

ACCESS PLANNING REVIEW REPORT

PROJECT NAME: Wee Waa High School
PROJECT STAGE: Concept Design – SSDA Stage
PROJECT NO: GDL-210339
PREPARED FOR: School Infrastructure NSW
DATE: 29.10.2021

www.groupdla.com.au



TABLE OF CONTENTS

1.0	EXECUTIVE SUMMARY	4
2.0	INTRODUCTION	9
2.1	Report Purpose	9
2.2	Reporting Team	9
2.3	Legislative Requirements	9
2.4	Additional Design Guidelines	12
2.5	Access Strategy Objectives	12
2.6	Performance Solutions - Performance Based Design Brief (PBDB) – BCA 2019 – Amendment One	13
2.7	Limitations	13
3.0	PROJECT PARTICULARS	14
3.1	Building Site & Background	14
3.2	Building Description	15
3.3	Areas Required to be accessible under the BCA/Access Code	16
3.4	Documentation Assessed	16
4.0	ACCESSIBILITY ASSESSMENT	17
4.1	Access to Buildings	17
4.2	Accessible Car-Parking	17
4.3	Building Entrances	18
4.4	Emergency Egress	20
4.5	Access Within Buildings - Paths of Travel & Circulation Requirements	20
4.6	Paths of Travel – Accessible Floor Surface Requirements	21
4.7	Paths of Travel – Accessible Door Requirements	22
4.8	Exemptions – Areas not Required to be Accessible	22
4.9	Passenger Lifts	23
4.10	Walkways	24
4.11	Ramps	24
4.12	Stairs	25
4.13	Accessible Sanitary Facilities & Showers	26
4.14	Ambulant Sanitary Facilities	28
4.15	Wheelchair Seating Spaces	29
4.16	Signage	29
4.17	Hearing Augmentation	30
4.18	Glazing on Accessways	30
4.20	Landscape & External Sports Facilities	31
Appendix A:		33
Drawing Markups		33

REVISION HISTORY


Revision	Date	Details	Authorised	
			Name/Position	Signature
A	23.09.2021	Concept Design Review for SSDA Stage	Prepared: Elisa Moechtar Manager, Access Consultancy ACAA No. 198	--
B	29.10.2021	Concept Design Review for SSDA Stage – text update	Prepared: Elisa Moechtar Manager, Access Consultancy ACAA No. 198	--
C	29.10.2021	Concept Design Review for SSDA Stage – text update	Prepared: Elisa Moechtar Manager, Access Consultancy ACAA No. 198	

Table 1 – Revision History

© Group DLA. All rights reserved

Group DLA has prepared this document for the sole use of the Client and for a specific purpose, each as expressly stated in the document. No other party should rely on this document without the prior written consent of Group DLA. Group DLA undertakes no duty, nor accepts any responsibility, to any third party who may rely upon or use this document. This document has been prepared based on the Client's description of its requirements and Group DLA's experience, having regard to assumptions that Group DLA can reasonably be expected to make in accordance with sound professional principles. Group DLA may also have relied upon information provided by the Client and other third parties to prepare this document, some of which may not have been verified. Subject to the above conditions, this document may be transmitted, reproduced or disseminated only in its entirety.

1.0 EXECUTIVE SUMMARY

This Concept Design Review Access Report has been prepared for the proposed development known as Wee Waa High School located at 105 – 107 Mitchell Street, Wee Waa NSW 2388.

Students and staff were evacuated from the current Wee Waa High School site due to ongoing health issues in late 2020. Students are currently colocated within the town's primary school in an overcrowded site. A Ministerial announcement made on 3 June 2021 committed to the construction of a new High School at Wee Waa on existing Department of Education owned land and adjacent Crown land as an urgent priority. The site is located on Mitchell Street/Kamliaroi Highway and is legally described as Lot 1 DP577294, Lot 2 DP550633 and Lots 124-125 DP757125.

The report accompanies a State Significant Development Application which seeks consent for the construction of a new high school that will service 200 students with potential to grow to a total capacity of 300 students, subject to further funding and service need, and 61 staff in a two-storey building, an Indigenous Cultural Centre, sporting fields and associated civil and utilities works. For a detailed project description refer to the EIS prepared by Ethos Urban.

The Report provides an accessibility compliance assessment of design documentation against the Disability (Access to Premises – Buildings) Standards 2010 (Premises Standards), the access provisions of Volume 1 of the Building Code of Australia 2019 – Amendment One (BCA), referenced Australian Standards (AS) with consideration of the objectives of the Disability Discrimination Act 1992 (DDA) to ensure reasonable access provisions for people with disability.

The information submitted at this stage of the design is not considered to be detailed to the extent where the development of a full Access report is possible and therefore this report is preliminary only for planning purposes.

Further development and refinement of detailed design requirements, such as internal fit-out design, and details of stairs, walkways/ramps, lifts, sanitary facilities and other access facilities and features will occur during design development and be included within future construction documentation and assessed prior to Crown Certificate/Building Approval Stage.

No.	Item	Access Issue or DtS Non-Compliance	Suggested Resolution	Ref. Clause	BCA Performance Requirement
1.	External pathway width	External pathway to and through Alternate entry gate on Mitchell Street (near pedestrian crossing) to Building A appears to have 1500mm min. clear width, which is not sufficient for wheelchair turning and passing.	Increase pathway to 1800mm min. clear width to allow two wheelchair users to pass in opposite direction and wheelchair turning at 20M max. intervals	BCA D3.2	DP1, DP2
2.	Accessible Car-parking	No accessible car-parking space is currently provided within on-site carpark	Illustrate 1 x designated accessible car-parking space to meet above access requirements, to be located as close as possible to adjacent buildings and connected by an accessible pedestrian pathway linkage.	BCA D3.5	DP8

No.	Item	Access Issue or DtS Non-Compliance	Suggested Resolution	Ref. Clause	BCA Performance Requirement
3.	External access to raised building entrances	When approaching the raised ground floor level building entrances, there are extended travel distances to alternate access ramps from stairs at: <ul style="list-style-type: none"> • Building A –between the Assembly Court and the Library (approx. 135 metres) • Building C – between the School Hall and the covered Sports/games courts on western side (approx. 100 metres) 	<i>Consider providing additional 2 x external ramps at Building A and at Building C in accordance with AS1428.1:2009 to meet the intent of BCA D3.2 and the objectives of the DDA – DDA/Advisory recommendation</i> <i>Refer to Appendix A for recommended locations</i>	DDA and intent of BCA D3.2	DP1, DP2
4.	Single lift Provision	Building B lift is located more than recommended 50metres travel distance) to stairway in Building D (approx. 80 metres) and as 1 x lift serves entire upper level 1 area, there is no contingency in event of potential lift breakdown and/o maintenance which creates access barrier for people unable to use stairs.	<i>Consideration for an additional lift facility to be located in Building D, near stairway – DDA/Advisory recommendation. Refer to Appendix A for recommended locations</i>	DDA and intent of BCA D3.2	DP1, EP3.4
5.	Building A Entry Stairs	Proposed wrap around corner stairs at Building A main and alternate entry approaches is a DDA access and safety issue due to stair angle and non-functional relationship of future stair handrails to treads especially for people with ambulant disability	<i>Consider design review for AS1428.1:2009 compliance to meet the intent and the objectives of the DDA – DDA/Advisory recommendation</i>	DDA and intent of BCA D3.2	DP1, DP2
6.	Building C & D Amphitheatre Stairs	If future required handrails are not provided on both sides of both stairs adjacent to the proposed tiered seating/outdoor learning area 2 (anticipated to enable ease of side access) stairs will not comply with AS1428.1.	A potential performance solution could be provided subject review of future stair/bleacher/handrail design detailing for feasibility and Stakeholder concurrence/endorsement of approach.	BCA D3.3	DP1, DP2
7.	Stair geometry and set-backs from landings	Most stairs appear to have no or limited recess/set-back area at base and top	Design review for DTS compliance at design	BCA D3.3	DP1, DP2

No.	Item	Access Issue or DtS Non-Compliance	Suggested Resolution	Ref. Clause	BCA Performance Requirement
		landing areas to allow for provision of future required handrails, outside of transverse paths of travel	development stage will be required.		
8.	Accessible Sanitary Facilities	Building C, School Hall ground level AWC does not appear to include required accessible shower and does not appear to have adequate width currently	Design review for DTS compliance at design development stage will be required.	BCA F2.4	FP2.1
9.	Ambulant Sanitary Facilities	Some Building areas do not appear to have made spatial provision for required ambulant facilities and some toilets do not have sufficient clear area for or required 900 x 900 circulation clear of door swings on path of travel to ambulant cubicles	Design review for DTS compliance at design development stage will be required	BCA F2.4	FP2.1
10.	Walkway edge protection at top of bleachers/fixed seating	Exposed raised walkway edges at top of bleachers/tiered seating (building A, C, D) will require walkway edge protection strategy to be developed for compliance, safety and to help direct people to stairs	Provide raised kerb or fixed seating at top of bleachers/tiered seating – NOTE: We do not recommend warning TGSIs be used due to potential confusion with TGSi use at stairs. NOTE: where no bleachers we assume that balustrades will be used as safety barrier to meet separate BCA D2.15 requirements (even though less than 1000mm height) for safety by design	BCA D3.3	DP1, DP2

Table 2 – DtS Non-Compliances

Note:

- The above non-compliances are not a full list of all access non-compliances for the building. The Report as a whole, and the associated Markup Drawings (Appendix A), need to be reviewed by the design team to obtain an understanding of all accessibility issues to be addressed during the next design development and detailing stage.

In order to confirm the design complies with the accessibility provisions of the BCA and DDA Premises Standards, the following items listed in Table 3 below are required to be clarified, submitted, illustrated, etc, during the next design development and detailing stage:

No.	Item	Comment	BCA Clause
A	Landscape Details /Civil design documentation	To achieve required circulation/gradients/crossfalls and confirm ground/pavement details for external accessible pathways and accessible car-parking in accordance with AS1428.1:2009 and AS2890.6:2009.	D3.2, D3.1
B	Floor Surfaces	During design development, details to be provided of the required traversable surfaces and slip resistance rating of all ground/floor surfaces to required accessible areas using a Wet Pendulum Method compliant with AS4586 and Standards Australia Handbooks HB197 & 198.	D3.3
C	Ramp, Walkway & Stair Details	<p>1:20 or 1:50 details of proposed ramps, walkways & stairs are required for further assessment. Including the design intent/approach for required ramp and stair setbacks and handrails/access features and the exposed walkway edge protection strategy at the top of bleachers/tiered seating.</p> <p>The details are to include compliant dimensioning of all relevant components, i.e. gradients, lengths, unobstructed widths between handrails on both sides, landings (1200mm minimum if no turning), turning bays (1540 x 2070 minimum), handrails (diameter of min 30-50 mm clearances, etc.) kerb-rails/edge protection, steps (riser and goings, etc).</p>	D3.3
D	Sanitary Facilities Wet Area Details & Sanitary Fixtures Schedules	<p>1:20 or 1:50 plans, elevations/details of the proposed and required sanitary facilities (accessible WC/shower & ambulant toilets) will be required for further assessment with the Sanitary FF & E Schedule.</p> <p>The details are to include compliant dimensioning of all circulation area requirements, set outs of sanitary fixtures etc to comply with AS1428.1:2009.</p> <p>Additional BCA Consultant input/advice is needed in relation to sanitary facilities min. toilet numbers vs. occupancy under Part F2.3.</p> <p>Additional design information/advice is required in regard to designation of/between Staff and Student facilities to meet BCA Part F2.3.</p>	F2.4
E	Door Details/Hardware Schedule	<p>To achieve AS1428.1:2009 compliance strategy for all required accessible internal and external doorways, including:</p> <ul style="list-style-type: none"> • Door clearances and circulation areas • Door hardware and controls to meet Clause 13.5.3 • Door contrast - 30% minimum luminance contrast between the door leaf or frame and the adjacent wall, for a minimum width of 50mm 	D3.2, D3.1, D3.3

No.	Item	Comment	BCA Clause
F	Hearing Augmentation System/s	Further details of any areas where inbuilt amplification is proposed (not solely for emergency warning) – within new works/building areas will be required for assessment as the design progresses to ensure hearing augmentation provisions to assist people with hearing impairment.	D3.7
G	Signage Strategy	Signage Schedule to be provided during design development, compliant with AS1428.1, CI 8 & BCA E3.6 & Specification D3.6.	D3.6
H	Passenger Lift Details & Confirmation on any specific Lift management in use plans for school context	Detailed lift plans, elevations, lift type & specification for the proposed passenger lift/s 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 etc to comply with BCA E3.6 & AS1735.12.	E3.6
I	BCA D3.4 Exempt Areas	Formal advice & documentation on any areas seeking BCA D3.4 exemption (subject to Crown Certifying Authority approval) is to be provided for assessment as the design progresses.	D3.4

Table 3 – Request for Further Information to be confirmed during DD stage prior to Building Approval

2.0 INTRODUCTION

2.1 Report Purpose

The purpose of this Report is to assess the compliance of the proposed development known as Wee Waa High School located at 105 – 107 Mitchell Street, Wee Waa NSW 2388 against the access requirements of the Disability (Access to Premises – Buildings) Standards 2010 (Premises Standards), the access provisions of Volume 1 of the Building Code of Australia 2019 – Amendment One (BCA), referenced Australian Standards (AS) with consideration of the objectives of the Disability Discrimination Act 1992 (DDA) to ensure reasonable access provisions for people with disability.

The Report has been prepared at Concept Design Stage to accompany a State Significant Development Application and assist the design/management team document the access provisions and requirements of the proposed development with a compliance strategy to ensure that the design is capable of compliance with the above access regulations.

The Report is preliminary based on assessment of the documentation prepared by SHAC Architects dated 04.08.2021, as listed in Section 3.4 – Documentation Assessed and the 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: Elisa Moehtar, ACAA Accredited Access Consultant (No. 198) from Group DLA Access.

2.3 Legislative Requirements

The applicable legislation governing the design of buildings is the Environmental Planning and Assessment Act 1979.

The assessment has considered the following legislation and referenced access standards:

- Disability Discrimination Act 1992 (DDA);
- Disability Access to Premises Standards 2010 (Premises Standards), including Access Code;
- Building Code of Australia 2019 – Amendment One (BCA) – Part D3, Part E3.6, F2.4, and
- Applicable Australian Standards: AS1428.1-2009, AS1428.4.1-2009, AS2890.6-2009, AS1735.12-1999,

Note:

At this concept design stage, the assessment has considered the intent however does not include a detailed review of the requirements of the Australian Standards.

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	Disability (Access to Premises – Buildings) Standards 2010 - DAPS	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	Disability Discrimination Act (DDA)	All new works, including the open space/external facilities is subject to the Disability Discrimination Act 1992 (DDA) which applies nationally and is a complaints-based legislation administered by the Australian Human Rights Commission (AHRC). The client has the right and responsibility to make a risk assessment on the implementation of the extent of access compliance and consider this within the building and landscape design, in addition to any operational overlays and/or School management procedures, reasonable adjustment policies.
--------------------------	-------------------------------------	--

Table 4 – 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 D3, E3.6 and F2.4. 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/Access Code, the over-arching DDA legislation will still apply, and it cannot be guaranteed that a successful complaint cannot be lodged. Any DDA/Advisory/Best practice options noted within the report may assist in minimising the risk of a complaint being made under the DDA, however these comments are not exhaustive, and we cannot confirm or certify for DDA compliance because this can only be determined by the Courts.
- 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:

- 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 and shown in Figure 1:

- 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.

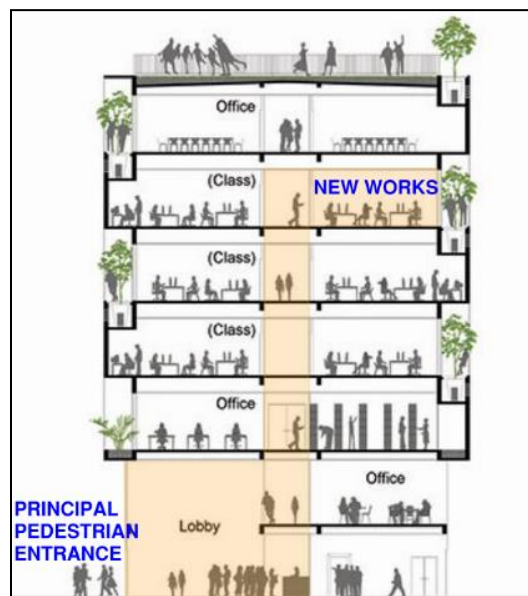


Figure 1 – Sample Schematic of “Affected Part”

- **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 AS1428.1 adopted the increased circulation requirements of AS1428.2-1992 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 (TGSIs) to assist the orientation of people with vision impairment.
- **AS 2890.6-2009** is referenced by the BCA and contains mandatory access requirements for accessible car parking (off-street) for people with disability.
- **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.

2.4 Additional Design Guidelines

The Report may also consider other relevant access design guidelines and/or advisory Standards (that do not form part of a formal BCA/Access Code 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
- Government Architect of NSW “Better Placed” – An integrated design policy for the built environment of New South Wales
- Australian Human Rights Commission (AHRC) Advisory Note on Streetscape, Public Outdoor Areas, Fixtures, Fittings and Furniture – 8 February 2013

Note:

- This document may provide 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.
- **AS1428.2-1992** Design for Access & Mobility: Enhanced & Additional requirements – Buildings & Facilities

Note:

- Part 2: AS1428.2-1992 is a non-mandatory Standard (unless for a BCA H2 – Public Transport Building) that provides enhanced and best-practice design requirements for elements that are not covered in AS1428.1 such as fittings, fixtures, furniture and the like.
Compliance with AS1428.2 for these matters/areas is recognised as good/best practice and should be incorporated where achievable. For any internal building elements that are not covered by mandatory, referenced Standards, the DDA legislation will still apply and it cannot be guaranteed that a complaint cannot be lodged.

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

- Principle 1: Equitable Use
- Principle 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 Access Strategy Objectives

This report is a key element in developing an Access Strategy for the development to ensure reasonable access for people with disability within the built environment. The Access Strategy will consider anticipated user groups that may include Staff/Personnel, Students, and Visitors/Public.

Within these user groups, the Access Strategy will attempt to deliver equality, independence, and functionality to people with disability inclusive of:

- People with mobility impairments
- People with sensory impairment
- People with intellectual disabilities and cognitive impairment
- People with dexterity impairments

2.6 Performance Solutions - Performance Based Design Brief (PBDB) – BCA 2019 – Amendment One

Further development of the BCA has introduced provisions to allow performance-based buildings. This has allowed for innovation and variation from the prescriptive deemed-to-satisfy requirements of the BCA, whilst maintaining the principle levels of health, safety, and amenity of building occupants.

Performance Solutions (also known as Alternative Solutions) are generally adopted when a nominated deemed-to-satisfy provision appears inappropriate for the design, or when a proposed design varies from the prescriptive requirements of the BCA. A Performance Solution provides a tailored solution to meet the intended objective of the Performance Requirements. Subsequently, a performance solution supported by Accessibility analysis can determine whether a proposed design that varies from prescriptive requirements, will satisfactorily meet the access performance provisions of the BCA.

Utilising the performance provisions may result in more economical and/or appropriate access building solutions to suit the specific nature/function/use requirements of the building particularly when dealing with existing buildings, however, may also require additional operational overlay and/or on-going maintenance. It is for these reasons that relevant parties, such as the building owner, building end user, insurance companies, proposed tenants, etc., are aware of this decision-making process and are kept informed of any additional requirements needed to maintain the level of access and safety.

BCA 2019 - Amendment One: introduces a new requirement under Part A2.2 in the development of access performance-based solutions to satisfy BCA Performance Requirements. Namely a performance-based design brief (PBDB) is required to be prepared in consultation with relevant stakeholders.

The performance-based design brief (PBDB) – means the process and the associated report that defines the scope of work for the performance-based analysis, the technical basis for analysis, and the criteria for the acceptance of any relevant Performance Solutions as agreed by the stakeholders. The PBDB can be prepared as a separate document and/or as part of the access performance solution report that is prepared by the Access Consultant and then assessed and approved by the Certifying Authority for the development.

2.7 Limitations

- The Report assessment is limited to a desktop review of the documentation provided at the date of this report and as referenced within the “Documentation Assessed” section of the Report.
- 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 Disability Access to Premises Standards 2010 (Premises Standards), including the Access Code and access provisions of the BCA.
- It is noted that the design assessment has been made of the general access planning provisions to the extent necessary for Concept Design Stage and the Report cannot be considered sufficient for the building approval. Further assessment of detailed architectural documentation is required following further design development and detailing as outline within this Report to ensure access compliance prior to the Building Approval Stage (assumed to be under Section 6.28 Crown Certification).
- The EFSG has not been taken into consideration as part of this Assessment.
- 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.

3.0 PROJECT PARTICULARS

3.1 Building Site & Background

The Wee Waa High School development site is located at located at 105 – 107 Mitchell Street, Wee Waa NSW 2388.

Students and staff were evacuated from the current Wee Waa High School site due to ongoing health issues in late 2020. Students are currently collocated within the town's primary school in an overcrowded site. A Ministerial announcement made on 3 June 2021 committed to the construction of a new High School at Wee Waa on existing Department of Education owned land and adjacent Crown land as an urgent priority. The site is located on Mitchell Street/Kamliaroi Highway and is legally described as Lot 1 DP577294, Lot 2 DP550633 and Lots 124-125 DP757125.

This report accompanies a State Significant Development Application which seeks consent for the construction of a new high school that will service 200 students with potential to grow to a total capacity of 300 students, subject to further funding and service need, and 61 staff in a two-storey building, an Indigenous Cultural Centre, sporting fields and associated civil and utilities works. For a detailed project description refer to the EIS prepared by Ethos Urban.



Figure 2 – Proposed Site Plan (top) in relation to the Existing site (bottom right)



Figure 3 – Proposed Ground Floor Plan

3.2 Building Description

The following comments are made in relation to the subject building development:

- Under the BCA, the development consists of the following primary building classifications (as confirmed by the project BCA Consultant):

Building (or Part)	Building Class	Building Main Use
Building A	Class 5 (Offices) and 9b (School)	Staff Office/Administration Area & Library
Building B	Class 5 (Offices) and 9b (School)	Special Learning Unit, General Learning, Health/PE Learning Unit, Vet & Food Textiles Learning Unit
Building C	Class 5 (Offices) and 9b (School)	Sports & Performance/School Hall
Building D	Class 5 (Offices) and 9b (School)	Wood & Metal technology, Workshop, Science Labs
Building E	Class 9 b (School)	Indigenous Cultural Centre
Building E & F	Class 9 b (School)	Agricultural and Environment Centre & Workshops

Table 4 – Building Class (or Part)

3.3 Areas Required to be accessible under the BCA/Access Code

In accordance with the provisions of Clause D3.1 of the BCA, the following areas of the buildings are required to be accessible:

BCA Building Area	Description
Class 5 (Offices)	To and within all areas normally used by the occupants.
Class 9b	To and within all areas normally used by the occupants at a school.

Table 5 – Areas Required to be Accessible under BCA/Access Code

3.4 Documentation Assessed

This Report is based on the following documentation prepared by SHAC Architects:

Drawing No.	Title	Revision	Date
CD0000	Cover	H	04/08/2021
CD1101	Proposed Site Plan	H	04/08/2021
CD1102	Proposed Site Plan – Detailed	H	04/08/2021
CD2105	Ground Floor Furniture Layout Plan	G	04/08/2021
CD2106	First Floor Furniture Layout Plan	G	04/08/2021
CD2107	Agriculture / Environmental Centre Plans	G	04/08/2021
CD2401	Roof Plan	G	04/08/2021
CD3101	Elevations	G	04/08/2021
CD3103	Agriculture / Environment Centre Elevations	G	04/08/2021
CD3201	Sections	G	04/08/2021
CD3202	Agriculture / Environment Centre Section	G	04/08/2021

Table 6 – Documentation Assessed

4.0 ACCESSIBILITY ASSESSMENT

4.1 Access to Buildings

Reference – BCA D3.2 & AS1428.1

Requirements:

To meet the BCA/Access Code, an accessway (ie, continuous accessible path of travel, compliant with AS1428.1) is required to provide pedestrian access to the proposed building for people with disability 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 new works common-use stairs, ramps and walkways providing pedestrian access to the building are to be compliant with BCA D3.3 & AS1428.1.

Comment:

At this stage, the design includes 3 x pedestrian entry gates at the site boundary as follows:

- Main entry gates on George Street (near kiss and ride vehicular drop off area and bus stop) that connects via new proposed pathway to Building A.
- Secondary entry gate on George St (north-east corner near on-site car-parking area) that connects via new proposed pathway to Building E.
- Alternate entry gate on Mitchell Street (near pedestrian crossing) that connects via new proposed pathway to Building A

The above proposed pathways are required accessways to the base level of the building development and will need to be developed and detailed as continuous accessible paths of travel to comply with AS1428.1:2009.

As Buildings A, B, C, D are all raised above ground level, various ramps and stairs are required in order to access the raised ground level – please refer to following Sections below for further assessment.

During design development:

- The new proposed external and internal pathway leading to and through the Alternate entry gate on Mitchell Street (near pedestrian crossing) to Building A to be increased to 1800mm min. clear width to allow two wheelchair users to pass in opposite direction and wheelchair turning at 20M max. intervals - BCA D3.2
- The detailed design features for all required accessways will need to be developed to meet the above requirements, with further information and details required for assessment.

Refer to drawing mark-ups for additional comments/information – see Appendix A

Based on the information provided, the design is capable of compliance subject to final review of detailed design prior to Building Approval / Crown Certification stage.

4.2 Accessible Car-Parking

Reference – BCA Table D3.5 & AS2890.6

Requirement:

To meet the BCA/Access Code, accessible carparking spaces for people with disability are to be provided for any new proposed carpark associated with the building in accordance with AS2890.6 and BCA Table D3.5 as follows:

Class of building to which the carpark or carparking area is associated	Number of accessible carparking spaces required
Class 5 (Offices) and Class 9b (School)	1 space for every 100 carparking spaces or part thereof.

The accessible carparking spaces are required to be located on a firm, level surface in compliance with AS2890.6, CI 2.3, including:

- Minimum dimensions of 2400mm W x 5400mm L plus an adjacent shared area of 2400mm W x 5400mm L, compliant with AS2890.6;
- Vertical clearance of 2500mm minimum height over accessible carparking space and shared area with 2200mm minimum height over vehicle aisle leading to accessible car space from FFL, compliant with AS2890.6; and
- Accessible carparking spaces to be located and connected via a continuous accessible path of travel, compliant with AS1428.1 to relevant lifts and/or building entry point to minimise travel distances in compliance with BCA D3.2.

Comments:

At this stage, the design includes:

- There is One (1) on-site carparking area in north east corner with twenty (20) proposed car spaces that will be required to provide at least one designated accessible car-parking space to comply with the above access requirements.
- Two (2) security gates at site boundary leading to proposed on-site internal roadways as follows:
 - George Street site boundary leading to on-site car-parking area
 - Mitchell Street site boundary near Covered Sports Court leading to shuttle bus shed
- One (1) service gate at Charles Street site boundary leading to proposed perimeter service/maintenance track (North west corner near Livestock paddocks) – Note: this area/track is assumed as Part D3.4 exempt and not required to be accessible

During design development:

- Provide at least 1 x designated accessible car-parking space to meet above access requirements, to be located as close as possible to adjacent buildings and connected by an accessible pedestrian pathway linkage.
- The detailed features for the accessible carparking space/s will need to be developed to meet the above requirements, with further information and details required for assessment.
- Ongoing consideration to be made for pedestrian safety in relation to on-site internal roadways with suitable measures to address and minimise potential pedestrian/vehicular conflicts.

Refer to drawing mark-ups for additional comments/information – see Appendix A

Based on the information provided, the design is capable of compliance subject to final review of detailed design prior to Building Approval / Crown Certification stage.

4.3 Building Entrances

Reference – BCA D3.1, 3.2 & AS1428.1

Requirement:

To meet the BCA/Access Code requirements for accessible entry into the building for people with disability, access is required:

- Through the principal pedestrian entrance to a building (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 D3.4); 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 D3.4.
- When an accessible pedestrian entrance* (as defined by Figure D3.2) has multiple doorways:
 - At least 1 to be accessible, if not more than 3 doorways provided; and
 - At least 50% to be accessible, if more than 3 doorways provided.

Note:

- It is preferred all doorways be accessible for inclusion and to avoid need for designation.
- The accessible entrances are to have clear and adequate 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.
- All required accessible entrance doors and associated door controls need to comply with AS1428.1.

Comments:

At this stage, the design includes:

- Buildings A, B, C, D, E and F that are all raised approx. 900mm above ground level as part of the proposed flood mitigation strategy.
- As a result, external access to raised building entrances of all Building A – F building will be via external stairs and ramps or walkways that will be developed to meet AS1428.1 requirements (refer to Sections 4.10 and 4.11)
- The principal pedestrian entrance to the school is located at Building A, with external access via 2 x stairs and 1 x ramp. The ramp is located in reasonable proximity to the stairs, however as it may not be readily identifiable on approach directional signage will be required at the stairs to direct people to the alternate ramp location.

The following access issues are noted in relation to external access to the building entrances:

- Building A – there is extended travel distance to/from the Assembly Court and base of tiered outdoor learning area 1 from the Library and when approaching from Building E to the accessible entry ramp at Building B (approx. 135 metres) – an additional external ramp is strongly recommended to meet the intent of the DDA.
- Building C – there is extended travel distance to/from the School Hall and the covered Sports/games courts and base of tiered outdoor learning area 2 to the accessible entry ramp at Building D (approx. 100 metres) – an additional external ramp is strongly recommended to meet the intent of the DDA.
- Note: It is preferred that users can commence and finish in the same/similar location for equity and inclusion.

During design development:

- The detailed design features of the external entrance doors to all areas within Buildings A, B, C, D, E, F that are required to be accessible will need to be developed to meet the above requirements, with further information and details required for assessment in the next design stage.
- *Consider providing additional 2 x external ramps at Building A and at Building C in accordance with AS1428.1:2009 to meet the intent of BCA D3.2 and the objectives of the DDA – Refer to Section DDA/Advisory recommendation.*
- *Consider providing ramps with overhead weather protection, where possible to assist people with disability and people with access needs, in particular when ramps are provided adjacent to any stairs with overhead weather protection – DDA/Advisory recommendation.*

Refer to drawing mark-ups for additional comments/information – see Appendix A.

Based on the information provided, the design is capable of compliance subject to final review of detailed design prior to Building Approval / Crown Certification stage.

4.4 Emergency Egress

Reference – BCA D2.17, D3.3 & AS1428.1

Requirement:

To meet BCA D2.17, required fire-isolated stair/ramp exits, (serving required accessible building areas) are required to include access features suitable for people with disability (ie, ambulant and sensory) including:

- At least one continuous, consistent height handrail compliant with AS1428.1 Cl 12.
- To achieve a consistent height handrail (ie, 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 is needed.
- All fire-isolated egress stairs are to provide 30% min. luminance contrasting step nosing that is slip-resistant in compliance with AS1428.1 to satisfy BCA D3.3 and BCA Table D2.14.

Comment:

At this stage, the design includes no fire isolated stairs or fire-isolated ramps, however the new stairs and ramps that provides access to and within the building will be required for egress (refer to separate Group DLA BCA Consultant's Report). As the stairs and ramps are used for communication purposes, they are required to comply with AS1428.1:2009– please refer to Sections 4.11 and 4.12 below for further details.

DDA/Advisory Notes:

- *There is a gap in current access legislation with regard to independent accessible egress for people with disability (particularly for people with mobility issues or access needs that are unable to use stairs) as there is no mandatory requirement within the BCA or Premises Standards for accessible egress for people with disability to be in accordance with AS1428.1. However, to meet DDA intent and objectives, all users, including people with disability should be provided with a safe means of evacuation/egress from premises to a place of safety.*
- *Consideration of an accessible egress strategy, with a documented group emergency evacuation plan and fire wardens, as well as Personal Emergency Evacuation Plans – PEEPs to assist people with disability for any Staff/employees and students that identify with a disability is recommended.*

4.5 Access Within Buildings - Paths of Travel & Circulation Requirements

Reference – BCA D3.1, D3.3 & AS1428.1

Requirement:

To meet the BCA/Access Code and provide access for people with disability to and within all common-use areas of the building required under BCA Table D3.1, accessways are to be provided throughout all parts of a building required to be accessible. An accessway or continuous accessible paths of travel cannot include a step, stairway, turnstile, revolving door, escalator, moving walk or other impediment.

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

- 1000mm minimum clear width path of travel (for linear direction), compliant with AS1428.1, with increased clear width areas required for doorway circulation, turning, etc;
- 1500mm minimum clear width path of travel for curved walkways and landings;
- Circulation spaces (1500mm x 1500mm) compliant with AS1428.1 where users are required to turn through 90°;
- 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.
- All required turning/passing spaces and landings require a suitably level surface, not steeper than 1:40 gradient.
- At least 2000mm minimum clear height FFL (1980mm height permitted at doorways) is required for all accessways.
- Any accessways adjacent to areas with less than 2000mm clear height eg. underside of stairs are to be suitably enclosed by a physical barrier, handrail and kerbrail or have warning TGSi installed to AS1428.4.1 for safety.

Comment:

The above access requirements are applicable for Buildings A, B, C, D, E and F (unless the room/area is Part D3.4 exempt).

At this stage, following our review of available information, the plans indicate that the design is capable of achieving compliance with the above access requirements.

During design development, further information and details will be required for assessment to confirm AS1428.1:2009 compliance at detailed design stage.

Please refer to drawing mark-ups (Appendix A) for additional comments/information on some areas where increased corridor circulation is needed for wheelchair turning spaces.

This is achievable and will occur prior to Building Approval/Certification stage.

4.6 Paths of Travel – Accessible Floor Surface Requirements

Reference – BCA D3.1, D3.3 & AS1428.1

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 (ie. 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 ie. 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 D2.14, 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 Condition	
	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 eg. Toilets	--	P3
Transitional Areas eg. Entry Lobby	P2	P3 (Preferred)
Dry Areas eg. Internal room	P1	--
Stair tread and landings	P3	P4
Stair nosing and landing edge strip	P3	P4

Comment:

During design development, further information, and details for the building and for the landscape design paths of travel will be required for assessment to confirm AS1428.1:2009 compliance at detailed design stage.

This is achievable and will occur prior to Building Approval/Certification stage.

4.7 Paths of Travel – Accessible Door Requirements

Reference – BCA D3.1, D3.3 & AS1428.1

Requirement:

To meet the BCA/Access Code and provide access for people with disability to and within all common-use areas of the building required under BCA Table D3.1, 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 Cl.13;
- For double leaf doors, at least one active leaf door is required to achieve 850mm minimum clear opening width.
- Provide 30% min. luminance contrast between doorway openings and adjacent surfaces, compliant with Cl. 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
- Doors to have lightweight operational force (20N) or may need power-operation with accessible controls.

Comment:

At this stage, following our review of available information, the plans indicate that the design is capable of achieving compliance with the above access requirements.

During design development, further information and details will be required for assessment to confirm AS1428.1:2009 compliance at detailed design stage.

Please refer to drawing mark-ups (Appendix A) for additional comments/information on some areas where increased corridor and/or door circulation has been noted for review of doorway circulation for independent wheelchair use.

This is achievable and will occur prior to Building Approval/Certification stage.

4.8 Exemptions – Areas not Required to be Accessible

Reference – BCA D3.4

Requirement:

The BCA/Access Code makes allowance for specific areas to be exempt from access for people with disability in compliance with AS1428.1 under BCA D3.4:

- An area where access would be inappropriate because of the particular purpose for which the area is used. (Restricted use service rooms: sub-station, fire-control room, switch rooms, waste room)
- An area that would pose a health or safety risk for people with a disability. (Plant rooms, service risers, pump, comms rooms, cooling towers, etc)
- Any path of travel providing access only to an area exempted by (a) or (b). (Restricted use service areas (ie, cleaners' rooms, heavy equipment storage, operational freezers and chillers, sub-stations, service rooms/cupboards; loading dock, waste/crate management areas and the like).

Comment:

General storerooms used for day to day storage are to comply with AS1428.1 door clearances and circulation.

Further clarification will be required to document any areas seeking BCA D3.4 exemption (subject to stakeholders' and Certifying Authority's approval) to meet the performance requirements of the BCA as the design progresses.

At this stage, following our review of available information, the plans indicate that the design is capable of achieving compliance with the above access requirements. During design development, further information and details will be required for assessment to confirm AS1428.1:2009 compliance at detailed design stage.

This is achievable and will occur prior to Building Approval/Certification stage.

4.9 Passenger Lifts**Reference – BCA E3.6 & D3.3 & AS1735.12****Requirement:**

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

- Every passenger lift is to comply with BCA Table E3.6a and include accessible features as per Table E3.6b 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).
- Lift car dimensions to have 1400mm W x1600mm L minimum dimensions for more than 12m travel distance.
- All passenger lifts to include detailed access features for people with disability including lift car dimensions, door clearance, lift call and controls, fixtures and fittings and auditory and visual indicators in compliance with AS1735.12 to satisfy BCA E3.6.

Comment:

At this stage, the design includes:

- One (1) passenger lift located at Building B to provide a continuous accessible path of travel from raised ground to all upper level 1 areas of Building A, B, C, D
- The Building B lift is located within reasonable proximity (no more than 50metres travel distance) to the three (3) stairways in building A, B, C, however, is further away from stairway in Building D (approx. 80 metres) which may be an access barrier for people with access needs unable to use stairs when moving between Building D ground workshops and level 1 laboratory areas.

During design development:

- Consideration for providing 1 x additional lift facility to be located in Building D, near stairway to meet the intent of the DDA and for lift contingency/maintenance events – DDA/Advisory recommendation.
- The detailed lift access features will need to be developed to meet the above requirements, with further information and details required for assessment.

Refer to drawing mark-ups for additional comments/information – see Appendix A

Based on the information provided, the design is capable of compliance subject to final review of detailed design prior to Building Approval / Crown Certification stage.

4.10 Walkways

Reference – BCA D3.3 & AS1428.1

Requirement:

The BCA/Access Code has walkway requirements to ensure access for people with disability that include:

- All walkways to comply with AS 1428.1, CI 10.
- Walkways to have a 1:20 maximum gradient, landings at maximum 15m intervals with landing dimensions in compliance with AS1428.1.
- Walkways are to include minimal cross-fall and level transitions between slip resistant, traversable surfaces, level landing circulation areas and edge protection on any exposed sides (ie, raised kerb, kerb and handrail, low wall) in compliance with AS1428.1 to satisfy BCA D3.3.
- Exposed walkway edges are required to have suitable edge protection to meet AS1428.1 Clause 10.2 – particular attention to be made to the use of physical raised design elements/cues at the top of bleachers/tiered seating (rather than TGSIs) to assist direct people with vision impairment to safe areas to descend ie. adjacent stairs and avoid TGSIs overuse and/or potential confusion with required TGSIs at the top of stairs.

Comment:

At this stage, following our review of available information, the plans indicate that the design for the required external accessways from the site boundary is capable of achieving compliance with the above access requirements. During design development, further information and details will be required for assessment to confirm AS1428.1:2009 compliance at detailed design stage. Please refer to Section 4.20 Landscape for further information.

This is achievable and will occur prior to Building Approval/Certification stage.

4.11 Ramps

Reference – BCA D3.3 & 3.11 & AS1428.1

Requirement:

The BCA/Access Code has ramp requirements to ensure access for people with disability that include:

- All ramps are to be compliant with AS 1428.1, CI 10 (excluding ramps leading solely to BCA D3.4 exempt areas);
- 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, ramps require:

- 1:14 maximum gradient, landings at 9m maximum intervals and landing length dimensions (exclusive of handrails) to suit direction/turn required (ie. 1200mm min; 1500mm 90-degree turn, 1540mm 180-degree turn);
- Suitable recess from the site boundary (900mm) and from other paths of travel (400mm) to allow required handrail extensions to not encroach over the traverse path of travel, compliant with AS1428.1; and
- Clear width dimensions to allow for 1000mm minimum required access and/or egress path with suitably sized landings in addition to space for required handrails on both sides, compliant with AS1428.1.
- Continuous handrails and kerb-rails on both sides in compliance with AS1428.1 to satisfy BCA D3.3.
- Tactile ground surface indicators (TGSIs) provided at top and base landing areas in compliance with AS 1428.4.1.
- Step ramps to have 1:10 maximum gradient, 190mm maximum height and be compliant with CI 10.6.
- Threshold ramps to have 1:8 maximum gradient, 35mm maximum height and be compliant with CI 10.5.

Comment:

At this stage, the design includes proposed access ramps as follows:

- Building A – eastern side, from main pedestrian entry approach to raised ground level (external uncovered)
- Building B – northern side, from Assembly Court to raised ground level (external uncovered)
- Building D – western side, from Outdoor space and Sports facilities to raised ground level (external uncovered)
- Building C – School Hall access ramp to raised Stage at ground level (internal building)
- It is assumed that external ramps (and stairs) will also be required for external entry access to Building E and F due to the proposed raised ground floor level (900mm height), however this is not currently shown on plan.

In addition to the above, as noted in Section 4.3 due to the extended travel distance in some areas between stairs and ramps, provision of an additional 2 x external ramps at Building A and at Building C are recommended to be included in the current SSDA documentation for equity and inclusion to meet the objectives of the DDA.

During design development:

- The detailed ramp access features will need to be developed to meet the above requirements, with further information and details required for assessment at next design stage.

Refer to drawing mark-ups for additional comments/information – see Appendix A

Based on the information provided, the design is capable of compliance subject to final review of detailed design prior to Building Approval / Crown Certification stage.

4.12 Stairs

Reference – BCA D3.3 & AS1428.1

Requirement:

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

- All communication and non-fire-isolated stairways must comply with AS1428.1, CI 11.
- Stairs are to be recessed from the site boundary (900mm) and from other paths of travel (400mm at top and approx. 650 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.
- Handrail provision on both sides of stairs also applies to stairs adjacent to tiered seating steps/bleachers
- All stairs are to include access features including, closed risers with appropriate geometry, luminance contrasting step nosing that is slip-resistant in compliance with AS1428.1 to satisfy BCA D3.3.
- All stairs require tactile ground surface indicators (TGSIs) to be provided at top and base landing areas in compliance with AS 1428.4.1.

Comment:

At this stage, the design includes proposed stairways as follows:

- Building A – eastern side, from main and alternate pedestrian entry approach to raised ground level (external covered)
- Building A – western side, from Assembly Court to raised ground level (external uncovered)
- Building B – northern side, from Assembly Court raised ground level (external uncovered)

- Building C & D – western side, from Outdoor space and Sports facilities to raised ground level (external uncovered) – either side of proposed tiered seating/outdoor learning area
- Building D – western side, from Outdoor space and Sports facilities to raised ground level (external uncovered)
- Building C - School hall stairs to Stage (internal)
- Building A, B, C, D – Curved stairs from raised ground to upper level 1 (external covered)
- It is assumed that external stairs (and ramps) will also be required for external entry access to Building E and F due to the proposed raised ground floor level (900mm above ground level), however this is not currently shown.

The following potential access issues are noted in relation to the current design:

- Building A – the wrap around corner stairs at Building A main and alternate entry approaches is a DDA access and safety issue due to stair angle and non-functional relationship of future stair handrails to treads, especially for people with low vision and people with ambulant disability – design review is strongly recommended
- Building C & D – if future required handrails are not provided on both sides of both stairs adjacent to the proposed tiered seating/outdoor learning area 2, a potential performance solution will be required subject to feasibility following review of future design detailing.
- Most stairs appear to have no or limited recess/set-back area at base and top landing areas to allow for provision of future required handrails, outside of transverse paths of travel – design review/adjustment will be required for compliance.
- Building D – there appears to be tiered seating (that would not meet BCA Part D2.13 stair geometry) on eastern side facing Assembly Court with no adjacent stairs for access – further information needed on design intent and BCA Consultant input advice.

During design development:

- In addition to the above noted items, the detailed stair access features will need to be developed to meet the above access requirements, with further information and details required for assessment.

Refer to drawing mark-ups for additional comments/information – see Appendix A

Based on the information provided, the design is capable of compliance subject to final review of detailed design prior to Building Approval / Crown Certification stage.

4.13 Accessible Sanitary Facilities & Showers

Reference - BCA F2.4 & AS1428.1

Requirement:

The BCA/Access Code has 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, compliant with BCA Table D3.1 including:

BCA Table F2.4(a) Accessible Unisex Sanitary Compartments

Class of Building	Minimum Accessible Unisex Sanitary Compartments to be provided
Class 5 and 9b	Where F2.3 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.

- Generally, an accessible unisex toilet requires min. dimensions of 2350mm W x 2350mm L or 2000mm W x 2750mm L based on BCA 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 D3.3(f) to be provided with a passenger lift or ramp complying with AS 1428.1.
- All unisex accessible toilets and combined accessible toilets/showers to have spatial dimensions, layouts, fixtures and fittings in compliance with AS1428.1, CI 15 to satisfy BCA F2.4.

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 and size.

BCA Table F2.4(b) – Accessible Unisex Showers

Class of Building	Minimum Accessible Unisex Sanitary Compartments to be provided
Class 5 and 9b	Where F2.3 requires 1 or more showers, not less than 1 for every 10 showers or part thereof.

- Accessible unisex showers are to be provided in accordance with Table F2.4(b). If common use change facilities are provided (i.e., both toilets and showers) a separate combined accessible WC/shower adjacent to male and female change rooms is required, compliant with AS1428.1.

Comment:

At this stage, the design includes the following proposed accessible toilets as follows:

Building	Level	Location	Use	LH	RH	Comment
A	GL	Library	TBC	1		Bank 1 – BCA F2.4 required
A	GL	Administration	Staff		1	Bank 1 – BCA F2.4 required
A	L1	Amenity Block	Student		1	Bank 1 – BCA F2.4 required
A	L1	Amenity Block	Staff	1		Bank 2 – BCA F2.4 required
B	GL	Special Learning Unit	TBC		1	Bank 1 – further information required on this room as it includes additional laundry/features which may be separate EFSG request for Client review and approval
C	GL	School Hall	Student	1		Bank 1 – BCA F2.4 required Needs to include accessible shower
C	GL	Amenity Block	Student		1	Bank 1 – BCA F2.4 required
C	L1	Amenity Block	Student		1	Bank 1 – BCA F2.4 required
E	GL	Indigenous Cultural Centre	TBC	1		Bank 1 – BCA F2.4 required
Total No. AWC – 9				4	5	Unisex Accessible toilets (F2.4)

At this stage, following our review of available information, the plans indicate that the design is capable of achieving compliance with the above access requirements. During design development, further information and details will be required for assessment to confirm AS1428.1:2009 compliance at detailed design stage and for:

- the proposed use of some facilities to meet separate BCA Part F2.3 requirements for designated and separate staff and student facilities (nominated in red),
- any separate EFSG requirements eg. Building B – Special Learning Unit (nominated in red),, and
- ensuring provision of accessible shower within Building C Student accessible WC on ground level (nominated in red).

This is achievable and will occur prior to Building Approval/Certification stage.

4.14 Ambulant Sanitary Facilities

Reference - BCA F2.4 & AS1428.1

Requirement:

The BCA/Access Code has requirements for the provision of ambulant sanitary facilities to ensure access for people with disability within areas of a building required to be accessible compliant with BCA F2.4, Clause (c), as detailed below:

- At each bank of toilets where there are 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, CI 16 must be provided for use by males and females.
- All ambulant toilets to have spatial dimensions, layouts, fixtures and fittings in compliance with AS1428.1, CI 16 to satisfy BCA F2.4

Note:

- Minimum room dimensions for ambulant sanitary facilities are between finished walls and do not include allowance for construction tolerance.

Comment:

At this stage, the design includes the following proposed and **required (nominated in red)** ambulant toilets:

Building	Level	Location	Use	Male	Female	Unisex	Comment
A	GL	Administration	Staff	1	1		Bank 1 – BCA F2.4 required, to be provided
C	GL	School Hall	Student	1	1		Bank 1 – BCA F2.4 required, to be provided
C	GL	School Hall	Staff			1	Bank 2 – BCA Consultant input advice required on F2.3 separate gender designation
C	GL	Amenity Block	Student	1	1		Bank 1 – BCA F2.4 required
A	L1	Amenity Block	Student	1	1		Bank 1 – BCA F2.4 required
A	L1	Amenity Block	Staff	1?	1?	1	Bank 2 – BCA Consultant input advice required on F2.3 separate gender designation, currently indicated as 1 x unisex ambulant
C	L1	Amenity Block	Student	1	1		Bank 1 – BCA F2.4 required
E	GL	Indigenous Cultural Centre	TBC	1	1		Bank 1 – BCA F2.4 required
	Total No. Ambulant Male/Female/Unisex – TBC			4 (6 or 7)	4 (6 or 7)	1 (TBC)	

At this stage, following our review of available information, the plans indicate that the design is capable of achieving compliance with the above access requirements. During design development, further information and details will be required for assessment to confirm AS1428.1:2009 compliance at detailed design stage and for:

- Compliant 900 x 900 min. clear circulation between door swings on the path of travel to required ambulant cubicles in Building C Student Amenity Blocks on ground and level 1 – currently insufficient space shown
- Provision of male and female ambulant cubicles in Building A and C, ground level facilities as indicated above in red – currently not shown

- If staff ambulant facilities can be unisex or need to be gender designated - BCA Consultant confirmation on min. required numbers of staff toilet facilities to meet separate BCA F2.3 requirements

Refer to drawing mark-ups for additional comments/information – see Appendix A

This is achievable and will occur prior to Building Approval/Certification stage.

4.15 Wheelchair Seating Spaces

Reference – BCA D3.9, Table D3.9 & AS1428.1

Requirement:

In addition to providing access to and within all areas, normally used by the occupants compliant with BCA Table D3.1, the BCA/Access Code requires the provision of wheelchair seating/accessible spaces to ensure access for people with disability where fixed seating is provided in Class 9b assembly buildings compliant with Table D3.9, as follows:

Table D3.9 – Wheelchair seating spaces in Class 9b Assembly Buildings

Number of Fixed Seats in a Room or Space	Number of Wheelchair Seating Spaces	Grouping and Location
Up to 150	3 spaces	1 single space; and 1 group of 2 spaces.
151 to 800	3 spaces; plus 1 additional space for each additional 50 seats or part thereof in excess of 150 seats	Not less than 1 single space; and Not less than 1 group of 2 spaces; and Not more than 5 spaces in any other group.

Comment:

At this stage, given the anticipated flexible Sports/Performance use of the School Hall it is assumed that only loose chairs which can be removed and stored are proposed for the Hall, as such it is presumed that designated wheelchair seating spaces will not be required.

During design development:

- If fixed seating is proposed, wheelchair seating spaces will be required, compliant with AS1428.1, CI 18 to satisfy BCA D3.9 and Table D3.9. Details are to be provided for assessment.

4.16 Signage

Reference – BCA D3.6, Specification D3.6 & D3.5 & AS1428.1

Requirement:

The BCA/Access Code has 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 D3.6 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
 - Rooms and space with a hearing augmentation system; and
 - Door required by E4.5 to be provided with an exit sign and state “Exit” and “Level” and either:

- (aa) The floor level number; or
 - (bb) A floor level descriptor; or
 - (cc) A combination of (aa) and (bb).
- Accessible carparking compliant with BCA D3.5, Table D3.5 and AS2890.6.
- There are additional detailed BCA/Access Code 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.

Comment:

The statutory signage strategy (required identification and directional/way-finding signage) will be developed and assessed as the design progresses to confirm AS1428.1:2009 compliance at detailed design stage in order to satisfy BCA D3.6.

4.17 Hearing Augmentation

Reference – BCA D3.7

Requirement:

The BCA/Access Code has 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:

- (i) 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 compliance with BCA D3.7.
- 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).

Comment:

- Given the proposed use of the building, it is anticipated that an inbuilt amplification system will be installed that will trigger the above requirements for the provision of hearing augmentation to multiple public interface areas such as the School Hall and Library areas as well as School Classroom, Seminar/training/meeting areas etc.
- It should be noted that the requirements will also apply to AV systems such as school start/finish and period bells if they are also capable of operating as an inbuilt amplification system for making announcements.

During design development, further information and details will be required for assessment to satisfy the above BCA D3.7 and AS1428.5 requirements.

4.18 Glazing on Accessways

Reference – BCA D3.12 & AS1428.1

Requirement:

The BCA/Access Code has requirements for the provision of visual indicators 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 to ensure safe access for people with disability.

All glazing is to comply with AS1428.1-2009, Cl 6.6.

Comment:

There are numerous proposed fixed glazed panels and glazed doors that may require horizontal visual indicators for compliance and to improve access and safety for building users.

At this stage, following our review of available information, the plans indicate that the design is capable of achieving compliance with the above access requirements. During design development, further information and details will be required for assessment to confirm AS1428.1:2009 compliance at detailed design stage.

This is achievable and will occur prior to Building Approval/Certification stage.

4.20 Landscape & External Sports Facilities**Reference – DDA & AS1428.1****Recommendations:**

As there is no BCA classification or access legislation that provides specific requirements for landscape and outdoor spaces (outside of the over-arching DDA legislation), building legislation principles for BCA Class 9b buildings have been considered to promote equitable, dignified, and independent access for people with disability through landscape and outdoor sports areas with consideration of Universal Design Principles.

Under the BCA, Class 9b buildings require access for people with disability to and within all areas normally used by the occupants and to wheelchair seating spaces provided in accordance with D3.9, however access need not be provided to every tier or platform within an auditorium.

A similar approach can be applied to ensure reasonable access for people with disability and/or access needs to outdoor landscape and Sports facility areas within the constraints of the natural environment of the site:

- Access should be provided to and within all external areas normally used by the occupants via an integrated pathway system to connect key zones, elements, and spaces for people to access and enjoy a range of experiences.
- The pathways should provide a continuous accessible path of travel, compliant with AS1428.1 as far as is possible within site and/or other constraints.
- Access provisions and features (eg. rest seating, weather protection/shade provision) should be provided to assist all users including people with disability within landscape areas so that people can stop, rest and stay within the landscape in accordance with AS1428.1 and AS1428.2 design guidance.
- Suitable access provisions should be developed for people with disability with regard to new pathways near on-site roadways for safety and to avoid pedestrian and vehicle conflicts, particularly any kerb-ramps, blended kerbs or flush roadway or cycleway/share-way crossing areas in accordance with AS1428.1 and AS1428.4.1.
- Any connecting kerb ramps or continuous access from vehicular drop off lay-back areas should enable access from roadway to footpath and safety for users, compliant with AS1428.1 and AS2890.6.
- An accessible path of travel from associated public transport pick-up and kiss and ride vehicle set-down points within the development site to building entrances should be provided, compliant with AS1428.1.

Assessment:

Further details of the proposed landscape design, including hardstand pedestrian pathway system to connect key outdoor areas of the school will be assessed during the next design stage. It is recommended that the above access recommendations are used during ongoing design development to maximise access, participation, and inclusion and to minimise risk of potential DDA complaints.

It should be noted that even where Open space and/or Sporting/Playing Field areas are proposed in grass/turf surfaces (not accessible) consideration of connecting pathways to dedicated viewing and/or partial engagement areas suitable for people with disability is highly recommended to meet the intent of the DDA.

Appendix A: Drawing Markups

- LEGEND**
- PROPOSED SCHOOL BUILDINGS
 - PROPOSED SPORTS FIELDS
 - PROPOSED GREEN SPACE / NATIVE GRASS MEADOW
 - PROPOSED ONSITE ROADWAYS
 - SMALL & MEDIUM AGRICULTURAL PLOTS
 - LARGE AGRICULTURAL PADDOCKS
 - PROPOSED DRAINAGE SWALE
 - PROPOSED ONSITE DRAINAGE DIRECTION
 - PROPOSED DETENTION POND
 - TREES TO BE REMOVED
 - EXISTING TREES ON SITE TO BE RETAINED
 - PROPOSED PLANTING

2. Provide at least 1 x accessible car-parking space with adjacent shared area to meet AS2890.6 connected by AS1428.1 accessible path of travel to buildings - BCA D3.5

1. Increase pathways to and from Mitchell Street alternate entry gate to 1800mm min. clear width to allow two wheelchair users to pass in opposite direction and wheelchair turning at 20M max. intervals - BCA D3.2

MITCHELL STREET / KAMILAROI HIGHWAY

CONSULTANTS

CONSULTANT AREA
Company Name
T 4927 5566

CONSULTANT AREA
Company Name
T 4927 5566

CONSULTANT AREA
Company Name
T 4927 5566

CONSULTANT AREA
Company Name
T 4927 5566

CONSULTANT AREA
Company Name
T 4927 5566

CONSULTANT AREA
Company Name
T 4927 5566

AMENDMENTS

No	Dr	Chk	Date	Comment
C	RT	JH	11.06.21	Draft - Work in Progress
D	RT	JH	16.06.21	Issue to Client - Early Contractor Involvement
E	RT	JH	22.06.21	Issue to Client - for Civil Input
F	RT	JH	08.07.21	Issue to Client - Early Contractor Involvement - Addendum 01
G	RT	JH	28.07.21	Consultant coordination - Traffic
H	RT	JH	04.08.21	90% (pending client approval)

No	Dr	Chk	Date	Comment

No	Dr	Chk	Date	Comment

NOTES

- Dimensions are in millimetres unless otherwise shown.
- Work to given dimensions. Do not scale from drawing.
- Check all dimensions on site prior to construction and fabrication.
- Bring any discrepancies to the attention of the proprietor & architect.

CLIENT NAME

School Infrastructure NSW



Education
School Infrastructure

PROJECT NAME AND ADDRESS

Wee Waa High School
105-107 Mitchell St, Wee Waa NSW 2388

DRAWN

APPROVED

STATUS

DRAWING TITLE

Proposed Site Plan - Detailed

PROJECT NO.

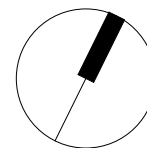
4474

DRAWING NO.

CD1102

REV.

H

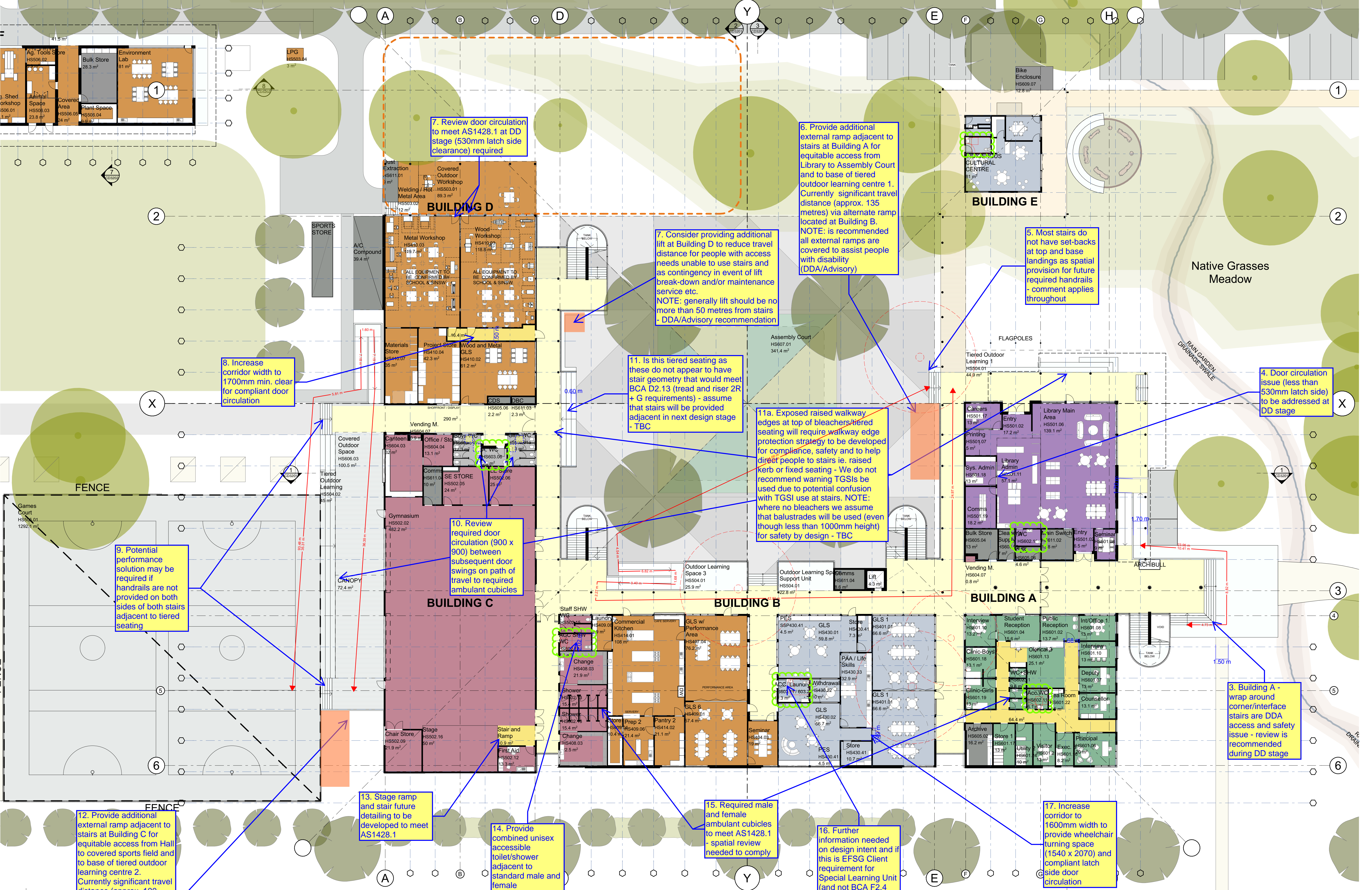


SHAC

T +61 2 4961 5888
F +61 2 4962 2577
E info@shac.com.au

224 Maitland Road
Bilginton NSW 2296
Australia

Nominated Architect
Justin Hamilton (6160)
ABN 32 131 584 846



1. Review door circulation to meet AS1428.1 at DD stage (530mm latch side clearance) required

6. Provide additional external ramp adjacent to stairs at Building A for equitable access from Library to Assembly Court and to base of tiered outdoor learning centre 1. Currently significant travel distance (approx. 135 metres) via alternate ramp located at Building B. NOTE: is recommended all external ramps are covered to assist people with disability (DDA/Advisory)

5. Most stairs do not have set-backs at top and base landings as spatial provision for future required handrails - comment applies throughout

4. Door circulation issue (less than 530mm latch side) to be addressed at DD stage

11a. Exposed raised walkway edges at top of bleachers/tiered seating will require walkway edge protection strategy to be developed for compliance, safety and to help direct people to stairs i.e. raised kerb or fixed seating - We do not recommend warning TGSIs be used due to potential confusion with TGSIs use at stairs. NOTE: where no bleachers we assume that balustrades will be used (even though less than 1000mm height) for safety by design - TBC

7. Consider providing additional lift at Building D to reduce travel distance for people with access needs unable to use stairs and as contingency in event of lift break-down and/or maintenance service etc. NOTE: generally lift should be no more than 50 metres from stairs - DDA/Advisory recommendation

11. Is this tiered seating as these do not appear to have stair geometry that would meet BCA D2.13 (tread and riser 2R + G requirements) - assume that stairs will be provided adjacent in next design stage - TBC

10. Review required door circulation (900 x 900) between subsequent door swings on path of travel to required ambulant cubicles

8. Increase corridor width to 1700mm min. clear for compliant door circulation

9. Potential performance solution may be required if handrails are not provided on both sides of both stairs adjacent to tiered seating

3. Building A - wrap around corner/interface stairs are DDA access and safety issue - review is recommended during DD stage

17. Increase corridor to 1600mm width to provide wheelchair turning space (1540 x 2070) and compliant latch side door circulation

15. Required male and female ambulant cubicles to meet AS1428.1 - spatial review needed to comply

14. Provide combined unisex accessible toilet/shower adjacent to standard male and female toilets/showers - increased clear room width to 2350mm min. needed

13. Stage ramp and stair future detailing to be developed to meet AS1428.1

12. Provide additional external ramp adjacent to stairs at Building C for equitable access from Hall to covered sports field and to base of tiered outdoor learning centre 2. Currently significant travel distance (approx. 100 metres) via alternate ramp located at Building D. NOTE: is recommended external ramp is covered as per. adjacent stairs to assist people with disability and for equity (DDA/Advisory)

AMENDMENTS									
No	Dr	Chk	Date	Comment	No	Dr	Chk	Date	Comment
A			25.06.21	Weekly Project Meeting					
B			28.05.21	Stakeholder Workshop	G	RT / HS / EF	JH	04.08.21	90% (pending client approval)
C			11.06.21	Draft - Work In Progress					
D	RT / HS / EF	JH	16.06.21	Issue to Client - Early Contractor Involvement					
E	RT / HS / EF	JH	22.06.21	Issue to Client - for Civil Input					
F	RT / HS / EF	JH	08.07.21	Issue to Client - Early Contractor Involvement - Addendum 01					

T +61 2 4961 5888	224 Maitland Road	Nominated Architect
F +61 2 4962 2577	Islington NSW 2296	Justin Hamilton (616)
E info@shac.com.au	Australia	ABN 32 131 584 846

