

PARRAMATTA EAST PUBLIC SCHOOL UPGRADE

30-32 Brabyn St, North Parramatta NSW 2150

Report Prepared for: NSW Department of Education
Level 8, Level 8, 8 Central Avenue,
Eveleigh, NSW 2015

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DOCUMENT ACCEPTANCE

	Name	Signed	Date
Prepared by	Lucy Alderson <i>Access Consultant</i>		27 February 2025

REVISION HISTORY

Revision No.	Prepared by	Description	Date
00	Lucy Alderson	80% Schematic Phase Report	01 August 2024
01	Lucy Alderson	90% Schematic Phase Report Updated	19 September 2024
02	Lucy Alderson	90% Schematic Phase Report FINAL	25 September 2024
03	Lucy Alderson	100% Schematic Phase Report FINAL	18 October 2024
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05	Lucy Alderson	100% Schematic Phase Report FINAL	05 November 2024
06	Lucy Alderson	Draft REF Report	05 February 2024
07	Lucy Alderson	REF Report FINAL	05 February 2024

This report has been prepared based on the available time allocated to conduct the review, and 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.

The information provided within this report is relevant to this project and the documentation referenced. As such the information provided may not be transferred to other projects. This report must not be issued for public comment or be used for any other purpose without prior permission from Philip Chun Accessibility.

Philip Chun Accessibility 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.



1. INTRODUCTION

This Accessibility report has been prepared by Philip Chun Accessibility on behalf of the NSW Department of Education to assess the potential environmental impacts that could arise from the Parramatta East Public School (PEPS) upgrade (the Proposal) at 30-32 Brabyn Street, North Parramatta (the site). The works are proposed by the NSW Department of Education to meet the growth in educational demand in Collet Park precinct, and the broader North Parramatta area.

This report has been prepared to review the proposed REF design plan documentation against applicable Australian disability standards, codes and legislation.

Access requirements considered in this report are found in a range of legislation, planning instruments and standards pertaining to access for people with a disability. These include but are not limited to:

- the National Construction Code (BCA 2022),
- Disability (Access to Premises – Buildings) Standards 2010 (Premises Standards),
- relevant Australian Standards,
- the Disability Discrimination Act 1992 (*Cth*) (DDA).

This report has been prepared by Philip Chun Accessibility with the aim of also providing reasonable recommendations in regard to access to premises requirements. Philip Chun Accessibility has endeavoured to clearly identify each issue of concern with respect to the building element and with reference to relevant legislation and guidelines.

1.1 Summary of the Activity

The activity comprises upgrades to PEPS to provide replacement teaching facilities in place of the existing temporary and permanent facilities that are no longer fit for purpose, involving the following works:

- Site preparation and required earthworks;
- Demolition of existing Buildings C, D, E and F, and associated structures including adjacent ramps and walkways;
- Construction of the following:
 - A new 3-storey school building (referred to as Block R) including teaching spaces, library/administration, and staff/student amenities;
 - Upgrade of soft and hard landscape and playground areas;
 - A new at-grade parking area;
 - Formalised waste area, with access being retained from Gaggin Street;
 - Public Domain Works with upgrades to the pedestrian access south of the school, and new kiss and ride zone on Albert Street East;
 - Entrance and School logo signage along the Northern Albert Street East frontage of Block R;
- Refurbishment works to existing buildings;
- Removal of trees as required and retention where possible; and
- Installation and augmentation of services and infrastructure as required.

Refer to the Review of Environmental Factors prepared by Ethos Urban for a full description of works.

1.2 Site Description

The site is located at Brabyn Street within the City of Parramatta Local Government Area. Parramatta East Public School is located in the suburb of North Parramatta, within the City of Parramatta Local Government Area (LGA). The site is approximately 1.5km northeast of the Parramatta CBD, and 24km west of the Sydney CBD.

The site currently comprises a single lot to make up Parramatta East Public School, referred to as Lot 100, DP1312418, and the land is owned by the Minister for Education and Early Learning.

The site has an area of approximately 1.782Ha, is of an irregular shape, and is bounded by Brabyn Street to the West, Albert Street East to the North, and Gaggin Street/Webb Street to the East. The



project area is contained within the site and represents where the proposed works will be undertaken, with an area of approximately 1.492Ha.

An aerial image of the site and project area is shown at Figure 1 below.



1.3 Significance of Environmental Impacts

Based on the identification of potential issues, and an assessment of the nature and extent of the impacts of the proposed activity, it is determined that:

- The extent and nature of potential impacts are low and will not have significant impact on the locality, community and/or the environment.
- Potential impacts can be appropriately mitigated or managed to ensure that there is minimal impact on the locality, community and/or the environment.

1.4 Exclusions

Matters that fall outside the scope of this report include, Safety in Design considerations, construction or installation approaches and assessment against Occupational Health and Safety legislation requirements.

In addition, the following aspects of the project are outside the scope of this assessment:

- a) Rooms or areas which are excluded from requiring access for people with disabilities, under the provisions of BCA Part D4D5. These include areas where access would be inappropriate because of the particular purpose for which the area is used and /or due to occupational health and safety reasons (such as maintenance only and service areas).

1.5 Reviewed Documentation

This preliminary advice is based upon the following REF design documentation developed by JDH Architects as follows:



Drawing No/Revision	Drawing Title
PEPS-JDH-XX-XX-DR-A-0000 (A)	COVER PAGE
PEPS-JDH-XX-XX-DR-A-0001 (A)	DRAWINGS SCHEDULE, LEGENDS & SYMBOLS
PEPS-JDH-ZZ-XX-DR-A-0010 (A)	SITE PLAN EXISTING
PEPS-JDH-ZZ-XX-DR-A-0011 (B)	SITE PLAN DEMOLITION
PEPS-JDH-ZZ-XX-DR-A-0012 (B)	SITE PLAN PROPOSED
PEPS-JDH-ZZ-ZZ-DR-A-0013 (A)	EXISTING PLAY SPACE AREA
PEPS-JDH-ZZ-ZZ-DR-A-0014 (A)	PROPOSED PLAY SPACE AREA
PEPS-JDH-ZZ-XX-DR-A-0015 (A)	SITE PLAN ESTABLISHMENT
PEPS-JDH-ZZ-XX-DR-A-0016 (A)	PUBLIC DOMAIN PLAN
PEPS-JDH-ZZ-XX-DR-A-0021 (A)	SITE STAGING PLAN EARLY WORKS
PEPS-JDH-ZZ-XX-DR-A-0022 (A)	SITE STAGING PLAN PROPOSED
PEPS-JDH-ZZ-GF-DR-A-0101 (A)	GENERAL ARRANGEMENT - DEMOLITION GROUND FLOOR PLAN SHEET 1
PEPS-JDH-ZZ-GF-DR-A-0102 (B)	GENERAL ARRANGEMENT - DEMOLITION GROUND FLOOR PLAN SHEET 2
PEPS-JDH-ZZ-GF-DR-A-0103 (A)	GENERAL ARRANGEMENT - GROUND FLOOR PLAN SHEET 1
PEPS-JDH-ZZ-GF-DR-A-0104 (B)	GENERAL ARRANGEMENT - GROUND FLOOR PLAN SHEET 2
PEPS-JDH-ZZ-L1-DR-A-0105 (A)	GENERAL ARRANGEMENT - FIRST FLOOR PLAN
PEPS-JDH-ZZ-L2-DR-A-0106 (A)	GENERAL ARRANGEMENT - SECOND FLOOR PLAN
PEPS-JDH-ZZ-GF-DR-A-0125 (B)	CAR PARK PLAN
PEPS-JDH-B00R-ZZ-DR-A-0501 (A)	ELEVATION SHEET 1
PEPS-JDH-B00R-ZZ-DR-A-0502 (A)	ELEVATION SHEET 2
PEPS-JDH-B00R-ZZ-DR-A-0503 (A)	ELEVATION SHEET 3
PEPS-JDH-B00R-ZZ-DR-A-0504 (A)	ELEVATION SHEET 4
PEPS-JDH-B00R-ZZ-DR-A-0505 (A)	STREETSCAPE ELEVATION SHEET 1
PEPS-JDH-B00R-ZZ-DR-A-0506 (A)	ELEVATION SHEET 5
PEPS-JDH-ZZ-ZZ-DR-A-0507 (A)	ELEVATION SHEET 6
PEPS-JDH-B00R-ZZ-DR-A-0511 (A)	SECTION SHEET 1
PEPS-JDH-B00R-ZZ-DR-A-0512 (A)	SECTION SHEET 2
PEPS-JDH-ZZ-ZZ-DR-A-0513 (A)	SECTION SHEET 3

1.6 Methodology

Philip Chun Accessibility 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.

Accessibility is paramount in providing an inclusive environment for all users. Philip Chun Accessibility looks beyond basic compliance issues to ensure that all users are offered the opportunity to participate in society. We incorporate the principles of Universal Design into all of our work, taking a holistic approach in the provision of access for people with disabilities.

2. LEGISLATION

2.1 National Construction Code / Building Code of Australia

The National Construction Code (NCC) comprises the Building Code of Australia (BCA) and the Plumbing Code of Australia (PCA). NCC is all encompassing and contains Volumes One, Two and Three (The Guide), and, the NCC 2022 Consolidated Performance Requirements.

- **Volume One** contains the requirements for Class 2 to 9 (multi-residential, commercial, industrial and public) buildings and structures (BCA).
- **Volume Two** contains the requirements for Class 1 (residential) and Class 10 (non-habitable) buildings and structures.
- **Volume Three** contains the requirements for plumbing and drainage for all classes of buildings.
- **Livable Housing Design Standard** is the ABCB Standard referenced in the Deemed-to-Satisfy Provisions of Part G7 of NCC Volume One and Part H8 of NCC Volume Two.



- **Housing Provisions Standard** contains Deemed-to-Satisfy Provisions that are considered to be acceptable forms of construction that meet the requirements for complying with Parts H1 to H8 of NCC Volume Two.
- **Consolidated Performance Requirements** provides a compilation of all NCC Performance Requirements and explains important concepts on how the NCC must be interpreted and applied..

The accessibility requirements outlined in this report have been assessed based on the new works having a primary BCA classification of Class 5, and 9b, as advised by the Relevant Building Surveyor / building certifier.

2.2 Part D4 – General Building Access Requirements

Part D4 of the BCA prescribes the minimum requirement for access to a building. Access for people with disabilities is required through the principal pedestrian entrance and throughout the building in accordance with D4D2. Buildings and parts of buildings must be accessible as required by this clause, unless exempted by D4D5.

The following table outlines the general building access requirements for this project:

Class 5, 6, 7b and 9a Buildings

D4D2(6) For Class 5, 6, 7b, 8 and 9a buildings, access must be provided to and within all areas normally used by the occupants.

Class 9b Buildings

D4D2(8) For a Class 9b building, access requirements are as follows:

- (a) Schools and early childhood centres — to and within all areas normally used by the occupants.
- (b) An assembly building, not being a school or early childhood centre—to and within—
 - (i) wheelchair seating spaces provided in accordance with D4D10; and
 - (ii) 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.

Class of building	Access requirements
Class 5 D4D2(6)	To and within all areas normally used by the occupants
Class 9b	To and within all areas normally used by the occupants
D4D2(8)(a) <i>Schools and early childhood centres</i>	To and within all areas normally used by the occupants

2.3 Disability Discrimination Act 1992 (Cth) (DDA)

The Disability Discrimination Act 1992 (DDA) implements Australia’s international human rights obligations under the Convention on the Rights of Persons with Disabilities as well as obligations relating to non-discrimination under other treaties, including the International Covenant on Civil and Political Rights.

The DDA makes it unlawful to discriminate against a person with a disability on the basis of their disability, including the areas of:

- Work
- Accommodation
- The provision of goods and services
- Access to buildings or premises



The DDA has a section that addresses access requirements for '*buildings*', under Section 23, which relates to access to premises and facilities which the public may enter or use. The DDA also contains the mechanism to create specific Disability Standards.

The following Disability Standards have been created under the DDA to provide more detail and certainty in the provision of meeting the DDA in relation to the provision of goods, services and premises:

- Disability Standards for Accessible - Public Transport 2002
- Disability Standards for Education 2005
- Disability (Access to Premises –Buildings) Standards 2010

The DDA 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.

2.4 Access to Premises Standards – General

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 complaints provisions of the DDA.

2.5 Access to Premises Standards – New Work

Where new work that requires building or construction approval is undertaken on an existing building, such as an extension or refurbishment, there is a requirement to ensure the new or modified part of the building complies with the Premises Standards.

2.6 Access to Premises Standards – Affected Part

In addition to the new work requirement, there is a requirement to provide an accessible path of travel from the principal public entrance, to the new or modified part of an existing building. This is referred to as the 'affected part' of a building (Subsection 2.1(5) of the Premises Standards).

Areas outside of the new work and the affected part work do not have any access requirements imposed by the Premises Standards but these areas will continue to be subject to the general complaints framework of the DDA.

3. BUILDING CODE OF AUSTRALIA - ACCESSIBILITY

The table below is an assessment of the proposed works against the relevant applicable DtS provisions of the BCA. Each line item provides a summary description of the Deemed-to-Satisfy (DtS) provision and comments on the status of compliance



No	BCA Requirements	Status of Compliance	Discussion
Access and Facilities for People with Disabilities – Sections D, E and F			
1.	<p>General building access requirements – Introduction</p> <p>Section D4 requires suitable access for people with disability be provided to and within all areas of the building normally used by the occupants.</p> <p>Note accessibility requirements within the BCA that apply to this building include:</p> <ul style="list-style-type: none"> • D4 for general access for people with a disability. • E3D7 and E3D8 for accessibility design to passenger lifts. • F4D5 for accessibility design to sanitary facilities. <p><i>Note: the Disability (Access to Premises – Buildings) Standards 2010 (Premises Standards) need to be considered. These are generally in keeping with BCA requirements unless otherwise stated.</i></p>	Note only	
D4D3 Access to Buildings			
2.	<p>Access from the Allotment Boundary</p> <p>The BCA requires that a continuous accessible path of travel be provided from the allotment boundary at the main points of pedestrian entry to the main entrance.</p>	Complies in Principle.	
3.	<p>Access Between Buildings on Site</p> <p>The BCA requires a continuous accessible path of travel be provided between associated accessible buildings.</p> <p>Design of accessways between buildings required to be accessible comply with requirements of AS 1428.1.</p> <p>This should include but be not limited to:</p> <ul style="list-style-type: none"> • site levels/gradients/crossfalls • path widths • materials including slip resistance properties • location of drainage points along accessways • threshold ramps at pedestrian entrances, kerb ramps, ramps, handrails etc as applicable. 	Complies in Principle	Generally, the linkages between the buildings appear to be sufficient to accommodate the required turning and passing spaces, however there are varying gradients and crossfalls.
4.	<p>Building Entrances</p> <p>The BCA requires a continuous, accessible path of travel to be provided through the principal pedestrian entrance and not less than 50% of all pedestrian entrances,</p>	Complies in Principle	



No	BCA Requirements	Status of Compliance	Discussion
	<p>except for pedestrian entrances serving only areas exempted by D4D5.</p> <p><i>Note: where the total floor area of the building exceeds 500m², the distance of travel between accessible and inaccessible entrances must not exceed 50m.</i></p>		
D4D4 Parts of Buildings to be Accessible & AS 1428.1 Design for Accessibility			
5.	<p>Doors – Circulation Spaces</p> <p>All doors required to be accessible must fully comply with Section 13 of AS 1428.1.</p> <p>Doorways must be provided with circulation spaces in accordance with Clause 13.3 and relevant approach in Figures 31 and 32.</p> <p><i>Note: circulation spaces at doorways must have a gradient and crossfall not steeper than 1 in 40.</i></p>	Complies in principle - additional information required to confirm compliance	<p>At this REF stage there are several doors which do not provide adequate door circulation dimensions to satisfy the requirements of this Clause.</p> <p>This can be coordinated to comply during subsequent detailed design development stages.</p>
6.	<p>Door Clear Opening Width</p> <p>Doorways located within a required accessible path of travel for people with a disability must have a clear door opening width of not less than 850mm in accordance with Clause 13.2 of AS 1428.1.</p> <p>Where a door required to be accessible has more than one door leaf, the active leaf must have a clear opening of not less than 850mm.</p> <p><i>Note: some smoke and acoustic seals can impact on the clear opening width of a door. 870mm and 920mm doorsets may not achieve the 850mm clear opening width.</i></p>	Complies in principle - additional information required to confirm compliance	<p>At this REF stage there are several doors which do not provide adequate door clear opening widths to satisfy the requirements of this Clause.</p> <p>There appears to be new works to Building G, however the existing doors do not provide the required opening</p> <p>This can be coordinated to comply during subsequent detailed design development stages.</p>
7.	<p>Door Controls</p> <p>All doors required to be accessible must be provided with controls and related hardware that fully comply with Clause 13.5 of AS 1428.1.</p> <p>Door controls must be capable of being unlocked/opened by one hand and prevent the hand of a person who cannot grip from slipping whilst operating the latch.</p> <p>Door handle design should take into consideration the following requirements, including, but not limited to:</p> <ul style="list-style-type: none"> • clearance of 35mm to 45mm between handle and back plate. • height between 900mm – 1100mm. • touch controls (security) located 500mm from internal corners <p><i>Note: the locations of controls of doors, gates and the like are not required to meet</i></p>	Additional information required to confirm compliance	<p>At this REF phase, door control detail and specifications have not been provided. This can be coordinated to comply during subsequent detailed design development stages.</p> <p>We request the following additional information to confirm compliance:</p> <ul style="list-style-type: none"> • Detail door hardware specifications <p>This can be coordinated to comply during subsequent detailed design development stages.</p>



No	BCA Requirements	Status of Compliance	Discussion
	<p><i>AS 1428 for early childhood centres, swimming pool barriers or similar situations where the action of these controls is prescribed by the relevant statutory authority.</i></p>		
8.	<p>Door Operating Forces</p> <p>All doors required to be accessible must be able to be operated without exceeding the following:</p> <ul style="list-style-type: none"> • force to initially open the door must not exceed 20N • force to swing or slide the door must not exceed 20N • force to hold the door open between 60 ° and 90 ° must not exceed 20N <p><i>Note: does not apply to fire doors or smoke doors where a door closer is fitted.</i></p>	<p>Additional information required to confirm compliance</p>	<p>At this REF phase, door control detail and specifications have not been provided. This can be coordinated to comply during subsequent detailed design development stages.</p> <p>We request the following additional information to confirm compliance:</p> <ul style="list-style-type: none"> • Information regarding operational forces to be achieved for proposed door closers.
9.	<p>Luminance Contrast for Doors</p> <p>Clause 13.1 of AS 1428.1 requires all accessible doorways to have a minimum luminance contrast of 30% equivalent to a 50mm band between the door and the door frame or adjacent walls.</p> <p>Refer to Clause 13.1 of AS1428.1 for further clarification where luminance contrast is required.</p>	<p>Additional information required to confirm compliance</p>	<p>At this REF phase, colour selections of door and walls have not been provided. This can be coordinated to comply during subsequent detailed design development stages.</p> <p>We request the following additional information to confirm compliance:</p> <ul style="list-style-type: none"> • Colour selections of doors / walls.
10.	<p>BCA D3D16 Door Thresholds</p> <p>The threshold of a doorway must not incorporate a step or ramp at any point closer to the doorway than the width of the door leaf</p>	<p>Additional information required to confirm compliance</p>	<p>At this REF phase door thresholds have not been proposed.</p> <p>This can be coordinated to comply during subsequent detailed design development stages.</p>



No	BCA Requirements	Status of Compliance	Discussion
11.	<p>Internal Paths of Travel</p> <p>Accessways complying with AS 1428.1 (2009) must be provided to and throughout areas of buildings required to be made accessible, including:</p> <ul style="list-style-type: none">• minimum corridor widths of not less than 1000mm• passing spaces with a minimum width of 1800mm and minimum length of 2000mm to be provided in corridors at maximum 20m intervals where a direct line of sight is not available• turning spaces of minimum 1540mm width and minimum 2070mm length to be provided within 2m of the end of corridors and at maximum 20m intervals• Increased landings are required at changes of direction, including 1500mm X 1500mm turning spaces to facilitate a 60-90 degree turn <p><i>Note: In the design of the accessible path of travel, reference should be made to Clause 6 and Figure 2 of AS 1428.1 for the minimum width and heights. No obstructions are allowed within the clear required width including but not limited to skirtings, telephones, switchboards, extinguishers and door handles less than 900mm above finished floor level.</i></p>	Complies in principle	At this REF stage the building has generally been provided with adequate corridor widths, passing spaces.
12.	<p>Floor Finishes</p> <p>The following applies to interior finished and surface materials:</p> <ul style="list-style-type: none">• D4D4 of the BCA requires where carpet or any soft flexible materials are used as flooring material, the pile height or pile thickness is to be no greater than 11mm and the carpet backing to be not more than 4mm thick• AS1428.1 (2009) Clause 7 requires matting recessed within a continuous accessible path of travel to have a surface level difference to surrounding materials not more than 3mm for vertical and 5mm for rounded or bevelled edge.• AS1428.1 (2009) Clause 7 specifies grates are to have openings no greater than 13mm in diameter and any slotted openings to be no more than 13mm wide and orientated perpendicular to the dominant direction of travel	Additional information required to confirm compliance	<p>At this REF phase, floor specifications have not been provided. This can be coordinated to comply during subsequent detailed design development stages.</p> <p>We request the following additional information to confirm compliance:</p> <ul style="list-style-type: none">• Floor finishes specification and design detail of the proposed abutment of floor surfaces/ finishes.



No	BCA Requirements	Status of Compliance	Discussion
13.	<p>D3D15 – Slip Resistance of Floor Finishes</p> <p>Slip resistance surfaces are required to be provided to stairs, ramps and their landings in accordance with BCA Table D3D15, that is:</p> <ul style="list-style-type: none"> • for dry conditions: <ul style="list-style-type: none"> ○ for ramps steeper than 1:14 – not less than P4 or R11 ○ for ramps between 1:14 and 1:20 grade – not less than P3 or R10 ○ for treads or landings – not less than P3 or R10 ○ for nosings or landings edge strips – not less than P3 • for wet conditions: <ul style="list-style-type: none"> ○ for ramps steeper than 1:14 – not less than P5 or R12 ○ for ramps between 1:14 and 1:20 grade – not less than P4 or R11 ○ for treads or landings – not less than P4 or R11 ○ for nosings or landings edge strips – not less than P4 	Additional information required to confirm compliance	<p>At this REF phase, slip resistance floor specifications have not been provided. This can be coordinated to comply during subsequent detailed design development stages.</p> <p>We request the following additional information to confirm compliance:</p> <ul style="list-style-type: none"> • floor finishes specification and design detail of the proposed ramps, landings and edge strip.
14.	<p>Switches and General Purpose Outlets - General</p> <p>Clause 14 of AS1428.1 requires all switches and controls on an accessible path of travel, excluding general purpose outlets to be located:</p> <ul style="list-style-type: none"> • between 900mm and 1100mm above the plane of the finished floor • not less than 500mm from internal corners except where installed on the latch side architrave <p>It is recommended the specific location of switches be nominated on design documentation.</p>	Additional information required to confirm compliance	<p>At this REF phase, switches and general-purpose outlet specifications have not been provided.</p> <p>This can be coordinated to comply during subsequent detailed design development stages.</p> <p>We request the following additional information to confirm compliance:</p> <ul style="list-style-type: none"> • specification and design detail of the proposed switches and general-purpose outlet.
15.	<p>Switches and General Purpose Outlets</p> <p>Clause 14 of AS1428.1 requires all switches and controls on an accessible path of travel, excluding general purpose outlets to be located:</p> <ul style="list-style-type: none"> • between 900mm and 1100mm above the plane of the finished floor; and • not less than 500mm from internal corners except where installed on the latch side architrave. <p>Clause 14 of AS1428.1 requires general purpose outlets to be located:</p> <ul style="list-style-type: none"> • between 600mm and 1100mm above the plane of the finished floor; and • not less than 500mm from internal corners. 	Additional information required to confirm compliance	<p>At this REF phase, switches and general-purpose outlet locations have not been provided.</p> <p>This can be coordinated to comply during subsequent detailed design development stages.</p> <p>We request the following additional information to confirm compliance:</p> <ul style="list-style-type: none"> • design detail documentation of the proposed switches and general-purpose outlet indicating location.



No	BCA Requirements	Status of Compliance	Discussion
	<p>Light and GPO switches require larger format controls with:</p> <ul style="list-style-type: none"> • Rocker action and toggle switches of min 30mm x 30mm dimensions; and • Push-pad switches of min 25mm diameter. <p>It is recommended the specific location of switches be nominated on design documentation.</p>		
16.	<p>Stairs - Non Fire Isolated Stairs</p> <p>All stairways, excluding fire-isolated stairs, must be designed and constructed in accordance with AS 1428.1. In particular:</p> <ul style="list-style-type: none"> • clause 11.1(b) – Setback requirements at intersections at internal corridors. • clause 11.1(c) – Risers of opaque construction • clauses 11.1(d) to (g) – Design of stair nosings including profile and identification strip • clause 11.1 (h) – Tactile ground surface indicators (also AS1428.4.1) • clause 11.2(b) – Handrails to both sides of stair • clause 11.2(c) – Handrail to have no vertical sections • clauses 11.2(d) to (f) - Extension of handrails at top and bottom of flight. • clause 12 – Design and construction of handrails 	Complies in principle - additional information required to confirm compliance	<p>At this REF phase, detail stair design has not been provided.</p> <p>This can be coordinated to comply during subsequent detailed design development stages.</p> <p>We request detail stair design to confirm compliance.</p> <ul style="list-style-type: none"> • Stair details and elevations identifying stair handrail profiles, stair nosings and tactile indicators.
17.	<p>D3D22 – Handrails</p> <p>As per BCA D3D22(1)(f) handrails within the fire isolated stairways are required to comply with Clause 12 of AS 1428.1, except that Clause 12(d) does not apply to a second, lower-height handrail in a Class 9b primary school required by D3D22(1)(c)(ii).</p> <p>The height of handrails is to be between 865-1000mm and be consistent along the length of the stair (does not apply to lower handrail in primary school stair).</p> <p>Incorporate the design of a staggered stair to avoid handrail extensions intruding into stairway landings, particularly in the down flight.</p>	Additional information required to confirm compliance	<p>At this REF phase, detail stair design has not been provided.</p> <p>This can be coordinated to comply during subsequent detailed design development stages.</p> <p>We request detail stair design to confirm compliance.</p> <ul style="list-style-type: none"> • Stair details and elevations identifying stair handrail profiles, stair nosings and tactile indicators.



No	BCA Requirements	Status of Compliance	Discussion
18.	Ramps All ramps, excluding fire-isolated ramps used for emergency egress purposes only, must be designed and constructed in accordance with Clause 10.3 of AS 1428.1.	Complies in principle - additional information required to confirm compliance	At this REF phase, detail ramp design has not been provided. This can be coordinated to comply during subsequent detailed design development stages. We request detail stair design to confirm compliance. <ul style="list-style-type: none">Ramp details and elevations identifying stair handrail profiles, stair nosings and tactile indicators.
19.	AS1428.1 – Abutment of Surfaces The abutment of surfaces to have a smooth transition (design transition to be 0mm). Refer to Clause 7.2 and Figure 6 for further clarification. Note construction tolerances are provided for: <ul style="list-style-type: none">0 ±3mm for vertical edges0 ±5mm for edges with a bevelled or rounded to reduce the likelihood of tripping	Additional information required to confirm	At this REF phase, detail design of abutment of floor surfaces have not been provided. This can be coordinated to comply during subsequent detailed design development stages. We request the following additional information to confirm compliance as follows: <ul style="list-style-type: none">Walkway surface detailsFloor set down plansDoor threshold details
D4D5 Exemptions			
20.	The following areas are not required to be accessible: <ul style="list-style-type: none">a) An area where access would be inappropriate because of the particular purpose for which the area is used.b) An area that would pose a health or safety risk for people with a disability.c) Any path of travel providing access only to an area exempted by (a) or (b).	Complies in Principle – additional information required to confirm compliance	It is intended that the following areas will be deemed exempt areas due to the Position Description of the occupants: <ul style="list-style-type: none">Cleaner RoomsCOMMSPlant RoomsCanteenStore Rooms



No	BCA Requirements	Status of Compliance	Discussion
D4D7 Signage			
21.	<p>Braille and tactile signage is required to be provided throughout any building required to be made accessible in accordance with BCA Specification 15 and AS1428.1 (2009) and must identify:</p> <ul style="list-style-type: none"> • each sanitary facility • any space with a hearing augmentation system • accessible unisex facilities and indicate whether the facility is suitable for left or right handed use • ambulant accessible sanitary facilities on the door of the cubicle • where an entrance is not accessible, directional signage to identify nearest accessible entrance • where a bank of sanitary facilities is not provided with an accessible sanitary facility, directional signage to identify nearest accessible sanitary facility. • each door required by Part E4D5 to be provided with an exit sign and state "Exit" and "Level" followed by either the floor level number, the floor descriptor or combination of these. 	Additional information required to confirm compliance	<p>We request the following additional information to confirm compliance as follows:</p> <ul style="list-style-type: none"> • Drawings detailing signage specifically designed for people with disabilities. Note: Signage package should include a typical elevation indicating the location of installation <p>It is understood this requirement to be addressed during subsequent design stages.</p>
D4D8 Hearing Augmentation			
22.	<p>Where an inbuilt amplification system is installed (other than one for emergency purposes only) a hearing augmentation system must be provided:</p> <ul style="list-style-type: none"> • in a room in a Class 9b building, or • in an auditorium, conference room, meeting room or room for judicatory purposes, or • at a ticket office, tellers booth, reception area or the like, where the public is screened from the service provider. <p>Induction loop- 80% coverage required. Infrared system or the like - 95% coverage required.</p> <p><i>Note: A room containing hearing augmentation, Clause D4D7 requires signage including the international symbol for deafness to be provided.</i></p> <p><i>Note: Consideration to the design specifications of AS 1428.5 (2010) is recommended, however is not mandatory to meet the BCA or Premises Standards.</i></p>	Complies in Principle - Additional information required to confirm compliance	<p>We request the following additional information to confirm compliance as follows:</p> <ul style="list-style-type: none"> • Hearing augmentation consultant to provide certification. <p>It is understood this requirement to be addressed during subsequent design stages.</p>



No	BCA Requirements	Status of Compliance	Discussion
D4D9 Tactile Indicators			
23.	<p>Tactile ground surface indicators (TGSIs) are required to warn people who have a vision impairment they are approaching a hazardous location, such as –</p> <ul style="list-style-type: none"> • stairways (other than fire isolated stairways) • escalator • passenger or moving walk • ramp other than <ul style="list-style-type: none"> ○ A fire isolated ramp ○ Step ramp ○ Kerb ramp or ○ Swimming pool ramp <p>In the absence of a suitable barrier –</p> <ul style="list-style-type: none"> • an overhead obstruction less than 2m above the floor level, other than a doorway; and • 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. <p>Refer to AS1428.4.1 for further clarification of the design for colour, luminance contrast, dimensions and locations of the tactile ground surface indicators.</p> <p><i>Note: tactile ground surface indicators are not required in areas exempted under Clause D4D5.</i></p>	Complies	At this concept design stage, the location of the TGSIs have been provided to stairs and ramps on the accessible path on travel where new works require building or construction approval requires TGSIs
D4D12 Ramps			
24.	<p>On an accessway –</p> <p>(a) A series of connected ramps must not have a combined vertical rise of more than 3.6m; and</p> <p>(b) A landing for a step ramp must not overlap a landing for another step ramp or ramp.</p>	Complies in Principle	At this concept design stage standard ramp detail design has been provided to assess the requirements of this Clause.
D4D13 Glazing on an Accessway			
25.	<p>On an accessway, where there is no chair rail, handrail or transom, all frameless or fully glazed doors, sidelights and glazing capable of being mistaken for a doorway or opening, must be clearly marked in accordance with AS1428.1.</p> <p>A solid contrasting line is required.</p> <p>Refer to Clause 6.6 of AS1428.1 for details of:</p> <ul style="list-style-type: none"> • location 	Additional information required to confirm compliance information required to confirm	It is understood this requirement to be addressed during subsequent design stages.



No	BCA Requirements	Status of Compliance	Discussion
	<ul style="list-style-type: none"> height luminance contrast <p><i>Note: In many instances, the frosted type material may not achieve the required luminance contrast.</i></p>		
E3D7 Passenger Lifts			
26.	<p>E3D7 has specific requirements for type of lift that can be used.</p> <p>Passenger lifts suitable for people with a disability are provided in E3D7 but each type of lift has some limitations for its use.</p> <p>Each type of lift also requires the provision of accessible features listed in E3D8 Note this includes but is not limited to the design of the following:</p> <ul style="list-style-type: none"> handrails lift car size door opening width control buttons <p><i>Note: Where a wheelchair user is required to complete a 90 degree turn within a lift car, the lift car must possess internal dimensions of not less than 1500mm x 1500mm, to maintain a continuous accessible path of travel. Refer also to Clause 6.5 of AS 1428.1 (2009).</i></p>	Complies in Principle - additional information required to confirm	<p>The building R is proposed with 1 no. lift passenger lift. Confirmation has been provided that the proposed internal dimensions of all lifts will be not less than 1400mm (w) X 1600mm (d)</p> <p>We request the following additional information to confirm compliance as follows:</p> <ul style="list-style-type: none"> When available detail lift shop drawings to be provided to Philip Chun Accessibility for review and approval <p>It is understood this requirement to be addressed during subsequent design stages.</p>
F4D5 Sanitary and Other Facilities			
27.	<p>For this Class 9 building the following accessible facilities are required (<i>except to a ward area of a Class 9a health-care building</i>):</p> <ul style="list-style-type: none"> 1 x accessible unisex sanitary compartment on every storey containing sanitary compartments 1 x accessible unisex sanitary compartment at not less than 50% of the banks of toilets in the building 1 x ambulant sanitary compartment for use by males and females at every bank of toilets, where an accessible unisex facility is provided at that bank 	Complies	



No	BCA Requirements	Status of Compliance	Discussion
28.	<p>AS1428.1 – Design of Unisex Accessible Sanitary Facilities</p> <p>All unisex accessible sanitary facilities to fully comply with AS 1428.1 (2009) Clause 15 and 16, including but not limited to:</p> <ul style="list-style-type: none"> • location of sanitary fixtures and fittings • location, profile and dimension of grab rails • clear width of the door opening • circulation spaces to doorways, fixtures and fittings • requirement for a shelf • lever taps • toilet seat with 30% luminance contrast • WC back rest details • door lock, in-use indicator and bolt or catch, with Any snib catch handle to have minimum length of 45mm 	Compliance can be achieved	<p>We request the following additional information to confirm compliance as follows:</p> <ul style="list-style-type: none"> • Provide line drawing showing dimensions of location set out of fixtures and fittings. • Fixtures and fittings specifications <p>It is understood this requirement to be addressed during subsequent design stages.</p>
29.	<p>AS1428.1 – Ambulant Accessible Sanitary Facilities</p> <p>Sanitary facilities suitable for people with an ambulant disability must be designed in accordance with the requirements of Section 16 and associated figures of AS1428.1, including but not limited to:</p> <ul style="list-style-type: none"> • location of WC • location, profile and dimension of grab rails • ambulant circulation spaces to doorway and WC • clear width of the door opening • door lock/In use indicator and bolt or catch 	Compliance can be achieved	<p>We request the following additional information to confirm compliance as follows:</p> <ul style="list-style-type: none"> • Provide line drawing showing dimensions of location set out of fixtures and fittings. • Fixtures and fittings specifications <p>It is understood this requirement to be addressed during subsequent design stages.</p>

4. RECOMMENDATIONS

We have reviewed the documentation available to date and have reviewed the proposed building works with respect to the Building Code of Australia 2022 and Premises Standards. The design is in the REF submission phase and further design development is required for access assessment. The finer details with respect to BCA 2022 compliance can be finalised during subsequent design stages as noted in the above table.

5. MITIGATION MEASURES

Table 1 Mitigation Measures

Table 2 – Mitigation Measures			
Mitigation Number/ Name	When is Mitigation Measure to be complied with	Mitigation Measure	Reason for Mitigation Measure
BCA Compliance	During design and throughout construction	1. All building work to be designed and carried out in accordance with the National Construction Code Series, Building Code of Australia, Volume 1 and 2 (as applicable). Where	Achieve BCA compliance to ensure occupant safety, provide



		<p>compliance with the provisions deemed to satisfy is not possible, a schedule of performance solutions will be required.</p> <ol style="list-style-type: none">2. Any access design amendments or additional information is to be addressed prior to the issue of construction documentation phase.3. Items are still being developed at this stage and will need reassessment at the detail design phase with respect to justification of performance solutions and further assessment as the design changes and progresses. Coordination with the design team will be needed to determine if the intent is to propose a DtS solution.	<p>accessible built environment, meet the minimum acceptable levels of occupant amenity and ensure buildings are energy efficient.</p> <p>BCA compliance is required to meet the minimum legislative requirements.</p>

6. EVALUATION OF ENVIRONMENTAL IMPACTS

Adherence to the BCA Provisions of BCA Volume 1 2022-part D4 E3 & F2 is not considered to be a significant impact to the environment under section 5.7 of the EP&A Act.