GROUPDLA

ACCESS REPORT

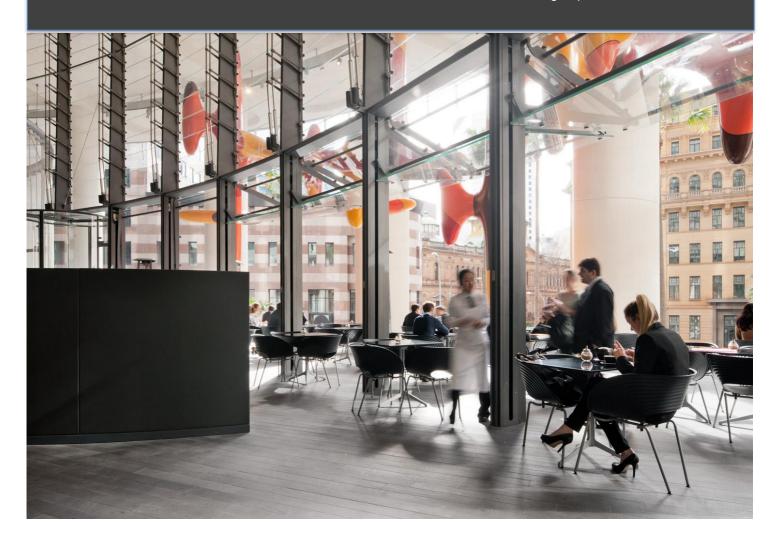
PROJECT: Lismore South Public School – Flood recovery Rebuild

PROJECT NO: GDL 240133

PREPARED FOR: NSW Department of Education (DoE)

REVISION: **F**

DATE: 06/06/2025 www.groupdla.com.au





REVISION HISTORY

Dovision	evision Date Details		Authorised	
Revision			Name/Position	Signature
А	31/05/2024	Concept Design review	Prepared: Elisa Moechtar, Manager, Access Consultancy (ACA No. 198)	
		Concept Design	Prepared: Natasha Knopf, Access Consultant	
В	14/06/2024	100% review	Reviewed: Elisa Moechtar, Manager, Access Consultancy (ACA No. 198)	
		Schomatic Docian	Prepared: Natasha Knopf, Access Consultant	
С		Schematic Design 100% review	Reviewed: Elisa Moechtar, Manager, Access Consultancy (ACA No. 198)	
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		Schematic Design	Prepared: Natasha Knopf, Access Consultant	
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F	F 06/06/2025 Schematic Design 100% - REF Submission	Prepared: Natasha Knopf, Access Consultant	Kropl	
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Table 1 - Revision History

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1.0 **EXECUTIVE SUMMARY**

1.1 **Proponent**

The Department of Education (DoE) is the landowner, proponent and determining authority pursuant to Section 5.1 of the Environmental Planning and Assessment Act 1979 (the Act).

1.2 Introduction

This Access Report has been prepared to support a Review of Environmental Factors (REF) for the rebuild of Lismore South Public School (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 activity will be carried out at Lismore South Public School (LSPS) located 69-79 Kyogle Street, South Lismore (the site).

The purpose of this report is to document the access provisions and requirements of the proposed new works and the compliance strategy to ensure that the design is capable of compliance with the access requirements of the Federal Disability (Access to Premises – Buildings) Standards 2010 ('Premises Standards'), the access provisions of Volume 1 of the Building Code of Australia 2022 ('BCA') and referenced Australian Standards (AS), with consideration of the objectives of the Federal Disability Discrimination Act 1992 (DDA).

The access review has been limited to an assessment of the Schematic Design Architectural drawings and supporting FFE and Finishes Schedules. The Report is based on assessment of the documentation listed in Appendix A -Documentation Assessed to this report and information provided by the client and is intended for their use only.

1.3 **Assessment**

Upon review, it is the opinion of Group DLA Access that, with ongoing detailing of the access provisions, design requirements, and recommendations outlined within Chapter 4.0 Accessibility Assessment of this access report, the proposed design is capable of compliance with the accessibility requirements outlined above.

Further development of detailed design requirements, such as details of stairs, sanitary facilities, and other access facilities and features, will be included within future design documentation for review. This will then be developed and refined for eventual construction documentation and assessed prior to Crown Certification stage.

The items in the table below have been noted as items of relevance at this stage of the review. The items that have been considered non-compliant require further review against the detailed design, or where noted may be able to be justified as an Access Performance Solution:

No.	Item	Query or DtS Non-Compliance	Suggested Resolution	References	BCA Performance Requirement(s)
1.	Door circulation	Multiple doors have clearance issues including latch-side, hinge-side, clear open width and/or required 900x900 min circulation on the path to ambulant cubicles.	Design review for DtS compliance	BCA D4D2 AS1428.1:2009 CI 13.3 and Fig 31, 33	D1P1

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No.	Item	Query or DtS Non-Compliance	Suggested Resolution	References	BCA Performance Requirement(s)
2.	Height of external ramps	Ramps have 3.95m vertical rise which exceeds the 3.6m max vertical rise allowed for a series of connected ramps.	Performance Solution (PS) is required for compliance. Refer Section 4.9 Ramps for design features required for PS justification	BCA D4D12 AS1428.1:2009 CI 10 AS1428.2:1992 CI 8, 6.5	D1P1, D1P2
3.	Handrails	All new ramps and stairways require handrails that are compliant to AS1428.1:2009 CI 11.2 and 12 and appropriately enclosed to avoid obstructing movement on the transverse path of travel. Open for review in multiple areas.	Design review for DtS compliance	BCA D4D4 AS1428.1:2009 CI 11.2, 12, Fig 17	D1P1, D1P2
4.	Underside clearance height of ramps, stairways	Underside of various stairs and ramps adjacent to open accessible areas to be suitably enclosed where the overhead heights are less than 2M AFFL.	Design review for DtS compliance	BCA D4D2 AS1428.1:2009, AS1428.4.1:2009	D1P1, D1P2
5.	Unisex accessible toilet LH/RH distribution	The current provision provides an imbalance in distribution of LH and RH pan layouts	For equitable provision the following changes have been proposed: • Staff use: Change either NR1005 or OR1011 to LH • Primary Student use: Change both LR1008 and OR1010 to LH	BCA F4D5	F4P1
6.	Step free path within Preschool (Ground Floor and Level 1)	No accessible, independent path of travel within the secure Preschool area	Performance Solution (PS) required for compliance. Refer Section 4.4 for requirements	BCA D4D2, D4D3	D1P1

No.	Item	Query or DtS Non-Compliance	Suggested Resolution	References	BCA Performance Requirement(s)
7.	Accessible car parking space	No accessible car parking space for each required accessible building (i.e. Preschool and Primary School) on the allotment.	Provide an additional accessible car parking space for DtS compliance	BCA D4D6	D1P1
8.	Accessible toilet circulation	Construction tolerance for multiple accessible toilets beyond the minimum required circulations, i.e. 1900mm W x 2300mm L for WC pan circulation	Design review for DtS compliance	BCA F4D5	F4P1
9.	After hours entrance path of travel	No step free path of travel provided from the nominated After Hours entrance, required	1. Stairway to be changed to a AS1428.1 compliant ramp, if possible (preferred option), or 2. Nominated After Hours entrance to be moved to the east entry on Kyogle Street which is to function as both the Main Visitors and After Hours entrance	BCA D4D3	D1P1

Table 1.3.1 – High level summary of query or DtS non-compliance



1.4 Further information for future design development

In order to confirm the design complies with the accessibility provisions of the Premises Standards and the BCA, the following items listed in Table 1.4.1 below are required to be clarified, submitted, illustrated, etc, during design development stage:

No.	Item	Comment	Premises Standards / BCA Reference
A	Walkway, Ramps & Stair Details	1:20 or 1:50 details of proposed external walkways, ramp system & stairs are required for further assessment. The details are to include compliant dimensioning of all relevant components, i.e. gradients, lengths, unobstructed widths between (ramp and stair) handrails on both sides, landings (1200mm minimum if no turning), passing bays (1800 x 2000 minimum), turning bays (1540 x 2070 minimum), handrails (diameter of min 30-50 mm clearances, etc.) kerb-rails/edge protection, steps (riser and goings, etc), TGSIs, where applicable.	D4D4 D4D12
В	Passenger Lift Details	Detailed lift plans, elevations, lift type & specification for the proposed passenger lift will be required for assessment as the design progresses. The details are to include compliant dimensioning of lift car circulation area requirements, inclusion & set outs of access features, handrail, lift call/controls, door clearance and door circulation etc to comply with BCA Part E3D7 and AS1735.12.	E3D7 E3D8
С	Sanitary Facility Layouts and Details and FF & E schedule	1:20 or 1:50 plans, elevations/details of the proposed and required sanitary facilities (accessible WC & ambulant toilets) will be required for further assessment. The details are to include compliant dimensioning of all circulation area requirements, set outs of sanitary fixtures etc to comply with AS1428.1:2009. The proposed use (Staff or student) is required to be confirmed at next design stage	F4D5 F4D6 F4D7
D	Accessible Door Details, including Luminance Contrast Strategy	External and internal door openings to be identified with compliant door clearances and door circulation and design details for internal and external doorways, including door schedules, door hardware schedule, threshold details, lightweight operation and luminance contrast strategy.	D4D2 D4D4
E	Hearing Augmentation System/s	Details of any areas where inbuilt amplification is proposed (not solely for emergency warning) within new works/building areas, and the proposed hearing augmentation system.	D4D8
F	Signage Strategy	Signage Schedule to be provided during design development, compliant with BCA Part D4D7 and Specification 15. No detailed information is available at the current stage of the design development. Signage information generally not required at the development application stage. Additional information will be required for assessment prior to Building Approval. Please refer to the section below for details.	D4D7
G	BCA D4D5 Exempt Areas	Formal advice & documentation on any areas seeking BCA D4D5 exemption (subject to Certifying Authority approval) is to be provided for assessment as the design progresses.	D4D5

No.	Item	Comment	Premises Standards / BCA Reference
		At this stage, a preliminary assessment of potential areas warranted to be exempt under this clause are discussed within the report under Section 4.19	
Н	Material and Finishes Schedule – Slip Resistance	During future design development stages, all required accessible areas will require slip resistance rating of all ground surfaces using a Wet Pendulum Method compliant with AS4586 and Standards Australia Handbooks HB197 & 198.	D4D2, D4D4, and AS1428.1
I	Landscaping design details	Landscape design documentation, inclusive of RLs with nominated pathway gradients, crossfalls and width dimensions is required to ensure that all required accessways to the building and connecting to external accessible facilities is in compliance with AS1428.1:2009	D4D3, D4D4 and AS1428.1
J	Access Performance Solutions	Input and advice from the team will be required in relation to any proposed Access Performance Solutions that are required/proposed in future stages. The agreement/concurrence with other Stakeholders including Client/building end user will be necessary as part of the Performance Brief (PBDB) process before they are confirmed as part of the final access compliance strategy.	Various

Table 1.4.1 – Detailed information to be supplied in future detail design stages

2.0 INTRODUCTION

2.1 Report Purpose

The purpose of this report is to document the access provisions and requirements of the proposed new works and the compliance strategy to ensure that the design is capable of compliance with the access requirements of the Federal Disability (Access to Premises – Buildings) Standards 2010 ('Premises Standards'), the access provisions of Volume 1 of the Building Code of Australia 2022 ('BCA') and referenced Australian Standards (AS), with consideration of the objectives of the Federal Disability Discrimination Act 1992 (DDA).

The access review has been limited to an assessment of the Schematic Design Architectural drawings and supporting FFE and Finishes Schedules. The Report is based on assessment of the documentation listed in Appendix A – Documentation Assessed to this report and information provided by the client and is intended for their use only.

2.2 Reporting Team

The information contained within this Report was prepared by Natasha Knopf, Access Consultant from Group DLA Access and reviewed by Elisa Moechtar, ACA Accredited Access Consultant (No. 198) from Group DLA Access.

2.3 Legislative and Project Brief Requirements

This development submission is subject to the Environmental Planning and Assessment Act 1979 (NSW).

This present access report has considered the following legislation and referenced access standards:

- Federal Disability Discrimination Act 1992 (DDA);
- Federal Disability (Access to Premises Buildings) Standards 2010 (Premises Standards);
- Building Code of Australia 2022 (BCA); and
- Australian Standards: AS1428.1:2009, AS1428.4.1:2009, AS1735.12:1999, AS2890.6:2009

The following table summarises the key statutory issues relating to the BCA access provisions and the DDA Premises Standards in relation the assessment and certification of new buildings.

Issue	Legislative Reference	Comment
New Work	BCA (EPAR 145)	All new works must comply.
Access to Premises	Federal Disability (Access to Premises – Buildings) Standards 2010	Upgrade of the 'Affected Part' of existing building/s to provide access for people with disabilities - triggered by new work requiring Building Approval and Crown development.
Potential DDA Complaints	Federal Disability Discrimination Act (DDA)	Regardless of any new works, the development is subject to the Federal Disability Discrimination Act 1992 (DDA) which applies nationally.

Table 2.3.1 – Access Regulatory Framework Summary

A summary outline of these key reference documents is included below:

• The **DDA** objectives focus on the provision of equitable, independent, and dignified access to services, facilities and premises for people with mobility, sensory and cognitive disability. The DDA makes it is unlawful to discriminate against people on the grounds of disability.



"Premises" is broadly defined under the DDA, Section 23 to include not only buildings but many other aspects of the built environment, including streetscapes and open space areas as well as non-building elements like furniture, fixtures and fittings. The DDA covers existing buildings, including heritage buildings, those under construction and future premises. The DDA applies nationally and is a complaints-based legislation administered by the Australian Human Rights Commission (AHRC).

- The Premises Standards is a statutory instrument made under the DDA to outline how DDA obligations can be met for new building work. Its purpose is to ensure that dignified, equitable, cost-effective and reasonably achievable access to buildings and facilities, and services within buildings, is provided for people with disability and to give certainty to the people responsible for compliance that if the Standards are met, that they cannot be subject to a successful complaint under the DDA in relation to the matters covered by the Standards.
- The Premises Standards includes an Access Code for Buildings that is mirrored in the access provisions of the Building Code of Australia (BCA) in Parts D4, E3D7, E3D8, F4D5, F4D6, F4D7, and F4D12. Under the Premises Standards, new building work and the "Affected Part" of existing buildings must comply in the same manner as it is required to comply with the BCA, by meeting Deemed to Satisfy (DtS) provisions or by adopting a performance solution that achieves the relevant performance requirements. The DtS provisions reference Standards, including parts of the AS1428 suite to outline technical criteria and minimum requirements to achieve reasonable access provisions for people with disability.
- It is important to note that compliance with the Premises Standards and the Access Code will ensure that DDA non-discrimination requirements are met for all matters/areas covered by the Standards. However, for any matters/areas that are not covered by the Premises Standards, the over-arching DDA legislation will still apply and it cannot be guaranteed that a successful complaint cannot be lodged.
- An "Affected Part" upgrade is applicable to a building owner or a sole lessee of an existing building who is the applicant for a building approval permit. It is triggered by application for a Construction or Complying Development Certificate, or where new works are constructed for and on behalf of the Crown. For example, a new building, alterations and additions to an existing building or an application for a change in building use where building works are proposed or required to meet fire safety standards.

When new building works are being undertaken by the building owner within an existing building of specified Classes that requires a building approval (CC, CDC or Crown), the requirement to upgrade access applies to the area of new work and the affected part.

Note:

o If the lessee of a part of a building (which includes more than one lessee) submits the application for approval of the building work the upgrading of the affected part will not be applicable.

The affected part is defined below:

- The principal pedestrian entrance/s of an existing building that contains a new part; and
- 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.

The affected part is illustrated in diagrammatic form in Figure 2.3.1 below.

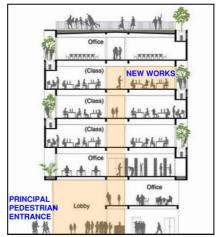


Figure 2.3.1 - Example of the "Affected Part"

- AS1428 Suite Design for Access and Mobility provides technical criteria and minimum requirements related
 to accessible design for the independent use of people with disability. It focuses on the provision of continuous
 accessible paths of travel, circulation spaces, facilities and access features for people using wheelchairs, with
 ambulant disabilities and with sensory (vision and hearing) disabilities.
 - Part 1: AS1428.1-2009 is referenced by the BCA and includes mandatory access requirements for the provision of access for people with disability for new developments. The 2009 revision of AS 1428.1 adopted the increased circulation requirements of AS 1428.2-1992 that were developed to satisfy the needs of 90% of people with disability between the ages of 18 to 60.
 - Part 4: AS1428.4.1-2009 is referenced by the BCA and contains mandatory access requirements for Tactile Ground Surface Indicators (TGSI) to assist the orientation of people with vision impairment.
- **AS1735.12-1999** is referenced by the BCA and contains mandatory access requirements for passenger lifts, escalators and moving walks to assist people with disability.
- **AS2890.6-2009** is referenced by the BCA and contains mandatory access requirements for accessible car parking (off-street) for people with disability.

2.4 Additional Design Guidelines

The Report also considers other relevant access design guidelines and/or advisory Standards (that do not form part of a formal Premises Standards/BCA assessment) to promote equity and dignity in line with the primary objectives of the DDA and a Universal Design approach, including:

- Centre for Excellence in Universal Design Universal and Inclusive Design Principles.
- Australian Human Rights Commission (AHRC) Advisory Note on Streetscape, Public Outdoor Areas, Fixtures, Fittings and Furniture – 8 February 2013
- Australian Standards: AS1428.2:1992 Enhanced and additional requirements Buildings and facilities
 Note:
 - This document provides information on parts of the built environment not covered by the DDA Access to Premises Standards that continue to be subject to potential DDA discrimination complaints by people with disability if they experience an access barrier.

A summary outline of key design planning considerations from the above guidelines is included below:

• The seven Universal Design Principles for consideration in the ongoing design of the development include:



Principle 1: Equitable UsePrinciple 2: Flexibility in Use

Principle 3: Simple and Intuitive Use
 Principle 4: Perceptible Information
 Principle 5: Tolerance for Error
 Principle 6: Low Physical Effort

Principle 7: Size and Space for Approach and Use

Universal Design provides numerous benefits for associated businesses, individual users and society in general. An inclusive environment that can be accessed, understood and used by as many people as possible makes good business sense, is more sustainable for the environment and is socially progressive.

2.5 Limitations

- This Report assesses the access provisions of the proposed development in general and does not include nor imply any assessment for design outside the minimum access provisions of the Federal Disability (Access to Premises – Buildings) Standards 2010 (Premises Standards), and accessibility provisions of the BCA.
- This Report does not provide comment on detailed design issues and cannot be considered sufficient for construction approval stage. Further assessment of the developing design and detailed architectural documentation would be required to verify access compliance for the purposes of construction approval.
- This assessment is limited to a desktop review of the documentation provided at the date of this report as referenced within Appendix A – Documentation Assessed to the Report.
- The Report represents the opinions of Group DLA Access based on the facts and matters known at the time of preparation of this document. Opinions, judgments, and recommendations detailed in this document, which are based on our understanding and interpretation of current statutory and regulatory obligations and standards, should not be interpreted as legal opinion.
- This Report does not include assessment in relation to the Education Facility Standard Guidelines (EFSG).

3.0 PROJECT PARTICULARS

3.1 **New Works: Site**

The site, located at 69-79 Kyogle Street, South Lismore, consists of two separate land parcels situated on either side of Wilson Street. The proposed activity will be undertaken on the eastern parcel, where most of the school's existing structures are located. The western parcel contains sports fields and temporary learning facilities. Figure 3.1.1 outlines the school's boundary, covering approximately 2.5 hectares. Due to flood damage, the existing buildings on the eastern parcel are currently unused, and students are temporarily using facilities on the sports field and oval, located on the western side of Wilson Street, adjacent to the primary school.



Figure 3.1.1 Aerial image of site (Source: Nearmap)

3.2 **New Works: Scope**

The proposed activity comprises the rebuild of the LSPS on the eastern parcel of the existing site, in South Lismore, and will be delivered in a single stage. The western parcel is out of the scope of the activity. Any works required on the western parcel (such as removal of demountable classrooms) will be subject to separate approval (if required).

A detailed description of the proposal is as follows:

- 1. Retention of the existing play equipment, Building K and covered outdoor learning area (COLA) on the western parcel.
- 2. Bulk earthworks, comprising fill and excavation and other site preparation works on the eastern parcel.
- 3. Construction of a new building on the eastern parcel for LSPS including:
 - a. A one storey building (with undercroft areas below) fronting Kyogle Street containing a general learning space (GLS) hub, hall, library, support hub, administration, and pre-school.
 - b. Undercroft outdoor learning areas as well as amenities and storage located on ground level.
- 4. Landscaping and public domain works, including tree planting, a games court in the northeast corner and an outdoor playing area adjacent to the preschool.
- 5. A car park on the eastern side of the site, with access from Kyogle Street.
- 6. Waste collection area access from Kyogle Street.
- 7. Multiple entrance points, including:
 - a. Primary and secondary entries distributed on site frontages.
 - b. Vehicular access point to provide access to waste collection/delivery areas and car parking.
- 8. Ancillary public domain mitigation measures.

Figure 3.2.1 below show the scope of works.





Figure 3.2.1 – Proposed site plan (Source: EJE Architecture)



3.3 **New Works: Building Classifications**

The table below sets out the building classifications (as confirmed by the BCA Consultant) of the new building works:

Building	Building Use	Building Classification
Level 1	Offices (school administration)	Class 5
Level 1	Education purposes (Classrooms, Multi-purpose Hall & Library)	Class 9b
Level 1	Early Childhood Centre (pre-school)	Class 9b

Table 3.3.1 - Building Classification

Areas Required to be Accessible under the Premises Standards / BCA

In accordance with the provisions of Part D4D2 of the BCA, the following areas of the building are required to be accessible:

Building	Building Class and Use	Access Requirements
Level 1	Class 5 - Offices (school administration)	To and within all areas normally used by the occupants.
Level 1	Class 9b – School - Education purposes (Classrooms, Multi-purpose Hall & Library	To and within all areas normally used by the occupants.
Level 1	Class 9b – School - Early Childhood Centre (pre- school)	To and within all areas normally used by the occupants.

Table 3.4.1 - Access Requirements

4.0 ACCESSIBILITY ASSESSMENT

4.1 Access to Buildings from Property Boundary

Requirements

To meet the Premises Standards 2010 / BCA, an accessway (i.e., a continuous accessible path of travel, compliant with AS1428.1) for people with a disability is required to the building from:

- The main points of a pedestrian entry at the allotment boundary; and
- Another accessible building connected by a pedestrian link; and
- Any required accessible carparking space on the allotment.

In addition, any common-use stairs, ramps, and walkways providing pedestrian access to the building are to be compliant with Premises Standards 2010 / BCA Part D4D4 and AS1428.1.

References

Premises Standards 2010 / BCA Parts D4D2, D4D3, D4D4, and AS1428.1

Assessment

External pedestrian access from the site boundary into the school is proposed as follows:

- Two (2) public & visitor entries via Kyogle Street. Adjacent to Kiss and Drop Zone and existing on street parking.
 - Main Visitors Entrance east entry
 - After Hours Entrance west entry
- One (1) student entry via Phyllis Street. Adjacent to Bus Drop Off.
- One (1) connecting path to west site across Wilson Street, to be used only under teacher supervision

At this stage there is limited detail on proposed site levels, however it is understood to be relatively level. New accessways will need to be developed in accordance with AS1428.1:2009 to meet the above access requirements.

The following areas have been flagged as outstanding and requiring review:

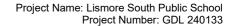
Stairway on the path of travel from the Kyogle Street west entry does not provide a compliant continuous
accessible path of travel to serve as the principal Entrance After Hours. Stepped pathway to be removed and
replaced with an AS1428.1 compliant ramp should these gates remain as the After Hours Entrance, or
alternatively the nomination of the Kyogle Street east entry as both the Main Visitors and After Hours
Entrance.

As the design develops, further detail is required on the following elements:

- Door hardware and/or intercom buttons at access gates to comply with AS1428.1 (refer to Section 4.6 Paths of Travel – Accessible Door Requirements)
- Directional signage at top and base of Stair 3 and Stair 4 in front of the Main Visitors and After-Hours
 entrances, to inform and direct people to alternate accessible paths of travel, as there is no clear line of sight
 from either entrance.

There is a new on-site carpark, situated on the east of the site, which contains one (1) accessible carparking space. The connecting accessway between the accessible carparking space and the under-croft of the school building will need to be developed in accordance with AS1428.1:2009 to meet the above access requirements.

Group DLA Access has reviewed the documentation for the purposes of this submission. Upon review, it is found that the design of the new works, as shown in the supplied documentation, is capable of achieving reasonable access





for people with disability to meet the above requirements. Further design detail and access review will be required during design development stage to ensure that appropriate access outcomes are achieved.

4.2 **New Buildings - Entrances**

Requirement

To meet the Premises Standards / BCA requirements for accessible entry for people with disability into the building, access is required through the principal pedestrian entrance (or parts of a building when building has separate functions/use), and:

- Through not less than 50% of all pedestrian entrances (except those serving only areas exempted by BCA Part D4D5); and
- A non-accessible pedestrian entrance must not be located more than 50m from an accessible pedestrian entrance (building more than 500m² total floor area), except for pedestrian entrances serving only areas exempted by BCA Part D4D5.
- Each accessible entrance is to have clear circulation spaces on both sides of doorways that are level, with an 850mm minimum clear opening width for the active leaf, compliant with AS1428.1.

References

Premises Standards 2010 / BCA Parts D4D2, D4D3, AS1428.1

Assessment

As noted previously, the means of vertical access to the raised school at Level 1 is via a passenger lift, an external ramp and various stairways. These elements will essentially form the 'entrances' to the Level 1 building areas and are covered in detail in sections to follow.

The enclosed building areas at the Undercroft and those at Level 1 have external entrances that will need to be developed and detailed for compliance and further review at DD/CC stage.

Group DLA Access has reviewed the documentation for the purposes of this submission. Upon review, it is found that the design of the new works, as shown in the supplied documentation, is capable of achieving reasonable access for people with disability to meet the above requirements.

4.3 **Emergency Egress**

Requirement

To meet BCA Part D2D22, required fire-isolated stair/ramp exits that serve accessible areas are required to include specific accessibility features for people with disability (i.e. ambulant and sensory) including:

- At least one continuous, consistent height handrail compliant with AS1428.1 clause 12 to meet BCA Part D2D22.
- To achieve a consistent height handrail (i.e. without vertical or raked sections), an off-set tread at the base of each stair flight or an increased mid-landing length to allow a one-tread handrail extension clear of egress route
- All fire-isolated egress stairs to include luminance contrasting step nosing that is slip-resistant in compliance with AS1428.1 to satisfy BCA Part D4D4.

References

BCA Parts D2D22, D4D4, and AS1428.1

Assessment

There are no fire-isolated stairs or fire-isolated ramps proposed as part of the new works.

The new external access ramp and stairways that will connect the new raised building Level 1 from the Undercroft will be used for both communication and egress purposes. The external ramp system will provide a means of independent step free egress in the event of an emergency for people in the Primary School only (given that in the event of a fire, the fire sliding door will close and Preschool will not have access to the external ramp or the passenger lift). Please refer to Section 4.9 Ramps and 4.10 Stairways for further details.

Group DLA Access has reviewed the documentation for the purposes of this submission. Upon review, it is found that the design of the new works, as shown in the supplied documentation, is capable of achieving reasonable access for people with disability to meet the above requirements.

4.4 Access Within Buildings – Paths of Travel & Circulation Requirements

Requirement

To meet the Premises Standards / BCA and provide access for people with disability to and within all common-use areas of the building required under BCA Part D4D2, accessways are to be provided throughout all parts of a building required to be accessible.

Accessways require the following minimum circulation areas to comply with AS1428.1:

- 1000mm minimum clear width path of travel (for linear direction), with increased clear width areas required for doorway circulation, turning, etc.;
- All doors to common-use areas require 850mm minimum clear opening width (generally 920mm minimum door leaf) with provision of clear door circulation space on both sides and level threshold transitions, compliant with AS1428.1 (for doors, refer comments under separate item: Paths of Travel – Accessible Door Requirements);
- Turning spaces (1500mm x 1500mm) compliant with AS1428.1 where users are required to turn through 90 degrees;
- Passing spaces (1800mm W x 2000mm L) compliant with AS1428.1 at 20m maximum intervals where a direct line of sight is not available; and
- Turning spaces (1540mm W x 2070mm L) compliant with AS1428.1 within 2m of the end of accessways (including corridors or the like) and at 20m maximum intervals along an accessway.

References

Premises Standards 2010 / BCA Parts D4D2, D4D4, and AS1428.1

Assessment

Horizontal paths of travel and circulation areas for the proposed design are generally appropriate for this stage of design with walkways that connect the passenger lift, external ramp and stair access proposed for vertical access between the under-croft entry level and the raised level 1 area where school is located.

At Level 1, the design includes wide covered external circulation areas and a COLA, which have appropriate widths that will allow for required turning spaces and door circulation areas to be achieved.

From the Undercroft of the Primary School, vertical access to the raised school areas at Level 1 is via a passenger lift (refer to Section 4.11 Passenger Lifts) and an external ramp (refer to Section 4.9 Ramps) that form the accessible path of travel and will need to be developed in accordance with AS1428.1:2009. Stairways are also required to comply with AS1428.1:2009 for people with ambulant disability (refer to Section 4.10 Stairs).

Access within the secure Preschool areas however does not contain a step-free path of travel between building levels, due to the removal of the external Preschool ramp connecting Ground Floor and Level 1 areas. The two schools have been assessed by BCA Consultant as two separate Class 9b buildings, both of which require access to and within all areas normally used by the occupants via accessible paths of travel (Premises Standard D3.1). AS1428.1:2009 Cl 6.1 states a continuous accessible path of travel shall not include a step or stairway.

The Schematic Design update to remove the external ramp connecting Ground Floor and Level 1 secure Preschool areas is a DtS non-compliance by the above definition. Note: the location of the lift is outside the Preschool gates that are non-accessible – given they are required to have door controls at 1500-1650mm AFFL - thereby the lift may not be accessible for all persons. A **Performance Solution** is proposed (subject to Stakeholder concurrence) to justify the current design, which would require:

- Provision of an access gate between the Ground Floor Preschool Undercroft PR0004 and the Lift Lobby PR0002, and Level 1 Preschool Foyer PR1013 and Entry PR1001 including:
 - a) Accessible intercom with the operative part location to be between 900-1250mm FFL (900-1100mm preferred) to meet AS1428.1 for assistance as required.



- b) Accessible MagnaLatch or similar door control installed at all required early childhood centre barriers, that can be positioned at an accessible height for the independent use on the path for people with access needs. Note: the MagnaLatch still relies on use of a MLAK key to operate. however assuming that regular users would know/be advised of this and then either have their own MLAK or have access to/use of a MLAK key that is available on site.
- Documented Management plan from the Operator/School committing to the increased supervision to move children with access needs between levels as required, and commitment to provide operationally managed solution to and from the lift access to the same extent that access to the stairs is provided and available.
- Allocate a number of parking spaces for Preschool use (to distinguish between the two schools which are classified under the BCA as separate buildings) and in turn the nomination of at least one (1) accessible carparking space for Preschool for DtS compliance. This accessible parking space will increase choice for users that require a step free path of travel by reducing the travel distance to the lift (which will function as the primary vertical access point to the Preschool).

In addition, the following areas are outstanding and require design review:

Ground Level underside of stairs and ramps anticipated to have overhead heights less than 2M AFFL. These are to be suitably contained by enclosing the area, or by installing a handrail with kerbs or a kerbrail in accordance with AS1428.4.1:2009 CI 2.6, Fig 2.6A.

As the design develops, further detail is required on the following elements:

- Recommendation to provide minimum 30% luminance contrast vertical columns used in open play to aid in the detection of the columns for all users moving through the space (DDA/Advisory)
- Consideration to provide an accessible path of travel through the indicative furniture layout in all Level 1 learning spaces. This may be used as a guide for staff to manage room layouts to accommodate a student or staff with access needs (DDA/Advisory)

Group DLA Access has reviewed the documentation for the purposes of this submission. Upon review, it is found that the design of the new works, as shown in the supplied documentation, is capable of achieving reasonable access for people with disability to meet the above requirements.

Paths of Travel - Accessible Floor Surface Requirements 4.5

Requirement

Accessways require suitable ground and floor surfaces that comply with AS1428.1 to be traversable by people with disability including:

- Level abutment between surfaces with a smooth transition (i.e. 0mm with construction tolerance of 3mm vertical or 5mm with chamfered/rounded edge permitted)
- Carpet pile height to not exceed 11mm and carpet backing thickness not more than 4mm
- Grates with minimised opening size i.e. circular openings 13mm maximum diameter, slotted openings 13mm maximum wide and oriented with long dimension transverse to dominant direction of travel (Heelguard grates 8mm maximum width recommended/preferred)
- All floor surfaces to be slip resistant, compliant with AS1428.1 with minimum slip ratings to BCA Table D3D15. AS4586 and Australian Standards Handbooks HB 197 & HB 198 (wet pendulum method) to suit context/location.
- The following table includes the minimum slip resistance classifications required for some common locations:

Building Element / Area	Surface (Surface Condition		
Building Element / Area	Wet Pendulum Test - Dry	Wet Pendulum Test - Wet		
Ramp steeper than 1:14	P4	P5		
Ramps not steeper than 1:14	P3	P4		
Wet Areas e.g. Toilets		P3		
Transitional Areas e.g. Entry Lobby	P2	P3 (Preferred)		
Dry Areas e.g. Internal room	P1			
Stair tread and landings	P3	P4		
Stair nosing and landing edge strip	P3	P4		

References

Premises Standards 2010 / BCA Parts D4D2, D4D4, and AS1428.1

Assessment

The new works proposes a variety of flooring surfaces that are required to meet the above requirements.

The following areas have been flagged for review as the design progresses:

- All new footpaths are to have hardstand surfaces with crossfall no steeper than 1:40 or 1:33 for bitumen and to have a level transition to abutting surfaces
- Recommendation Yarning Circle and Community Gathering Space surface to meet AS1428.1 requirements for accessible floor surfaces achieved by using hardstand surface or stabilised compacted material, for equity and inclusion of a range of different users (DDA/Advisory)

In addition to the requirements listed above, further detail is required at the detail design stage on the following elements:

Suppliers to provide NATA accredited slip results that reference AS4586:2013 P-rating to confirm compliance

Group DLA Access has reviewed the documentation for the purposes of this submission. Upon review, it is found that the design of the new works, as shown in the supplied documentation, is capable of achieving reasonable access for people with disability to meet the above requirements.

4.6 Paths of Travel – Accessible Door Requirements

Requirement

To meet the Premises Standards 2010 / BCA and provide access for people with disability to and within all commonuse areas of the building required under BCA Part D4D1, all doorways on accessways require the following to comply with AS1428.1:

- 850mm minimum clear opening width active leaf (generally 920mm minimum door leaf) with provision of clear door circulation space on both sides and level threshold transitions, compliant with AS1428.1 clause 13;
- For double leaf doors, at least one active leaf door is required to achieve 850mm minimum clear opening width.
- Provide 30% minimum luminance contrast between doorway openings and adjacent surfaces, compliant with AS14281 clause 13.3
- Door circulation space to be located on level landings no steeper than 1:40 gradient. The circulation space required will depend on the door type ie. swing or sliding and the angle of approach ie. frontal, side etc.
- All accessible entrance doors and associated door hardware and controls to comply with AS1428.1 clause 13.5
- Doors to have lightweight operational force (20N) or may need power-operation with accessible controls.
- All fully glazed doors, sidelights and or glazing where there is no chair rail, handrail or transom, capable of being mistaken for a doorway or open doorway is to include visual indicators to comply with AS1428.1 clause 6.6.

References

Premises Standards 2010 / BCA Parts D4D2, D4D4, and AS1428.1

Assessment

At this stage, the design generally allows sufficient space for door clearances and circulation to be achieved. However, the following items are noted for further review:

- Circulation clearance issues outstanding for:
 - Sliding door between NR1002 and 1009 latch side less than 510mm. Design review for DtS compliance.
 - Door from OR1019 to OR1012, to have latch side clearance clear of any proposed joinery on internal side
 - Door from NR1003 to NR1004 to have latch side clearance of at least 340mm for a side approach when the door swings away from the user
 - Door from PR1013 to PR1003 to have latch side clearance of at least 510mm for a front approach when the door swings away from the user
- LR0005 Bicycle Store is assessed as a common-use area required to be accessible. As such it will require entry doors with 850mm minimum clear width opening and detailed in compliance with AS1428.1:2009.
- LR1005 doors do not have 900x900mm minimum circulation between door leaves or 900x900mm minimum circulation within LR1004. Circulation clear of door swing required for all doors on route to ambulant facilities.

As the design develops, further detail is required on the following elements:

- Install location of all door controls including handles, intercoms and security controls to be compliant to AS1428.1 Cl 13.5.3
- Design of all door hardware to be compliant to AS1428.1 Cl 13.5.2 and Cl 13.5.4 for power operated door controls where relevant
- Force to operate manual doors shall not exceed 20N
- All doorways to have luminance contrast of 30% minimum to an adjacent surface, to define the door opening
- NOTE: Door details are yet to be provided at this early stage of the design process and will be developed in line with access requirements for compliance during DD/CC Stage.

Group DLA Access has reviewed the documentation for the purposes of this submission. Upon review, it is found that the design of the new works, as shown in the supplied documentation, is capable of achieving reasonable access for people with disability to meet the above requirements. Further design detail and access review will be required during design development stage to ensure that appropriate access outcomes are achieved.

4.7 Glazing on Accessways

Requirement

The Premises Standards 2010 / BCA have requirements for the provision of visual indicators on glazing on an accessway to ensure safe access for people with disability to ensure glazing cannot be mistaken for a doorway or opening.

Visual indicators are required on an accessway where there is no chair rail, handrail or transom, frameless or fully glazed doors, sidelights and any glazing capable of being mistaken for a doorway or opening.

All glazing is to comply with AS1428.1:2009, Clause 6.6 – Visual Indicators on Glazing.

References

Premises Standards 2010 / BCA Part D4D13, and AS1428.1

Assessment

Contrasting strip glazing decals are anticipated to be used in the new works and are to developed in line with access requirements for compliance during DD/CC Stage.

Group DLA Access has reviewed the documentation for the purposes of this submission. Upon review, it is found that the design of the new works, as shown in the supplied documentation, is capable of achieving reasonable access for people with disability to meet the above requirements.

4.8 **Walkways**

Requirement

The Premises Standards 2010 / BCA have walkway requirements to ensure access for people with disability that include:

- All walkways to comply with AS 1428.1 clause 10.
- Walkways to have a 1:20 maximum gradient, landings at maximum 15m intervals with landing dimensions in compliance with AS1428.1.
- Walkways require regular level landing areas and edge protection on any exposed sides (i.e. raised kerb, kerb and handrail, low wall) in compliance with AS1428.1

References

Premises Standards 2010 / BCA Part D4D4, AS1428.1

Assessment

Walkway details, such as gradients, crossfalls and surface/finishes are yet to be provided at this early stage of the design process and will be developed in line with access requirements for compliance during DD/CC Stage. New external footpaths are to be surrounded by level surfaces for a minimum width of 600mm along the length of the walkway, in accordance with AS1428.1:2009 CI 10.2.

Group DLA Access has reviewed the documentation for the purposes of this submission. Upon review, it is found that the design of the new works, as shown in the supplied documentation, is capable of achieving reasonable access for people with disability to meet the above requirements.

4.9 Ramps

Requirement

The Premises Standards 2010 / BCA have ramp requirements to ensure access for people with disability that include:

- All ramps (excluding leading solely to areas exempted under BCA Part D4D5) are to be compliant with AS1428.1 clause 10;
- 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.

To satisfy AS1428.1, all ramps require:

- 1:14 maximum gradient, landings at 9m maximum intervals and landing dimensions in compliance with AS1428.1
- Ramps are to be recessed from the site boundary (900mm) and from other paths of travel (400mm) to allow handrail extensions to not encroach over the traverse path of travel, compliant with AS1428.1; and
- Ramp width dimensions to allow for 1000mm minimum required access and/or egress path with suitably sized landings in addition to space for required handrails and kerb-rails on both sides, compliant with AS1428.1.
- Ramps (with gradients between 1:14-1:20) to include TGSI in compliance with AS1428.4.1 to satisfy BCA D4D9.

References

Premises Standards 2010 / BCA Parts D4D4, D4D9, D4D12, and AS1428.1

Assessment

There is one (1) external ramp system Ramp 1 located on the western side of the site will provide a step free path of travel between the Ground Floor Undercroft of the Primary School to Level 1 Primary School areas. Access to the Preschool on Level 1 is also possible, via a hold open fire door, and moving through the preschool secure entry gate.

The ramp serves as the primary step free path of travel for a person entering via Student Entrance gates on the northern side of the site.

The ramp has a switch-back configuration and intermediate landings with extended length to allow for waiting and rest areas, outside the main path of travel. The raised level 1 building area has a finished floor level height 3.95M above Ground Floor, which has been determined in line with flood requirements.

In addition, there is one (1) internal ramp system Ramp 5 MR1003 serving as a step free access path to Stage MR1002.

The following issues require further review:

- The external ramp system has 3.95M vertical rise which exceeds the 3.6M max. vertical rise allowed for a series of connected ramps. A **Performance Solution** (**PS**) is required for compliance. Subject to Stakeholder review and concurrence, the PS justification would be reliant on the ramps achieving:
 - Compliance with AS1428.1:2009
 - Enhanced access features including 1800mm min. clear width between handrails to allow for two-way traffic OR passing bays (1800mm W x 2000mm L min.) at 6 metre max. intervals (AS1428.2:1992). Note: Ramp handrails are required to be separate to any required BCA safety barriers.
 - Increased length of intermediate switch back landings to allow for rest areas, ideally with seating provision.
- Recommendation for external ramp ramp sections should be no greater than 6M in length to allow for sufficient rest stops, and that all ramp sections are as even as possible in length (DDA/Advisory)



- To document construction tolerance for all ramp gradients to ensure no ramp is steeper than 1:14 (maximum compliant grade)
- Handrail extensions at the top and base of ramps are to be contained to avoid collision with the handrail when moving on the transverse path of travel
- Handrails required to extend for minimum 300mm past ramp transition point plus compliant termination.
- No section of ramp with a grade up to 1:14 is to exceed 9M in length. Open for review on the first run of Ramp

As the design develops, further detail is required on the following elements:

- Tactile Ground Surface Indicators to be set out 300mm (+/-10mm) from the ramp transition point and have depth of 300-400mm for landings less than 3M, or 600-800mm for landings 3M or greater.
- Handrail profile and installation height, including all exposed edges and corners of handrails are to be rounded to radius of at least 5mm

Group DLA Access has reviewed the documentation for the purposes of this submission. Upon review, it is found that the design of the new works, as shown in the supplied documentation, is capable of achieving reasonable access for people with disability to meet the above requirements.

4.10 Common-Use Stairways

Requirement

The Premises Standards 2010 / BCA has stair requirements to ensure access for people with disability (ambulant and sensory) that include:

- All non-fire-isolated stairways must comply with AS1428.1 clause 11.
- Stairs are to be recessed from the site boundary (900mm) and from other paths of travel (400mm at top and 650mm minimum at base) to allow for handrail extensions not to encroach over the traverse path of travel, compliant with AS1428.1.
- Stairs require provision of an off-set stair tread at base of stair flights to provide a continuous, consistent height handrail along the full stair flight, compliant with AS1428.1.
- Ensuring stair layout dimensions allow for minimum required access and/or egress path width requirements and suitably sized landings in addition to space for continuous handrails on both sides, compliant with AS1428.1.
- All stairs require handrails on both sides in compliance with AS1428.1;2009 clause 12.
- All steps require luminance contrasting step nosing that is slip-resistant for compliance with AS1428.1.
- Stairways require TGSI in compliance with AS1428.4.1 to satisfy BCA Part D4D4.

References

Premises Standards 2010 / BCA Part D4D4, AS1428.1

Assessment

There are six (6) external stairs and one (1) internal stair (connecting Circulation MR1006 and Stage MR1002) that are included in the design. All stairways will be used for communication purposes and require access features that are to be detailed for compliance during DD/CC Stage.

The following issues require further review:

- Stair underside areas next to paths of travel with less than 2M vertical height above FFL to be suitably enclosed by walls, or handrails with kerbrails, or kerbrails to meet AS1428.1:2009 and AS1428.4.1:2009.
- Internal stair located at MR1005 contain construction tolerance on top of the 1M min width required between handrails
- Handrail extensions at the top and base of all stairs are to be contained to avoid collision with the handrail when moving on the transverse path of travel
- All stair handrail required to follow compliant extension and termination. Open for review in multiple areas.
- Recommendation consider providing landings (top, intermediate and base) at Stair 5 PR1021 to support
 the movement of young children in large groups more easily. NOTE: Stair 5 is the only stair within the secure
 preschool area. Increased circulation space at top landing will ensure groups can gather clear of the hinged
 door swing on Level 1 for safety in design (DDA/Advisory)

As the design develops, further detail is required on the following elements:

- Stair nosing to be compliant to AS1428.1:2009 Cl 11.1 and Fig 27B, including a maximum set back of 25mm between the nosing/contrasting strip edge to the base of the riser, and shall not project beyond the face of the riser.
- Tactile Ground Surface Indicators to be set out 300mm (+/-10mm) from the base riser or top nosing, and have depth of 300-400mm for landings less than 3M, or 600-800mm for landings 3M or greater.
- Handrail profile and installation height, including all exposed edges and corners of handrails are to be rounded to radius of at least 5mm

Group DLA Access has reviewed the documentation for the purposes of this submission. Upon review, it is found that the design of the new works, as shown in the supplied documentation, is capable of achieving reasonable access for people with disability to meet the above requirements. Further design detail and access review will be required during design development stage to ensure that appropriate access outcomes are achieved.

4.11 **Passenger Lifts**

Requirement

The Premises Standards / BCA has passenger lift requirements within accessible buildings to ensure access for people with disability that include:

- Every passenger lift is to meet BCA Part E3D7
- Every passenger lift is to include accessible features as per BCA Part E3D8 and AS1735.12
- Lift car dimensions to have 1100mm (W) x1400mm (L) minimum dimensions for less than 12m travel distance (and/or for existing buildings, based on the Premises Standards' lift concession), and 900mm min. lift door clearance.
- Lift car dimensions to have 1400mm (W) x1600mm (L) minimum dimensions for more than 12m travel distance.

For compliance with AS1428.2 (Enhanced Access Standard recommended for consideration):

Every passenger lift car is to have minimum internal dimensions of 1400mm x 1700mm.

References

Premises Standards 2010 / BCA Parts D4D4, E3D7, E3D8, and AS1735.12

Assessment

One (1) passenger lift (travel distance no more than 12 m) located on the eastern side off the site provides access from the undercroft areas of the Primary School Ground Floor to Level 1 Primary School areas. Access to the Preschool on Ground Floor and Level 1 is also possible, via a hold open fire door and moving through the preschool secure entry gate.

The lift serves as the main step free access path for entry gates on Kyogle Street and the entry adjacent to the accessible carparking space. There is a sliding fire door required for BCA reasons between the lift lobby and the primary school areas which is to be fixed/held open mode with automatic release to close upon fire trip as per BCA Consultant requirements. This will ensure access to the shared lift facility for primary school and preschool occupants during general use/access mode.

At this stage, the lift car size is anticipated to be beyond what is the minimum required for DtS compliance in support of enhanced access and increased flexibility and options for users. Internal lift car dimensions are yet to be confirmed at this stage of the design. Lift design certification and detailed drawings to be provided for review during DD/CC Stage.

Group DLA Access has reviewed the documentation for the purposes of this submission. Upon review, it is found that the design of the new works, as shown in the supplied documentation, is capable of achieving reasonable access for people with disability to meet the above requirements.

4.12 **Accessible Sanitary Facilities & Showers**

Requirement

The Premises Standards 2010 / BCA have requirements for the provision of accessible sanitary facilities and showers to ensure access for people with disability within areas of a building required to be accessible, including:

BCA Part F4D6 Accessible Unisex Sanitary Compartments

Class of Building	Minimum Accessible Unisex Sanitary Compartments to be provided
Class 5, 6, 7, 8 or 9 – except for within a ward area of a Class 9a health care building	Where F4D5(a) requires closet pans – (a) 1 on every storey containing sanitary compartments; and (b) Where a storey has more than 1 bank of sanitary compartments containing male and female sanitary compartments, at not less than 50% of those banks.

BCA Part F4D7 - Accessible Unisex Showers

Class of Building	Minimum Accessible Unisex Sanitary Compartments to be provided
Class 5, 6, 7, 8 or 9 – except for within a ward area of a Class 9a health care building	Where F4D4 requires 1 or more showers, not less than 1 for every 10 showers or part thereof.

- At least 1 accessible unisex toilet is required at each bank of toilets (where provided) on each storey, compliant with BCA Table F4D5 and AS1428.1 clause 15. If more than 1 toilet bank is provided on each level, an accessible toilet is required at a minimum of 50% of toilet banks, however when there are separate uses/functions provided, then at least 1 unisex accessible toilet is to be provided at each bank for each different function/use area.
- Generally, an accessible unisex toilet room requires minimum internal dimensions of either 2350mm (W) x 2350mm (L) or 2000mm (W) x 2750mm (L), based on AS1428.1 Figs 43 and 50 to ensure required 1900mm (W) x 2300mm (L) minimum circulation space around pan, with washbasin to sit outside this area.
- An accessible unisex sanitary facility and shower must be located so that it can be entered without crossing an area reserved for one sex only.
- An accessible unisex sanitary compartment or an accessible shower need not be provided on a storey or level not required by BCA Part D4D4(f) to be provided with a either passenger lift or a ramp complying with AS1428.1.

Note:

Minimum room dimensions for unisex accessible toilets are between finished walls and do not include allowance for construction tolerance. Minimum room size is variable and dependent upon basin selection.

References

Premises Standards 2010 / BCA Parts F4D5, F4D6, F4D7, and AS1428.1

Assessment

At this stage, the design includes the following proposed accessible toilet and/or shower facilities:



Level	Location	Area	Use	LH	RH	Comment
1	NR1005	Primary	Staff		1	
1	OR1011	Primary	Staff Shower		1	
Staff distribution		0	2	Change either OR1011 or NR1005 to LH layou		
Level	Location	Area	Use	LH	RH	Comment
Ground	PR0008	Preschool	Student		1	
1	PR1003	Preschool	Student Shower	1		
Preschool distribution		1	1	No change required		
Level	Location	Area	Use	LH	RH	Comment
						Comment
Ground	LR0003	Primary	Student		1	Comment
Ground 1	LR0003 LR1008	Primary Primary	Student Student		1	Proposed LH layout
Ground 1					1 1 1	
Ground 1 1	LR1008	Primary	Student	1	1 1 1	
Ground 1 1 1 1	LR1008 MR1012	Primary Primary	Student Student	1	1 1 1 1	
1 1 1 1 1	LR1008 MR1012 NR1012	Primary Primary Primary	Student Student Student	1	1 1 1 1 1	

Table 4.12.1 Distribution and number of unisex accessible toilets and showers

The following issues require further review:

- As illustrated in Table 4.12.1, there is an imbalance in the distribution of LH and RH toilet pan layouts for staff use, and within the Primary School and Preschool areas. Design review for compliance is required to ensure equitable distribution.
- Construction tolerance for all WC pan circulations, notably NR1012, NR1005 and NR1014 WC pan circulation width at least 1900mm plus tolerance and length at least 2300mm plus tolerance.

As the design develops, further detail is required on the following elements:

Details of the internal layouts and FFE

Group DLA Access has reviewed the documentation for the purposes of this submission. Upon review, it is found that the design of the new works, as shown in the supplied documentation, is capable of achieving reasonable access for people with disability to meet the above requirements.



4.13 **Ambulant Sanitary Facilities**

Requirement

The Premises Standards 2010 / BCA have requirements for the provision of ambulant sanitary facilities to ensure access for people with disability within areas of a building required to be accessible as detailed below:

At each bank of toilets where there is one or more toilets in addition to an accessible unisex sanitary compartment at that bank of toilets, a sanitary compartment suitable for a person with an ambulant disability in accordance with AS 1428.1 clause 16 must be provided for use by males and females.

References

Premises Standards 2010 / BCA Part F4D5, and AS1428.1

Assessment

At this stage, the design includes the following proposed ambulant toilets:

Level	Location	Use	Male	Female
Ground	LR0001 M	Student	1	1
	LR0004 F			
1	LR1004 F	Student	1	1
	LR1006 M			
1	MR1011 M	Student	1	1
	MR1010 F			
1	NR1016 M	Student	1	1
	NR1015 F			
1	OR1008 F	Staff	1	1
	OR1009 M			
Total No.	Ambulant Male/Fen	5	5	

Table 4.13.1 Distribution and number of ambulant toilets

As illustrated in Table 4.13.1, the new works design includes provision for five (5) male ambulant and five (5) female ambulant toilets across the site.

The following issues require further review:

Staff Female and Male Ambulant toilets (OR1008 and OR1009 respectively) do not contain clear 900x900 circulation clear of the inward swinging door. Currently the require circulation is obstructed by the washbasin. Design review for compliance is required.

Room details of the internal ambulant toilet layouts are yet to be provided at this early stage of the design process but can be developed to achieve compliance with the above access requirements.

Group DLA Access has reviewed the documentation for the purposes of this submission. Upon review, it is found that the design of the new works, as shown in the supplied documentation, is capable of achieving reasonable access for people with disability to meet the above requirements.

4.14 Adult Change Facilities

Requirement

The Premises Standards 2010 / BCA have requirements for the provision of adult change sanitary facilities, as detailed below:

- An adult change facility is required in a Class 6 building that has a design occupancy of 3,500 or greater containing two or more sole occupancy units
- An adult change facility is required in a Class 9b sports venue that has a design occupancy of 35,000 spectators or greater, or which has a swimming pool with a perimeter 70m or greater.
- An adult change facility is required in a museum, art gallery, or theatre that has a design occupancy of 1,500 patrons or greater.
- Any adult change facility installed in accordance with the above is to comply with the requirements of BCA Specification 27

References

Premises Standards 2010 / BCA Part F4D12, Specification 27

Assessment

Part F4D12 of the Premises Standards 2010 / BCA prescribes a limited set of circumstances in which the provision of an adult change facility would be required. The proposed new works would not fall into any of those prescribed circumstances.

That said, the new works will, notwithstanding, include the provision of one such facility on Level 1 within the Support Unit. This would represent accessibility best practice and is in response to separate Client brief requirements.

The proposed accessible adult change facility will be detailed during design development phase to meet the applicable Client design requirements within the EFSG. On this basis, no further comments will be made regarding this facility as it will not form part of the access consultant scope and will be approved by SINSW and/or the school.

4.15 **Accessible Car Parking**

Requirement

The Premises Standards 2010 / BCA have requirements for the provision of car parking for people with a disability, includina:

- For a Class 5 and Class 9b development, 1 accessible carparking space is required for every 100 carparking spaces provided or part thereof.
- Each accessible car bay is to be designed in accordance with AS2890.6.
- An accessible path of travel is required from each accessible car bay to the associated building.
- Ensure minimum 2500 mm head clearance height to accessible carparking and shared space. Ensure minimum 2200 mm head clearance height from accessible carparking spaces to parking entrances and exits. Ensure services are outside of these height clearance requirements.

References

Premises Standards 2010 / BCA Parts D4D3, D4D6, and AS2890.6

Assessment

The design proposes a total of twenty-six (26) car parking spaces, inclusive of one (1) designated accessible car parking space on site as part of the new works. The accessible carparking space is located in close proximity to the passenger lift accessed via external entrance gate and movement through the fixed held open sliding fire door.

The following issues require further review:

- Given there are two separate schools on the allotment, the carparking area is required to contain an accessible car parking space for each building required to be accessible i.e. Primary School and Preschool. The addition of a second accessible carparking bay is a DtS requirement and will also support the Performance Solution issue - no accessible path of travel within the Preschool, being that there is an option for a person to use the accessible car bay as an accessible drop off bay with the most direct access to the lift.
- Recommendation: to provide an awning over the accessible parking space and shared zone, in line with an equitable approach to other car spaces on the building line that have cover. This recommendation will support any users who may take additional time to use the car space (DDA/Advisory)

Group DLA Access has reviewed the documentation for the purposes of this submission. Upon review, it is found that the design of the new works, as shown in the supplied documentation, is capable of achieving reasonable access for people with disability to meet the above requirements.

4.16 **Accessible Drop-Off**

Requirement

A drop-off facility would differ from a car parking bay in the sense that the period of use of a drop-off facility would be subject to a high degree of restriction.

Neither the Premises Standards 2010 nor the BCA have requirements for the provision of drop-off facilities that are required to be provided for people with a disability.

References

AS2890.6, AS1428.1

Assessment

The design documentation indicates an on-street Kiss and Drop Zone along Kyogle Street.

Recommendation (DDA/Advisory):

It is recommended that the drop off zone part of the ancillary works are designed to be accessible for people with disability in compliance with AS2890.6:2009 with provision of a kerb ramp access in compliance with AS1428.1:2009.

Further design detail is required to determine:

- Shared area (walkway) to be a firm, level surface, connected to the accessible drop off bay and level in relation to the parking space. Refer to AS/NZS 2890.6:2009 Fig 2.5
- Should the shared area (walkway) not be level to the parking bays, a compliant kerb ramp in accordance with AS1428.1:2009 is to be provided. Refer to AS/NZS 2890.6:2009 Fig 2.6
- Dimensions of the drop-off bay to meet AS/NZS 2890.6:2009 CI 2.2.2

4.17 **Hearing Augmentation**

Requirement

The Premises Standards 2010 / BCA have requirements for the provision of hearing augmentation systems for specific rooms and areas within buildings (where an inbuilt amplification system, other than one used only for emergency warning) is installed to ensure access for people with disability, including:

- In a room in a Class 9b building; or
- (ii) In an auditorium, conference room, meeting room or room for judicatory purposes; or
- (iii) At any ticket office, teller's booth, reception area or the like, where the public is screened from the service provider.
- The hearing augmentation system type and minimum coverage area is to be in accordance with BCA Part D4D8.
- Any screen or scoreboard associated with a Class 9b building and capable of displaying public announcements must be capable of supplementing any public address system (other than a public address system used for emergency warning purposes only).

References

Premises Standards 2010 / BCA Part D4D8

Assessment

It is anticipated that in-built amplification system/s may be provided within the various school areas, in particular within teaching spaces, meeting rooms, Library and the Hall. Where a fixed AV system is proposed, a hearing augmentation system would be required to be provided in accordance with BCA Part D4D8.

Such details are yet to be provided at this early stage of the design process but can be readily achieved. During design development documentation will need to identify the type of hearing augmentation system/s proposed and area coverage to meet BCA min. access requirements.

Group DLA Access has reviewed the documentation for the purposes of this submission. Upon review, it is found that the design of the new works, as shown in the supplied documentation, is capable of achieving reasonable access for people with disability to meet the above requirements. Further design detail and access review will be required during design development stage to ensure that appropriate access outcomes are achieved.

4.18 Signage

Requirement

The Premises Standards / BCA have requirements for the provision of accessible signage for specific facilities, features and services within carparks and buildings to ensure access for people with disability including:

- Braille and tactile signage complying with BCA Specification 15 and incorporating the International Symbol of Access, or Deafness as appropriate, to identify:
 - Sanitary facilities including accessible unisex sanitary facilities, accessible showers, ambulant toilets and Accessible Adult Change Facilities; and
 - ii. Rooms and space with a hearing augmentation system; and
 - iii. Door required by Part E4D4 to be provided with an exit sign and state 'Exit' and 'Level' and either:
 - a) The floor level number; or
 - b) A floor level descriptor; or
 - c) A combination of (a) and (b).
- Accessible carparking compliant with BCA Part D4D6 and AS2890.6.
- There are additional detailed Premises Standards 2010 / BCA signage requirements that outline how to identify and differentiate between specific accessible features and/or types of facilities as well as directional signage requirements to alternate entrances, sanitary facilities, lifts, etc, if/when not accessible.

References

Premises Standards 2010 / BCA Part D4D7, Specification 15

Assessment

Signage details are yet to be provided at this early stage of the design process but can readily be achieved to meet the relevant BCA access requirements for further review at next design stage.

As previously documented, there will be a requirement for additional directional signage positioned at the base of Stair 3 and Stair 4 to assist in directing visitors using the gates on Kyogle Street to locate the step free access path i.e. passenger lift and/or ramp. Directional signage would also be required at the top of stairs to direct users to the lift and/or ramp access points, when the location of the alternate accessible route is not clearly apparent.

Group DLA Access has reviewed the documentation for the purposes of this submission. Upon review, it is found that the design of the new works, as shown in the supplied documentation, is capable of achieving reasonable access for people with disability to meet the above requirements. Further design detail and access review will be required during design development stage to ensure that appropriate access outcomes are achieved.

GROUPDLA

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4.19 Exemptions – Areas not Required to be Accessible

Requirement

The Premises Standards / BCA makes allowance for specific areas to be exempt from access for people with disability in compliance with AS1428.1 where:

- Access is deemed inappropriate due to the purpose for which the area is used
- The area may pose a health and safety risk for people with disability.
- This also applies to paths of travel leading solely to the above exempt areas.

References

Premises Standards 2010 / BCA Part D4D5

Assessment

At this stage, there are various areas within the design that could be warranted as being Part D4D5 exempt from access requirements:

- Ground Floor: Cleaners Store, Outdoor Storage, Waste Enclosure, Garden Store, Pump
- Level 1: Cleaners Store and rooms, Main Switch Room, Comms Rooms, Airlock LR1019, Canteen/Office Store, Bulk Store, OSHC Store, Chair and Performance Store, KLA Store, Secure Store, Kiln/Store, Store, Outdoor Equipment Store

Group DLA Access has reviewed the documentation for the purposes of this submission. Upon review, it is found that the design of the new works, as shown in the supplied documentation, is capable of achieving reasonable access for people with disability to meet the above requirements.

4.20 External Landscaping

Requirement

The Premises Standards 2010 and the BCA require paths of travel that lead to buildings and connect buildings to be accessible. The Premises Standards 2010 and BCA do not otherwise make definitive prescriptions for accessible design outside of those areas. The adoption of designs in accordance with AS1428.1 and AS1428.2 would be recommended.

References

AS 1428.1 and AS1428.2

Assessment

Based on the information provided, there are a variety of landscaping elements described as Open Play Zones, Assembly Zone, Playing Court, various Nature Play Spaces and other unique elements such as Yarning Circle, Community Gathering Space and Welcome Totems. However, the focus for recreational space appears to be within and around the undercroft area, including the Primary School Undercroft NR0001, Preschool Undercroft PR0004 and the Preschool On Grade Play Area OR0018.

As the design progresses:

- All external paths leading to and surrounding the new building would need to include nominated dimensions for widths, gradients and crossfalls for review during further design stages.
- Consideration for access provisions and features (e.g. weather protection, rest seating, shade provision) should be provided in landscape areas to assist all users including people with disability to not only move through the landscaping elements but also to support rest, play and teacher supervision duties in accordance with AS1428.1 and AS1428.2 design guidance – DDA/Advisory
- Consideration to ensure that any trees/landscaping elements positioned near footpaths do not encroach on the 2M minimum clearance required above continuous accessible paths of travel and ideally do not produce excessive plant litter that would may be a trip hazard if the pathways are not suitably maintained

Group DLA Access has reviewed the documentation for the purposes of this submission. Upon review, it is found that the design of the new works, as shown in the supplied documentation, is capable of achieving reasonable access for people with disability to meet the above requirements.



5.0 APPENDIX A - DOCUMENTATION ASSESSED

This access report has been prepared with reference to the supplied documentation – Schematic Design 100% – as listed in the table below prepared by EJE Architects, dated 04.06.2025.

Drawing No.	Title	Rev	Date
A-020	SITE PLAN – GROUND FLOOR	R	03.06.2025
A-051	SIGNAGE PLAN	А	18.02.2025
A-100	GROUND FLOOR PLAN	R	03.06.2025
A-101	LEVEL 1 PLAN	Q	03.06.2025
A-200	ELEVATIONS – FLOOD LEVELS	J	18.02.2025
A-202	ELEVATIONS – SHEET 2	J	18.02.2025

Table 5.1 - Documentation Assessed



6.0 APPENDIX B - MARKUPS

