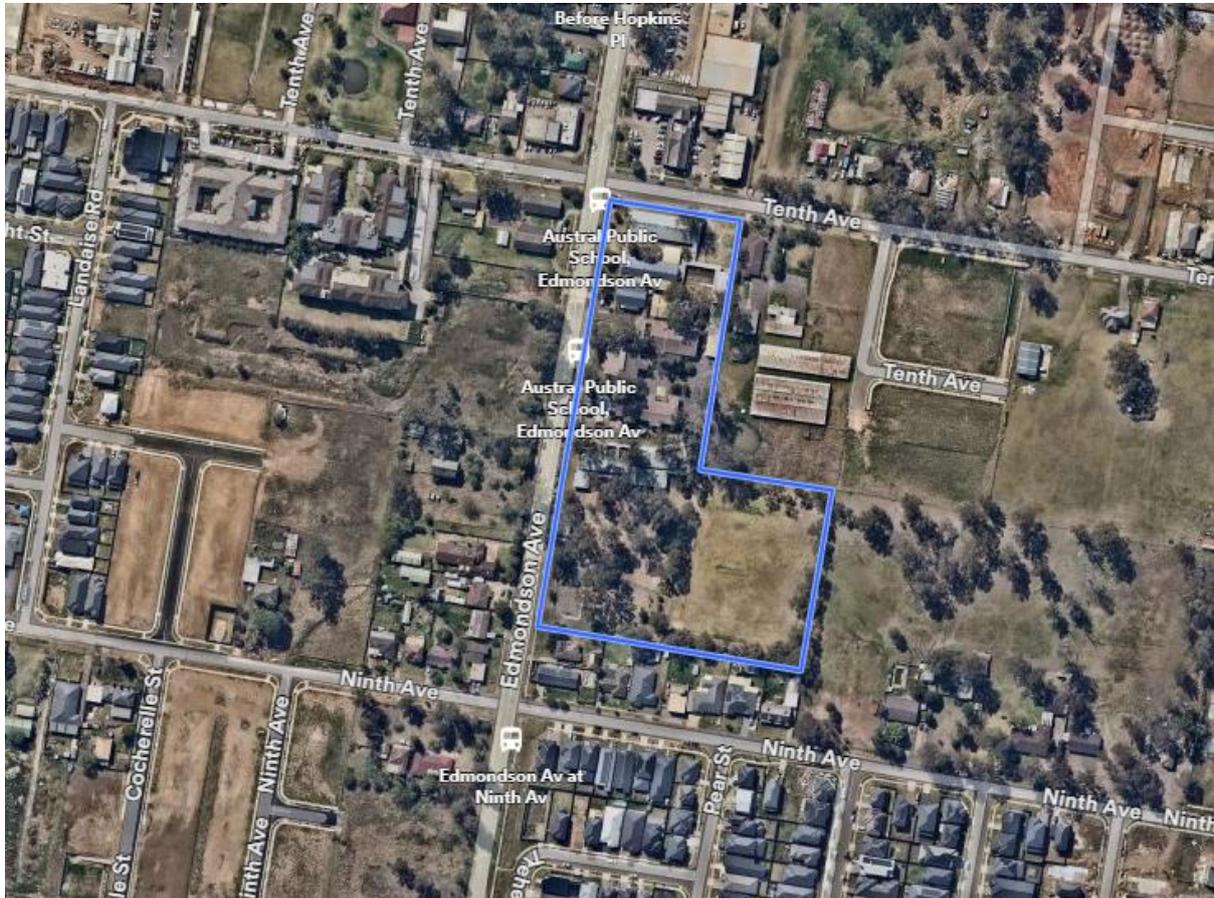


Figure 1: Aerial image of site (source: NearMap, taken 7 Sept 2023)

1.3 Proposed Activity Description

The proposed activity involves alterations and additions to the existing APS, including the following:

- Demolition of existing structures and removal of trees, as well as other site preparation works;
- The erection of a new 3-storey building comprising teaching spaces that includes 20 permanent teaching spaces and 3 support teaching spaces;
- Refurbishment and change of school function of Building I from classrooms to a Library;
- At-grade parking (57 new spaces, including 1 accessible space);
- New driveway and access gate from Edmondson Road;
- Erection of a substation within the site on the northern boundary;
- Upgrade of the sports field;
- Internal pathways, fencing, utility upgrades and associated works; and
- Off-site public domain improvements including retention and upgrading of the Kiss & Drop area and a temporary pedestrian road crossing on Tenth Avenue.

The intent of the activity is to allow for upgrades to APS that will provide a CORE 35 primary school compliant with the EFSG. The works will increase the capacity of the school from 681 students and 40 FTE teachers to 734 students and 64 FTE teachers, respectively. Furthermore, provision within the expanded 734 student capacity will be made for the creation of 30 support class students places.

Figure 2 below shows the scope of works for the proposed activity.

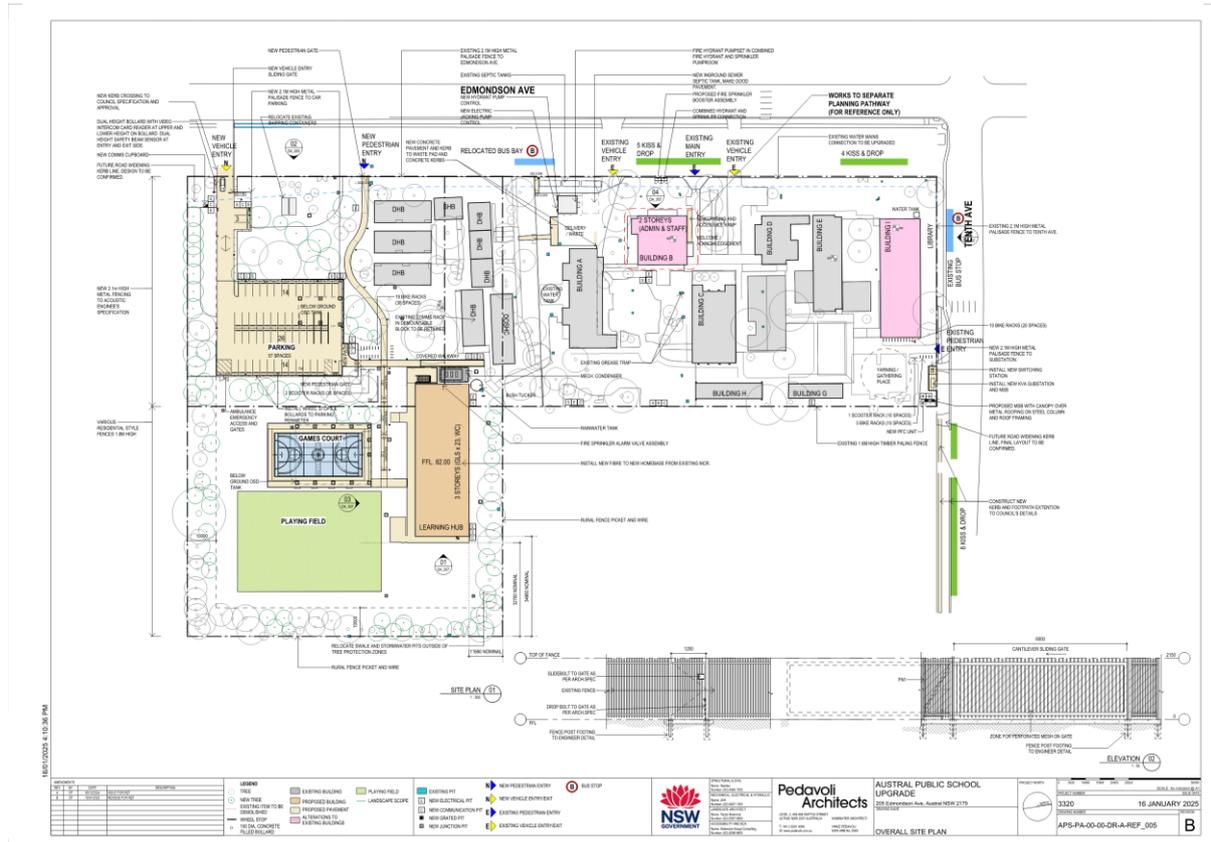


Figure 2: Proposed Site Plan (Source: Pedavoli Architects, Overall Site Plan (Rev B))

1.4 Cumulative Impact Assessment

This activity is required to meet all relevant design compliance requirements for access for people with a disability. In meeting those requirements, various civil works will be required to achieve, *inter alia*, accessible paths of travel as well as suitable vehicular access for people with a disability as required by the relevant design standards.

It is expected that, in and of itself, the achievement of accessibility compliance for this activity will not incur significant impacts over and above those that would otherwise be incurred during the civil and other construction works for the project.

It is further expected that, in and of itself, the achievement of accessibility compliance for the activity will not incur significant impacts post-construction than would otherwise be the case for works of this scale and typology with respect to access, amenity, or safety hazards in the Austral local area.

1.5 Premises Standards / BCA Minimum Provisions Compliance

As members of the Access Consultants Association (ACA), we have reviewed the supplied documentation, as listed in Appendix A to this report, for the proposed activity for compliance with current building accessibility regulations, including:

- Building Code of Australia 2019 Amendment 1 and referenced Australian Standards; and
- The Federal Disability (Access to Premises – Buildings) Standards 2010.

This report has been prepared to provide a summary of the Accessibility requirements applicable to the project and strategies adopted. This report will assist the future developed design to progress through design phases. Further assessment of the design will be required as the design develops to ensure compliance is achieved in line with the access provisions.

1.6 Federal Disability Discrimination Act (DDA) 1992

The Federal Disability Discrimination Act 1992 (DDA) sets out guiding principles to eliminate, as far as reasonable, discrimination based on a disability. It does not contain prescriptive provisions, but includes principles and objectives. As such, a review against this legislation is not definitive. As members of the ACA, we can provide recommendations and advice as to how the project can increase its ability to meet the objectives set out in the legislation. We have accordingly reviewed the project against the objectives of the DDA and have included recommendations to increase the level of compliance achieved by the project.

1.7 Assessment Summary

Subject to addressing the actions identified, McKenzie Group Consulting confirm that the project documentation provides appropriate accessibility capable of meeting the minimum technical provisions of the BCA and the Federal Disability (Access to Premises – Buildings) Standards 2010.

The project, subject to incorporating the actions included in the report is considered to address the objectives of the DDA, within the project scope.

1.8 Summary of key access mitigating measures identified:

The table below provides a summary of the high-priority access mitigating measures identified:

No	Issue / Comment
1.	Building I – not less than one of the existing main entrance doorways is required to comply in full with AS1428.1.

1.9 Advisory / Best Practice Recommendations

A number of recommendations for design enhancement are provided for areas in which potential compliance risks have been identified with respect to meeting the objectives of the DDA and/or where improved outcomes with respect to accessibility, functionality and safety have been identified. These items are considered best practice and it is recommended that they are considered by the Design Team to alleviate the potential risk of complaint against the client / building owner and to ensure general inclusivity and equality is achieved by the proposed design.

1.10 Performance Solution Assessment

No accessibility Performance Solutions for compliance with the BCA have been proposed or identified with respect to the supplied documentation for the proposed activity.

2 Background

2.1 Purpose of Report

This access report provides a compliance overview of the project with respect to meeting the minimum technical provisions of the Building Code of Australia (BCA) and the Federal Disability (Access to Premises – Buildings) Standards 2010.

The assessment also considers the objectives of the Disability Discrimination Act 1992 (DDA), within the project scope. Further assessment of the design documentation will be undertaken as the design develops.

The assessment is provided in two parts. The first relates to areas minimum compliance with the **Premises Standards and BCA**. The second relates to **Advisory / Best Practice Mitigation Measures** that could be adopted to improve building functionality, accessibility, safety of occupants and consideration to the objectives of the DDA.

2.2 Report Objective

A key objective of the access requirements of the Premises Standards and BCA is to provide, as far as is reasonable, all people with safe, equitable and dignified access to a building and the services and facilities within that building.

A key objective of this report is to provide assessment commentary to assist the design process to provide equitable access to the degree necessary to facilities to suit occupants and visitors with a range of disabilities in an equitable and dignified manner.

2.3 Documentation Reviewed

This access report has been prepared with reference to the supplied documentation listed in **Appendix A**. Marked up drawings are attached in **Appendix B**.

3 Legislative Requirements

3.1 General

The legislative requirements for this project comprise both Federal and State legislation.

Federal

The Disability Discrimination Act 1992 (DDA) is Federal legislation that seeks to ensure all new building infrastructure, refurbishments, services and transport projects provide functional and equitable accessibility. The DDA is complaints-based legislation, which is administered by the Australian Human Rights Commission (AHRC). For any built environment the key requirement of the DDA is to ensure functionality, equality and dignity of people with disabilities, and their companions, family, and care givers.

The DDA utilises statutory instruments known as Disability Standards to provide detailed requirements. The Disability Standards are: the Disability (Access to Premises – Buildings) Standards 2010, the Disability Standards for Education 2005, and the Disability Standards for Accessible Public Transport 2002. These Disability Standards draw extensively on technical provisions in the AS 1428 series, which details technical requirements related to design for access and mobility.

State

The Building Code of Australia adopted key accessibility and DDA legislation into the 2011 edition of the BCA, and has been included in all subsequent versions. In particular adherence to the Premises Standards; AS1428.1 2009; AS1428.4.1 2009 and AS2890.6 2009 has become mandatory. This means that compliance with the relevant sections of the BCA, ensures compliance with the relevant 'Premises' component of the DDA.

However, compliance with the BCA alone does not necessarily mean compliance with the Disability Discrimination Act if the elements of equality, dignity and functionality remain compromised within an environment. The building owner/occupier should therefore ensure that their policies, practices and procedures promote equality in all employment, education and services provided, within their built environment.

3.2 The Affected Part and Existing Buildings

Under the Disability (Access to Premises – Buildings) Standards 2010, the 'affected part' of an existing building is defined as:

- the principal pedestrian entrance of the building; and
- the accessible path of travel from the principal pedestrian entrance to the new part of that building.¹

The Premises Standards 2010 require the affected part of a building to be upgraded to be accessible in accordance with AS1428.1.² Where applicable, this may include existing passenger lifts.

3.3 Referenced Legislation and Standards

The review of the project has been undertaken against the following legislation and standards:

¹ Premises Standards 2010 section 2.2(5).

² Ibid at section 2.1(1)(b).

- Federal Disability (Access to Premises – Buildings) Standards 2010.
- Building Code of Australia (BCA) 2022 and referenced standards, including:
 - AS1428.1:2009 General Requirements for access – new building work.
 - AS1428.4.1:2009 Means to assist the orientation of people with vision impairment – TGSi.
 - AS2890.6:2009 Off-street parking for people with disabilities.
 - AS1735.12:1999 Lift facilities for people with disabilities.

Advisory / Best Practice Guidelines & Standards

- Objectives of the Disability Discrimination Act 1992 (DDA).
- AS1428.2:1992 Enhanced and additional requirements – Buildings and facilities.

4 Exemptions and Performance Based Solutions

4.1 Exemptions (Premises Standards / BCA D4D5)

BCA Part D4D5³ allows for spaces within a given building to be exempted from full accessibility so long as those spaces meet certain prescribed criteria.

Those areas would include:

- An area where access would be inappropriate because of the particular purpose for which the area is used.
- An area that would pose a health or safety risk for people with a disability.
- Any path of travel providing access only to an area exempted by the above.

Application to the new works

At the present stage of design, the following areas within the new works would appear to be eligible for an exemption under BCA D4D5:

- Plant including plenums, service routes, equipment rooms for computers or data (including persons with ambulant aids).
- Pathways used to gain access to exempted plant spaces only.
- Cleaner's rooms that are used solely by cleaners.

The areas within the table below will require confirmation from the applicant as to their exact intended use.

Building	Level	Room	Recommendation
N/A	-	-	-

Upon confirmation of the intended use, the above areas may also be eligible for the exemption in BCA Part D4D5.

4.2 Performance Solutions

The BCA is a performance-based code. Compliance with the BCA is achieved via meeting the relevant Performance Requirements of the BCA.⁴ Meeting the Performance Requirements of the BCA is achieved either via meeting the Deemed-to-Satisfy provisions, or via a Performance Solution, or a via a combination of both.⁵

Any access assessments and solutions will be unique to a given building. Assessment and solutions would combine an understanding of the principles of access with alternative methods to assist the design team, building owners, operators, and occupants.

³ Equivalent provisions are contained in Premises Standards, Schedule 1, Part D3.4.

⁴ BCA Part A2G1(1).

⁵ BCA Part A2G2(2).

Developing and Documenting Performance Solutions

From 1 July 2021, there is a prescribed two-step process for the development and documentation of Performance Solutions for compliance with the BCA.

First, an access Performance-Based Design Brief (PBDB) is required to be developed. The PBDB must: identify the relevant compliance matter and BCA provisions; outline the proposed solution and acceptance criteria; and nominate the relevant project stakeholders. The PBDB is required to be circulated and reviewed by all relevant project stakeholders.

Secondly, an access Performance Solution report is to be prepared with respect to the compliance matter as identified in the PBDB. The report is required to analyse and assess the proposed solution against both the acceptance criteria and the BCA Performance Requirements that were nominated in the PBDB.

Application to proposed activity

The table below sets out the matters for which a Performance Solution may be required for compliance with the BCA.

No.	Description	BCA DTS Provision(s)	BCA Performance Requirement(s)
1	-	-	-
2	-	-	-

5 Assessment

The following assessment of each component of the building has been conducted under the following two headings.

- **Premises Standards / BCA Minimum Provisions** refers to meeting the minimum mandatory compliance of the BCA and the Disability (Access to Premises – Buildings) Standards 2010.
- **Advisory / Best Practice Mitigating Measures** refers to advisory information aimed at improving the accessibility design outside Premises Standards / BCA parameters. These measures aim to provide a greater level of access for people with disability within the environment. These measures propose to enhance the design, in conjunction with the owner/occupier's policies, practices and procedures increasing access for people with disability and meeting the objectives of the DDA.

The advice is set out as follows:

Accessibility Requirement:	Details the specification required by a specific Act, code or standard
Assessment Commentary:	describes current design, highlights the action to be undertaken to achieve compliance, outlines the additional detail/documentation required to further assessment
Assessment	Identifies the current status of the design documentation as either:
To be resolved	Item requires modification to meet benchmark/Standard
Note for future design	Drawings to be developed for further assessment
Note for Construction	If built as detailed, is capable of meeting benchmark/standard
Further information required	Insufficient information available to complete review
Performance Based Solution Assessment	Identified departure not meeting DtS of the BCA
Not applicable item	Is not applicable within current design
Note for Consideration	Additional information relevant to function of space for people with disability

5.1 General Building Access Requirements (Premises Standards / BCA)

Under the Premises Standards⁶ and the BCA⁷, access is required to and within the new works as per the following:

Accessibility Requirement	Assessment Commentary
Premises Standards /BCA Minimum Provisions	
Class 9b – School <ul style="list-style-type: none"> To and within all areas normally used by the occupants 	The principal pedestrian entrance to existing Building I will be detailed by the project contractor to be accessible. Access to the new Learning Hub is achievable.
-	-

The contractor is to ensure that the details of the construction documentation will meet the relevant requirements of the Premises Standards and BCA.

5.2 External approaches, walkways and kerbs (Premises Standards / BCA D424, D4D3, D4D4, D4D9, & AS1428.1)

Requirements

The Premises Standards 2010 and BCA require the provision of access as follows:

- From the allotment boundary to the building
- From access parking spaces to the building
- From another accessible building connected by a pedestrian link.
- To and within all areas used by the occupants.

⁶ Premises Standards, Schedule 1, Table D3.1.

⁷ BCA D4D2.

Assessment

Pedestrian accessways are currently detailed in the following locations:

- From the new main entrance gate on Edmondson Avenue into the existing campus.
- From the new on-grade car park at the southern end of the existing campus into the existing campus.
- To the new Learning Hub building.

All of the above accessways will require compliance with the Premises Standards 2010 and the BCA. This is achievable. The project contractor is to ensure that the details of the construction documentation will meet the relevant requirements of the Premises Standards and BCA.

5.3 Accessible Car Parking (Premises Standards / BCA D4D6, AS1428.1, AS2890.6)

Requirements

For car parking for a Class 9b building, a minimum of 1 per cent of all car parking is to be accessible in accordance with AS2890.6:2009.

Accessible car parking spaces are required to be designed to comply with AS 2890.6:2009. A shared area of minimum 5400mm x 2400mm, protected with a bollard, is required adjacent to accessible car parking spaces.

Assessment

The scope of the proposed activity does not include either new car parking or modification to the as-built provisions of car parking. As such, there would be no obligation for provisions for accessible parking within the scope of the proposed activity.

5.4 New Entrances/Doors (Premises Standards / BCA D4D2, D4D3, D3D13, & AS1428.1)

Requirements

The principal pedestrian entrance of a building is required to be accessible in accordance with AS1428.1. Not less than 50 per cent of all main entrances in a building are required to be accessible. In buildings over 500m² in floor area, a non-accessible entrance must not be located more than 50m from an accessible entrance.

Where a given pedestrian entrance contains multiple doors, the following is required:

- For an entrance containing not more than 3 doors, at least one of the doorways must be accessible.
- For an entrance containing more than 3 doors, not less than 50% of the doorways must be accessible.

A door is considered to be accessible if it is automatic (open and closing) or is more than 850mm in clear opening width and contains the required door circulation space as per AS1428.1.

Assessment

The table below sets out the buildings that will contain new works, their principal pedestrian entrances, and remarks with respect to access compliance.

Building	Existing / New Building	Main Entrance	Access Compliance Remarks	Recommendation
Learning Hub	New	Ground Level – entrances via Learning Commons	N/A	N/A
		Level 1 – entrances via Learning Commons	N/A	N/A
		Level 2 – entrances via Learning Commons	N/A	N/A

The scope of the proposed activity will also include multiple new internal doorways. MGC has reviewed the documentation for the purposes of this submission. Upon review, it is found that the supplied documentation would be capable of achieving reasonable access outcomes for people with a disability in accordance with the above requirements. The project contractor is to ensure that the details of the construction documentation will meet the relevant requirements of the Premises Standards and BCA.

5.5 Affected Part (Premises Standards, AS1428.1)

Requirements

The principal pedestrian entrance of an existing building that contains new works is required to be accessible in accordance with AS1428.1:2009.

The path of travel from the principal pedestrian entrance of an existing building to the new part of that building is also required to be accessible in accordance with AS1428.1:2009.

Assessment

The table below sets out the existing buildings that will contain new works and remarks with respect to access compliance.

Building	Existing / New Building	Area	Access Compliance Remarks	Recommendation
Building I – Library	Existing	Ground Level – multiple main entrances	Not less than one of the existing main entrances is to be accessible.	Further assessment will be required.

Modification will be required as noted in the table above. The project contractor is to ensure that the details of the construction documentation will meet the relevant requirements of the Premises Standards and BCA.

5.6 Passenger Lifts (Premises Standards / BCA D4D2, E3D6, E3D8, AS1428.1, & AS1735.12)

Requirements

Passenger lifts are required to meet BCA E3D7, E3D8, and E3D9.⁸

Passenger lift cars require the following minimum sizes:

⁸ Equivalent provisions are contained in Premises Standards 2010, Schedule 1, Parts E3.6 and E3.7.

- For 12m of travel or more: 1400(W) x 1600mm (L)
- For less than 12m of travel: 1100mm (W) x 1400mm (L).

Passenger lifts require accessible features in accordance with AS1735.12.

Assessment

The scope of the new works will include the provision of one new passenger lift within the Learning Hub building. The new passenger lift will provide a continuous accessible path of travel between all levels of that building – namely, Ground Level through Level 2. The project contractor is to ensure that the details of the construction documentation will meet the relevant requirements of the Premises Standards and BCA.

5.7 Stairways (Premises Standards / BCA D4D2, D4D3, D4D4, D4D9 & AS1428.1)

Requirements

Stairways shall be constructed as follows:

- a) Where the intersection is at the property boundary, the stair shall be set back by a minimum of 900mm so that the handrail and TGSIs do not protrude into the transverse path of travel.
- b) Where the intersection is at an internal corridor, the stair shall be set back one tread width plus 300mm (nominally 700mm as per AS 1428.1-2009 Fig 26(b)), so the handrails do not protrude into transverse path of travel.
- c) Stairs shall have opaque risers.
- d) Stair nosing shall not project beyond the face of the riser and the riser may be vertical or have a splay backwards up to a maximum 25mm.
- e) Stair nosing profiles shall;
 - Have a sharp intersection;
 - Be rounded up to 5mm radius; or
 - Be chamfered up to 5mm x 5mm

- f) All stairs, including fire isolated stairs shall, at the nosing of each tread have a strip not less than 50mm and not more than 75mm deep across the full width of the path of travel. The strip may be set back a maximum of 15mm from the front of the nosing. The strip shall have a minimum luminance contrast of 30% to the background. Where the luminous contrasting strip is affixed to the surface of the tread, any change in level shall not exceed a difference of 5mm.

Assessment

The table below sets out the new and upgraded stairways that are within the scope of works, and remarks with respect to access compliance.

Building / Area	Stairway	Existing / New Stairway	Access Compliance Remarks
General circulation stairways			
Learning Hub	General circulation – west	New	Capable of compliance
	General circulation – east	New	Capable of compliance
Fire-isolated stairways			
Nil.	-	-	-

MGC has reviewed the documentation for the purposes of this submission. Upon review, it is found that the supplied documentation would be capable of achieving reasonable access outcomes for people with a disability in accordance with the above requirements. The project contractor is to ensure that the details of the construction documentation will meet the relevant requirements of the Premises Standards and BCA.

5.8 Ramps and Graded Walkways (Premises Standards / BCA D4D2, D4D3, D4D4, D4D9, D4D12, & AS1428.1)

Requirements

On an accessway a series of connected ramps must not have a combined vertical rise of more than 3.6m and a landing for a step ramp must not overlap a landing for another step ramp or ramp.

All general circulation ramps are to be designed to comply with AS1428.1 – that is., clear width not less than 1m, handrails both sides, TGSIs, compliant landing sizes, gradient and kerbrails.

Assessment

MGC has reviewed the documentation for the purposes of this submission. Upon review, it is found that the supplied documentation would be capable of achieving reasonable access outcomes for people with a disability in accordance with the above requirements. The project contractor is to ensure that the details of the construction documentation will meet the relevant requirements of the Premises Standards and BCA.

5.9 TGSIs and Hazard Identification (Premises Standards / BCA D4D9, D4D13, AS1428.1 & AS1428.4.1)

Requirements

Tactile indicators are required to be provided to warn occupants of all stairs (except fire-isolated stairways) and ramps regardless of public nature or private environment and where an overhead obstruction occurs less than 2.0m above the finished floor level.

Any glazing capable of being mistaken for a doorway or opening must be clearly marked (or contain chair rail, handrail or transom as per AS 1288 requirements)

Assessment

MGC has reviewed the documentation for the purposes of this submission. Upon review, it is found that the supplied documentation would be capable of achieving reasonable access outcomes for people with a disability in accordance with the above requirements. The project contractor is to ensure that the details of the construction documentation will meet the relevant requirements of the Premises Standards and BCA.

5.10 Internal Walkways/Circulation (Premises Standards / BCA D4D2, D4D3, D4D4 & AS1428.1)

Requirements

Accessways must have 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. They should also have turning spaces complying with AS 1428.1 within 2m of the end of accessways where it is not possible to continue travelling along the accessway and at maximum 20m intervals along the accessway.

An intersection of accessways satisfies the spatial requirements for a passing and turning space and a passing space may serve as a turning space.

Assessment

MGC has reviewed the documentation for the purposes of this submission. Upon review, it is found that the supplied documentation would be capable of achieving reasonable access outcomes for people with a disability in accordance with the above requirements. The project contractor is to ensure that the details of the construction documentation will meet the relevant requirements of the Premises Standards and BCA.

5.11 Accessible Sanitary Facilities (Premises Standards / BCA D4D2, D4D3, F4D5, F4D6 & AS1428.1)

Requirements

A unisex accessible toilet is required on each level of a building that has sanitary facilities. 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.

A unisex accessible sanitary compartment or an accessible unisex shower need not be provided on a storey or level that is not provided with a passenger lift or ramp complying with AS1428.1.

A unisex accessible sanitary facility must be located so that it can be entered without crossing an area reserved for one sex only and provided in accordance with AS 1428.1-2009 and must contain a closet pan, washbasin, shelf or bench top and adequate means of disposal of sanitary products.

The division between left-hand and right-hand transfer accessible pans is to be as even as possible.

Assessment:

The scope of the new work will include the provision of new unisex accessible toilets as per the table below.

Building	Level	Area	New / Existing Facility	Left-Hand (LH) or Right-Hand (RH) Transfer Pan
Learning Hub	Ground Level	General Learning Space	New	LH
	Ground Level	Learning Commons	New	RH
	Ground Level	East toilet bank	New	LH
	Level 1	East toilet bank	New	RH
	Level 2	East toilet bank	New	LH

The provision of the above quantities of accessible toilets would be suitable for compliance with the Premises Standards and the BCA. All of the accessible toilets are in locations that are accessible for compliance with the Premises Standards 2010 and the BCA. The division between left-hand and right-hand transfer pans across the accessible toilets is as even as possible for compliance with the Premises Standards and the BCA. The project contractor is to ensure that the details of the construction documentation with respect to accessible sanitary facilities will meet the relevant requirements of the Premises Standards and BCA.

5.12 Ambulant Sanitary Facilities (Premises Standards / BCA D4D2, D4D3, F4D5, F4D6 & AS1428.1)

Requirements

At each bank of toilets where there is one or more toilets in addition to an accessible unisex sanitary compartment, 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.

Assessment:

The scope of the new work will include the provision of new ambulant cubicles as per the table below.

Building	Level	Area	New / Existing Facility	Gender
Learning Hub	Ground Level	East toilet bank	New	One male; one female
	Level 1	East toilet bank	New	One male; one female
	Level 2	East toilet bank	New	One male; one female
Building I	Ground Level	West	New	Unisex

The provision of the above ambulant cubicles respectively within the new Learning Hub building and Building I will meet the minimum quantity of ambulant cubicles for that building for compliance with the DTS provisions of the Premises Standards 2010 and the BCA. The clearances at the ambulant cubicles within the Learning Hub will be capable of meeting AS1428.1. The project contractor is to ensure that the details of the construction documentation with respect to ambulant sanitary facilities will meet the relevant requirements of the Premises Standards and BCA.

5.13 Switches & GPOs (Premises Standards / BCA D4D2 & AS1428.1)

Requirements

All switches and GPOs are to comply with AS1428.1:

- All switches and controls to be located between 900-1100mm AFFL and
- >500mm from an internal corner as per Fig 37 of AS 1428.1-2009

Assessment

MGC has reviewed the documentation for the purposes of this submission. Upon review, it is found that the supplied documentation would be capable of achieving reasonable access outcomes for people with a disability in accordance with the above requirements. Further detailed design review will be required during design development stage to ensure that appropriate access outcomes are achieved. The project contractor is to ensure that the details of the construction documentation will meet the relevant requirements of the Premises Standards and BCA.

5.14 Signage (Premises Standards / BCA D4D7, Specification 15, & AS1428.1)

Requirements

As part of the detailed design package, specifications will need to be developed for the following:

- Sanitary facility identification signs
- Directional / way-finding signs to the main entrances, sanitary facilities
- Hearing augmentation systems
- Each door required by BCA E4D5 (previously E4.5) to be identified with an exit sign stating 'Exit' followed by 'Level' and the level number.

Signage is to meet BCA Specification 15,⁹ including with respect to the use of Braille and tactile text and pictograms, and with respect to location. Braille and tactile signs must be illuminated to ensure luminance contrast requirements are met at all times during which the sign is required to be read.

Assessment

MGC has reviewed the documentation for the purposes of this submission. Upon review, it is found that the supplied documentation would be capable of achieving reasonable access outcomes for people with a disability in accordance with the above requirements. Further detailed design review will be required during design development stage to ensure that appropriate access outcomes are achieved. The project contractor is to ensure that the details of the construction documentation will meet the relevant requirements of the Premises Standards and BCA.

5.15 Hearing Augmentation (Premises Standards / BCA D4D8)

Requirements

A system of hearing augmentation is required within a 9b building, auditorium conference room, meeting room etc. that contains a PA system not used for emergency purpose or any ticket office or teller's booth or reception where the public is screened from the service provider.

⁹ Equivalent provisions are contained within Premises Standards 2010, Schedule 1, Part D4.

Assessment

The following spaces within the subject works appear to have in-built system of audio amplification:

- Learning Hub building:
 - all General Learning Spaces
 - all Learning Commons.
- Building I – all Programs rooms

If so, a system of hearing augmentation may be required within each of the above spaces. The project contractor is to ensure that the details of the construction documentation will meet the relevant requirements of the Premises Standards and BCA.

5.16 Accessible Adult Change Facilities (Premises Standards / BCA F4D12, Specification 27)

Requirements

Accessible adult change facilities are required where:

- a class 6 building that is a shopping centre having a design occupancy of not less than 3,500 persons allowed and contains a minimum of 2 SOUs; or
- Class 9b sporting venue with a design occupancy of not less than 35,000 spectators or contains a swimming pool with a perimeter not less than 70m
- Museum, art gallery, theatre with a design occupancy of not less than 1,500 patrons
- A domestic or international airport terminal.

General requirements for an accessible adult change facility include:

- All required equipment and fixtures to be contained within the same room
- It must be located so that it can be entered without crossing an area reserved for one sex only.
- Room height of 2.4m minimum
- Circulation spaces

- Specified fixtures and fittings, including: a ceiling-mounted hoist, pan, backrest, grabrails, washbasin, change table, change rails
- Automated entrance door
- Signage

Assessment

The building classification of the new works will be Class 9b – school. New works of Class 9b building classification would not require the provision of an accessible adult change facility for compliance with the DTS provisions of the BCA.

That being said, the scope of the new works will include the provision of one new accessible adult change facility on Ground Level of the Learning Hub building. It would be recommended for this new facility to be designed to meet the DTS provisions of the BCA. This would be on the grounds that if such a facility is to be provided in a given instance, its design and features should provide a consistent degree of amenity so as to meet the needs of users of this type of facility.

Upon review, it is noted that the room of the proposed facility will have dimensions to accommodate the minimum combined circulation areas and fixtures and fittings for compliance with BCA F4D12. The facility will be detailed during design development to achieve full compliance with BCA F4D12.

6 Conclusion

6.1 Evaluation of Environmental Impacts

As members of the Access Consultants Association (ACA), we have reviewed the supplied design documentation as listed in **Appendix A** against current building accessibility compliance provisions, including the following:

- The Building Code of Australia 2022 (BCA) and referenced Australian Standards; and
- The Federal Disability (Access to Premises – Buildings) Standards 2010 (Premises Standards).

The achievement of accessibility code compliance is a minimum legislative requirement that can and must be met. The achievement of this requirement for the activity will not, in and of itself, have a significant effect on the environment.

6.2 Mitigation Measures

Contained within this report is a high-level summary of the accessibility requirements applicable to the project and strategies adopted. The table below provides a snapshot of required mitigation measures:

Mitigation Name/Number	Aspect/Section	Mitigation Measure	Reason for Mitigation Measure
External approaches	5.2	Contractor to ensure details meet Premises Standards/BCA prior to handover.	<ol style="list-style-type: none"> 1. Compliance with legislation. 2. Delivery of equitable access for the building occupants in accordance with code. 3. Minimisation of abortive and/or rectification works on site.
Entrances and doorways	5.4		
Passenger lifts	5.6		
Paths of travel	5.7, 5.8, 5.9, and 5.10		
Sanitary facilities	5.11, 5.12		
Switches and GPOs	5.13		
Signage	5.14		
Hearing augmentation	5.15		
Affected Part – Building I	5.5	<p>Not less than one of the existing main entrances of Building I is to be accessible.</p> <p>Contractor to ensure details meet Premises Standards/BCA prior to handover</p>	

Mitigation Name/Number	Aspect/Section	Mitigation Measure	Reason for Mitigation Measure
Accessible adult change facility	5.16	Notwithstanding that, under the Premises Standards and the BCA, this facility is not a required facility for this building, the project contractor is to ensure the detail of the facility is accordance with the Premises Standards and BCA prior to handover.	
External Play Areas	5.17	Contractor to give due consideration to detailing the external play areas to enable equitable access for students, staff, and visitors.	

Subject to addressing the actions identified herein, McKenzie Group Consulting confirms that the project documentation provides appropriate accessibility that meets the minimum technical provisions of the Premises Standards and the BCA.

This report will be updated as the project progresses, and more detailed design information becomes available. Updates will occur at agreed project milestones as agreed in our project agreement.

If you have any further queries in relation to the access report please contact Eden Fong on (02) 8298 6800.

Assessed by:	Reviewed by:
 Eden Fong Associate Accredited Member – ACA Membership No 335 McKenzie Group Consulting (NSW) Pty Ltd ACN 093 211 995	 Angela Chambers Associate Accredited Member – ACA Membership No 406 McKenzie Group Consulting (Qld) Pty Ltd ACN 140 159 486

7 Appendix A – Document List

Drawing No.	Title	Rev	Date	Prepared By
APS-PA-00-GF-DR-A-REF_000	Cover Sheet and Drawing List	B	16/01/2025	Pedavoli Architects
APS-PA-00-00-DR-A-REF_001	Site Analysis Plan	B	16/01/2025	Pedavoli Architects
APS-PA-00-00-DR-A-REF_003	Site Plan – Existing Conditions	B	16/01/2025	Pedavoli Architects
APS-PA-00-00-DR-A-REF_004	Site Plan – Demolition	B	16/01/2025	Pedavoli Architects
APS-PA-00-00-DR-A-REF_005	Overall Site Plan	B	16/01/2025	Pedavoli Architects
APS-PA-00-00-DR-A-REF_007	Site Sections	B	16/01/2025	Pedavoli Architects
APS-PA-00-GF-DR-A-REF_101	Site Plan – Ground floor Composite Plans – Sheet 01	B	16/01/2025	Pedavoli Architects
APS-PA-00-GF-DR-A-REF_102	Site Plan – Ground floor Composite Plans – Sheet 02	B	16/01/2025	Pedavoli Architects
APS-PA-00-L1-DR-A-REF_103	Site Plan – Level 1 Composite Plans – Sheet 01	B	16/01/2025	Pedavoli Architects
APS-PA-00-L1-DR-A-REF_104	Site Plan – Level 1 Composite Plans – Sheet 02	B	16/01/2025	Pedavoli Architects
APS-PA-00-L2-DR-A-REF_105	Site Plan – Level 2 Composite Plans – Sheet 01	B	16/01/2025	Pedavoli Architects
APS-PA-00-L2-DR-A-REF_106	Site Plan – Level 2 Composite Plans – Sheet 02	B	16/01/2025	Pedavoli Architects
APS-PA-00-L3-DR-A-REF_107	Site Plan – Level 3 Composite Plans – Sheet 01	B	16/01/2025	Pedavoli Architects
APS-PA-00-ZZ-DR-A-REF_111	Elevations – Sheet 01	B	16/01/2025	Pedavoli Architects
APS-PA-00-ZZ-DR-A-REF_112	Elevations – Sheet 02	B	16/01/2025	Pedavoli Architects

Drawing No.	Title	Rev	Date	Prepared By
APS-PA-00-ZZ-DR-A-REF_121	Composite Sections – Sheet 01	B	16/01/2025	Pedavoli Architects
APS-PA-00-ZZ-DR-A-REF_122	Composite Sections – Sheet 02	B	16/01/2025	Pedavoli Architects
APS-PA-00-ZZ-DR-A-REF_304	Site Height Limit Diagram	B	16/01/2025	Pedavoli Architects
APS-PA-00-ZZ-DR-A-REF_305	Height Limit 3D Massing Renders	B	16/01/2025	Pedavoli Architects
APS-PA-00-ZZ-DR-A-REF_401	Renders and Material Board	B	16/01/2025	Pedavoli Architects
2025 01 16 22-050W	Austral Public School – Landscape REF	B	16/01/2025	Taylor Brammer
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8 Appendix B – Drawing Markups

This section has been deliberately kept blank.