

12 January 2026

Our Ref: SYD225_017-4 (ACCESS) RT

School Infrastructure NSW
Sent via Email

Attention: Daniel Rickard

ACCESSIBILITY CAPABILITY STATEMENT FOR DA SUBMISSION
PROJECT NAME: FORMER SHOALHAVEN ANGLICAN SCHOOL
17 CROOBYAR ROAD, MILTON NSW 2538 - Lot 200 DP 1192140

1. INTRODUCTION

An assessment of the subject development has been undertaken by DC Partnership at the request of School Infrastructure NSW and relates to the existing school premises undergoing alterations and additions at the Former Shoalhaven Anglican School.

A summary of the scope of works is as follows;

- Building I (Hall) upgrade as multi-purpose facility including use for gymnasium and performance stage;
- Building H – Existing kitchen upgrade | VET (catering kitchen);
- Building V – Upgrade/ re-purpose as Site Reception, Admin and staff areas;
- Building A - Refurbishment of 4 GLS rooms and sanitary facilities;
- Upgrade grass playing field/ oval (Athletics track and full-sized rectangular sports field);
- 2 x new basketball courts (unenclosed);
- Demolition of buildings P, Q, R, S, T, U & W and replace with new car park and bus set-down area; new school perimeter and internal fencing (mixture of palisade and chainmesh);
- Partial Improvements to existing gravel access road; and
- Landscaping improvements following demolition Works and upgrade / new accessible paths of travel to meet accessibility compliance.

2. BACKGROUND

DC Partnership has been engaged to provide building regulatory advice regarding the compliance status of the proposed development when assessed against the relevant prescriptive requirements as contained within the Building Code of Australia (BCA) 2022.2 – Volume 1, including the Part D4 Access for People with a Disability, Parts E3D7 and E3D8 Passenger Lifts, Parts F4D5, F4D6, F4D7 Accessible Sanitary Facilities as applicable to this development.

This correspondence has been provided to assist with development of the masterplan and early concept design documentation. A broad assessment has been undertaken of the proposed design as detailed within the documentation listed in **Appendix 1**.

The advice being provided to date has been in the context of the following—

- Building Code of Australia (BCA) 2022.2 – Volume 1;
- AS1428.1-2021 Design for access and mobility Part 1: General requirements for access – New building work;
- AS1428.4.1-2009 Means to assist the orientation of people with a vision impairment – Tactile Ground Surface Indicators;
- AS1735.12-1999 Lifts, escalators and moving walks: Part 12 Facilities for persons with disabilities;
- AS2890.6:2009 Parking for people with a disability.

3. ASSESSMENT

In the context of this report and the BCA the proposed building use can be described as follows—

Table 1 – Building Classification

STOREYS	CLASSIFICATION	DESCRIPTION
One (1)	Class 5 Class 9b	School Administration (Building V) Assembly buildings (Hall) / School

In addition to undertaking a detailed assessment of the design against the prescriptive requirements of the BCA a preliminary performance-based assessment has also been undertaken.

The implementation of a performance-based approach in lieu of compliance with the deemed-to-satisfy (DtS) provisions of the BCA shall be disclosed to the relevant stakeholders and is subject to the approval of the certifying authority.

The **Table 2** below lists scenarios where we believe the adoption of a performance design may add value to development in-lieu of complying with the prescriptive (DtS) provisions—

Table 2 – Performance Solutions

ITEM	PROPOSED PERFORMANCE SOLUTION	BCA DtS CLAUSE	PERFORMANCE REQUIREMENT
1.	Within Building V, the staff accessible facility is not located at the bank of other staff amenities.	F4D6	F4P1
2.	Unisex staff facilities are proposed within Building V in lieu of Male and Female facilities and staff numbers exceed 10.	F4D5 (c)	F4P1

Table 3 below outlines the relevant accessibility measures that will be provided as part of the development such that compliance with the BCA is achieved, specifically with Part D4 Access for People with a Disability, Parts E3D7 and E3D8 Passenger Lifts, Parts F4D5, F4D6, F4D7 Accessible Sanitary Facilities and Part F4D12 Accessible adult change facilities.

Table 3 – Accessibility Measures

BCA CLAUSE	STATUTORY REQUIREMENT	ASSESSMENT
General building access requirements Clause D4D2	Buildings and parts of buildings must be accessible as required by this clause, unless exempted by D4D5. Class 5 and 9b Access is required to and within all areas normally used by the occupants. Class 7a Access is required to each accessible carspace.	Subject to design detail being developed (door schedule, internal finishes, ramp and stairway details), the overall masterplan refurbishment works to the existing buildings and new carpark are capable of achieving compliance with this clause.
Access to buildings Clause D4D3 (1)	An accessway must be provided to a building required to be accessible— a) from the main points of a pedestrian entry at the allotment boundary; and b) from another accessible building connected by a pedestrian link; and c) from any required accessible carparking space on the allotment.	There is one (1) main point of a pedestrian entry along the allotment boundary located at 17 Croobyar Road, Milton 2538. Where any gates are along the required accessways they will be upgraded to comply with AS1428.1 requirements. The accessway arrangement from the two (2) new accessible carspaces and the drop off zone to the subject upgraded buildings will be further detailed in detailed design documentation and shall comply with AS1428.1:2021.

BCA CLAUSE	STATUTORY REQUIREMENT	ASSESSMENT
Access to buildings Clause D4D3 (2)	In a building required to be accessible, an accessway must be provided through the principal pedestrian entrance, and— - through not less than 50% of all pedestrian entrances including the principal pedestrian entrance; and - in a building with a total floor area more than 500 m², a pedestrian entrance which is not accessible must not be located more than 50 m from an accessible pedestrian entrance, except for pedestrian entrances serving only areas exempted by D4D5.	Each main entrance into the upgraded buildings are to be accessible at Ground Floor. Given the buildings are existing, the Premises Standard requires from a singular principle pedestrian entrance to be upgraded only and along the affected part within the refurbished buildings to comply and therefore this clause is not applicable.
Access to buildings Clause D4D3 (3)	Where a pedestrian entrance required to be accessible has multiple doorways— - if the pedestrian entrance consists of not more than 3 doorways — not less than 1 of those doorways must be accessible; and - if a pedestrian entrance consists of more than 3 doorways — not less than 50% of those doorways must be accessible.	Not applicable.
Access to buildings Clause D4D3 (4)	For the purposes of Clause D4D3 (3), an accessible pedestrian entrance with multiple doorways is considered to be one pedestrian entrance where— - all doorways serve the same part or parts of the building; and - the distance between each doorway is not more than the width of the widest doorway at that pedestrian entrance (see Figure D4D3); and For the purposes of Clause D4D3 (3), a doorway is considered to be the clear, unobstructed opening created by the opening of one or more door leaves (see Figure D4D3).	Not applicable.
Access to buildings Clause D4D3 (5)	Where a doorway on an accessway has multiple leaves, (except an automatic opening door) one of those leaves must have a clear opening width of not less than 850 mm in accordance with AS 1428.1.	Typically all doors will be shown as single leaf and are to have a minimum 850mm clear width door opening. Where double leaves shown, the active leaf is to be minimum 850mm clear width.
Parts of building to be accessible Clause D4D4 (a)	In a building required to be accessible, every ramp and stairway, except for ramps and stairways in areas exempted by D4D5, must comply with— - for a ramp, except a fire-isolated ramp, clause 10 of AS 1428.1; and - for a stairway, except a fire-isolated stairway, clause 11 of AS 1428.1; and - for a fire-isolated stairway, clause 11.1(f) and (g) of AS 1428.1.	Stairs and ramps along the required accessways to the upgraded buildings and along the network of accessible paths to the new accessible carspaces of travel are to comply with AS1428.1. Detailed design documentation to be provided in due course. Note: There are no fire-isolated exits within the subject refurbished buildings.

BCA CLAUSE	STATUTORY REQUIREMENT	ASSESSMENT
Parts of building to be accessible Clause D4D4 (b)	In a building required to be accessible, every passenger lift must comply with E3D7 and E3D8.	(refer to Passenger Lifts section below)
Parts of building to be accessible Clause D4D4 (c)	In a building required to be accessible, accessways must have— a) passing spaces complying with AS 1428.1 at maximum 20 m intervals on those parts of an accessway where a direct line of sight is not available; and b) turning spaces complying with AS 1428.1— i. within 2 m of the end of accessways where it is not possible to continue travelling along the accessway; and ii. at maximum 20 m intervals along the accessway.	The buildings are capable of compliance with this clause. Detailed furniture layouts have been reviewed and areas with heavy fixed fixtures and furniture satisfy these requirements.
Parts of building to be accessible Clause D4D4 (f)	In a building required to be accessible, a ramp complying with AS 1428.1 or a passenger lift need not be provided to serve a storey or level other than the entrance storey in a Class 5, 6, 7b or 8 building— a) containing not more than 3 storeys; and b) with a floor area for each storey, excluding the entrance storey, of not more than 200 m ²	Not applicable.
Exemptions Clause D4D5	The following areas are not required to be accessible: 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).	The following rooms / areas and associated accessways have been afforded the concession under D4D5 based on the health or safety risk and therefore access for people with disabilities need not be provided to these areas – Bldgs A & V– Stores and Comms room; Bldg I – Chair store, Large store, Cleaners/Store and Comms. Written confirmation at CC stage required from client confirming areas to be considered under D4D5 exemptions.
Accessible carparking Clause D4D6 (1)	Accessible carparking spaces— a) subject to (b), must be provided in accordance with Clause D4D6 (2) in— i. a Class 7a building required to be accessible; and ii. a carparking area on the same allotment as a building required to be accessible; and b) need not be provided in a Class 7a building or a carparking area where a parking service is provided and direct	There are two (2) proposed accessible carspaces identified within the 35 spaces carparking area and numbers of spaces comply.

BCA CLAUSE	STATUTORY REQUIREMENT	ASSESSMENT
	access to any of the carparking spaces is not available to the public; and c) subject to (d), must comply with AS/NZS 2890.6; and d) need not be identified with signage where there is a total of not more than 5 carparking spaces, so as to restrict the use of the carparking space only for people with a disability. For each Class of building to which the carpark or carparking area is associated, the number of accessible carparking spaces required is as follows: Class 9b For a school — 1 accessible space for every 100 carparking spaces or part thereof.	
Signage Clause D4D7 and Specification 15	Signage in accordance with this clause and details within AS1428.1 are to be provided to identify sanitary facilities, hearing augmentation, non-accessible pedestrian entrances, directional signage and exit levels, where applicable.	The building is capable of achieving compliance with this clause. Signage package to be submitted with detailed design documentation in accordance with this clause, Specification 15 and AS1428.1.
Hearing Augmentation Clause D4D8	As design progresses, consideration shall be given to the hearing augmentation provisions. A hearing augmentation system must be provided where an inbuilt amplification system, other than one used only for emergency warning, is installed— a) in a room in a Class 9b building; or b) in an auditorium, conference room, meeting room or room for judicatory purposes; or c) at any ticket office, teller's booth, reception area or the like, where the public is screened from the service provider.	Where any upgraded AV is installed, compliance to be achieved with this clause. Confirmation of any inbuilt amplification system proposed to the refurbished buildings to be confirmed in due course. Any existing hearing augmentation systems installed shall be investigated within design detail documentation.
Tactile indicators Clause D4D9 (1)	For a building required to be accessible, tactile ground surface indicators must be provided to warn people who are blind or have a vision impairment that they are approaching— a) a stairway, other than a fire-isolated stairway; and b) a ramp other than a fire-isolated ramp, step ramp, kerb ramp or swimming pool ramp; and c) in the absence of a suitable barrier— i. an overhead obstruction less than 2 m above floor level, other than a doorway; and ii. an accessway meeting a vehicular way adjacent to any pedestrian entrance to a building, excluding a	Further details of tactile indicators to be submitted with detailed design documentation in accordance with this clause.

BCA CLAUSE	STATUTORY REQUIREMENT	ASSESSMENT
	pedestrian entrance serving an area referred to in D4D5, if there is no kerb or kerb ramp at that point, except for areas exempted by D4D5.	
Tactile indicators Clause D4D9 (2)	Tactile ground surface indicators required by (1) must comply with sections 1 and 2 of AS/NZS 1428.4.1.	The proposal is capable of achieving compliance with this clause.
Ramps Clause D4D12	On an accessway— a) a series of connected ramps must not have a combined vertical rise of more than 3.6 m; and b) a landing for a step ramp must not overlap a landing for another step ramp or ramp.	The building is capable of achieving compliance with this clause.
Glazing on accessways Clause D4D13	On an accessway, where there is no chair rail, handrail or transom, all frameless or fully glazed doors, sidelights and any glazing capable of being mistaken for a doorway or opening, must be clearly marked in accordance with AS 1428.1.	Further details of glazing decals to be submitted with detailed design documentation in accordance with this clause.
Passenger lifts Clause E3D7 & E3D8	Lifts to be designed and installed in accordance with E3D7 and E3D8 of the BCA and AS1735.12.	Not applicable. There are no lifts proposed within the subject buildings.
Accessible sanitary facilities Clause F4D5	In a building required to be accessible— a) accessible unisex sanitary compartments must be provided in accessible parts of the building in accordance with F4D6; and b) accessible unisex showers must be provided in accordance with F4D7; and c) an accessible unisex sanitary compartment must contain a closet pan, washbasin, shelf or bench top and adequate means of disposal of sanitary products; and d) the circulation spaces, fixtures and fittings of all accessible sanitary facilities provided in accordance with F4D6 and F4D7 must comply with the requirements of AS 1428.1; and e) an accessible unisex sanitary facility must be located so that it can be entered without crossing an area reserved for one sex only; and f) where two or more of each type of accessible unisex sanitary facility are provided, the number of left and right-handed mirror image facilities must be provided as evenly as possible; and g) where male sanitary facilities are provided at a separate location to female sanitary facilities, accessible unisex sanitary facilities are only required at one of those locations; and	Bldg A has been provided with upgraded boys and girls facilities including ambulant facilities within each and a student accessible facility. Bldg V is primarily for staff use and an accessible adult/staff wc has been provided although it is not located at the bank of all-gender facilities available closer to the staff lounge. This will be addressed by a Performance Solution. Bldg I will have the existing girls and boys toilets upgraded and a new combined accessible shower and WC for student use. The Change rooms being a common area will be afforded with access for all students and their abilities. A new ACC SHR/WC will be available for staff located next to the first aid room.

BCA CLAUSE	STATUTORY REQUIREMENT	ASSESSMENT
	h) an accessible unisex sanitary compartment or an accessible unisex shower need not be provided on a storey or level that is not required by D4D4(f) to be provided with a passenger lift or ramp complying with AS 1428.1.	
Accessible unisex sanitary compartments Clause F4D6	Where required by F4D5(a), the minimum number of accessible unisex sanitary compartments for each class of building is as follows: Class 9 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.	Adequate accessible unisex wc's have been provided for staff and students throughout the subject buildings. As the accessible staff wc within the administration building is not located at the bank of other facilities this is required to be justified by a Performance Solution to satisfied item b) in this clause.
Accessible unisex showers Clause F4D7	Where required by F4D5(b), the minimum number of accessible unisex showers for each class of building is as follows: Class 9 Where F4D4 requires 1 or more showers, not less than 1 for every 10 showers or part thereof.	Six (6) showers have been provided for students within the multi-purpose hall and therefore one (1) accessible shower has been shown adjacent to these amenities and complies. An accessible shower and wc has also been shown for the staff within the multi-purpose hall and additional accessible shower and wc within the staff administration building.
Ambulant sanitary facilities Clause F4D5 (c)	At each bank of toilets where there is one or more toilets in addition to an accessible unisex sanitary compartment at that bank of toilets, not less than one sanitary compartment suitable for a person with an ambulant disability for use by males and one sanitary compartment suitable for a person with an ambulant disability for use by females, must be provided. Ambulant sanitary facilities shall be designed in accordance with Clause 16 of AS1428.1.	Satisfactory ambulant facilities are provided within refurbished amenities. Where All-Gender facilities as proposed within the administration staff building, this will be addressed by a Performance Solution.
Accessible adult change facilities Clause F4D12 (1)	One unisex accessible adult change facility must be provided in an accessible part of a— a) Class 6 building that is a shopping centre having a design occupancy of not less than 3,500 people, calculated on the basis of the floor area and containing a minimum of 2 sole-occupancy units; and b) Class 9b sports venue or the like that— i. has a design occupancy of not less than 35,000 spectators; or ii. contains a swimming pool that has a perimeter of not less than 70 m and that is required by D4D2 to be accessible; and c) museum, art gallery or the like having a design occupancy of not less than 1,500 patrons; and	There is currently no Accessible adult change facilities provided nor are any required under the BCA.

BCA CLAUSE	STATUTORY REQUIREMENT	ASSESSMENT
	d) theatre or the like having a design occupancy of not less than 1,500 patrons; and e) passenger use area of an airport terminal building within an airport that accepts domestic and/or international flights that are public transport services as defined in the Disability Standards for Accessible Public Transport 2002.	
Accessible adult change facilities Clause F4D12 (2)	Accessible adult change facilities required by Clause F4D12 (1)— a) must be constructed in accordance with Specification 27; and b) cannot be combined with another sanitary compartment.	Not applicable.

4. SUMMARY

Based upon the information contained in the above tables, it can determine that the proposed is capable of achieving compliance with the relevant accessibility provisions of the BCA, subject to the comments provided above being incorporated into the design.

Compliance can be achieved either by meeting the deemed-to-satisfy requirements of the BCA, as are principally contained within Part D4 Access for People with a Disability and Parts F4D5, F4D6, F4D7 Accessible Sanitary Facilities, or via a performance-based approach.

We trust that the above information is sufficient for the consent authority in assessing the merit of the architectural design from a planning perspective.

This statement should not be construed as relieving any other parties of their legislative or contractual obligations.

Kind regards,

Report by



Rachael Telling
Associate | Accessibility
For DC Partnership Pty Ltd

Verified By



John La Scala
Principal | Accessibility
For DC Partnership Pty Ltd

APPENDIX 1 – DOCUMENTATION PROVIDED FOR ASSESSMENT

This accessibility assessment was based upon the architectural documentation prepared by Edmiston Jones namely—

DRAWING NUMBER	REV	DRAWING TITLE	DATE
DA 00	-	COVER PAGE	9/12/2025
DA01	-	SITE PLAN	9/12/2025
DA02	-	PART SITE PLAN 1	9/12/2025
DA03	-	PART SITE PLAN 2	9/12/2025
DA04	-	BLOCK A - FLOOR PLAN & ROOF PLAN	9/12/2025
DA05	-	BLOCK A - ELEVATIONS & SECTIONS	9/12/2025
DA06	-	BLOCK V – FLOOR PLAN, ELEVATION	11/12/2025
DA07	-	BLOCK H - FLOOR PLAN, ROOF PLAN, ELEVATIONS & SECTIONS	9/12/2025
DA08	-	BLOCK I - FLOOR PLAN & ROOF PLAN	9/12/2025
DA09	-	BLOCK I - ELEVATIONS	9/12/2025
DA10	-	BLOCK I - SECTIONS	9/12/2025

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