



Building Code of Australia 2019 Amendment 1

DDA ASSESSMENT REPORT

New Primary School at Gregory Hills 28 Wallarah Circuit, Gregory Hills NSW 2557

Prepared for: SINSW | Issue date: 5 October 22



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Authorisation

Revision	Comment / Reason for Issue	lssue Date	Prepared by	Reviewed by
06	Revised Report	05 Oct 22	Anigkafreen	Jul Ja-
	for SSDA Issue		Annika Green	Joel Lewis

Revision History

Revision	Comment / Reason for Issue	Issue Date	Prepared By
01	Draft Concept Report	31 May 22	Annika Green
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03	Revised Concept Report	02 Sep 22	Annika Green
04	Revised Schematic Report	16 Sep 22	Annika Green
05	DDA Report for SSDA Issue	29 Sep 22	Annika Green
06	Revised Report for SSDA Issue	05 Oct 22	Annika Green

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1 Executive Summary

MBC Group as the appointed DDA Consultant for the proposed development, have reviewed architectural design documents prepared by Bennett and Trimble (refer appendix A) for compliance with the National Construction Code - Building Code of Australia Volume One 2019 Amendment 1.

1.1 Design Details Required

The assessment of the design documentation has revealed that the following areas require further details to demonstrate compliance with the prescriptive provisions of the BCA – refer to Section 3.9 for further information.

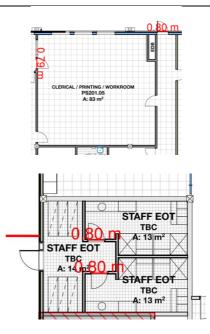
The documentation will need further detailing such as door hardware, construction specifications, services design and manufacturer's details as the design progresses towards Building Approval.

The application for Crown Works Certificate shall be assessed under the relevant provisions of the Environmental Planning & Assessment Act 1979 (As Amended) and the Environmental Planning & Assessment Regulation 2021.

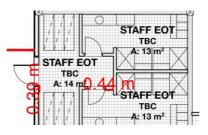
DTS Clause	Clause Description
D3.1,	<u>General Building Access Requirements –</u>
AS1428.1-	Buildings and parts of buildings must be accessible as required by
2009 Clauses	Table D3.1, except where exempted by D3.4 as follows
13.2 and 13.3	• Class 5 – to an within all areas normally used by the occupants
	 Class 6 – to an within all areas normally used by the occupants
	 Class 7b – to an within all areas normally used by the occupants
	 Class 9b schools and assembly buildings – to and within all areas
	normally used by the occupants
	The following commentary is provided:
	Block A and B
	 Doorways within Blocks A and B were typically noted as being
	scaled at 750mm – 800mm. As this building is required to be
	accessible, all doorways are required to be a minimum 850mm
	wide. Architect to note and ensure this detail is provided in the

next iteration of design.

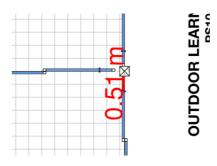
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 Inadequate latchside door circulation spaces were noted in a few locations to be less than 510mm (when door is swinging away from the user) and 530mm (when the door is swinging towards the user). Architect to note the below locations and ensure that all door circulation spaces comply with the relevant requirements of AS1428.1-2009



Architect to note that door hardware is to be a minimum 530mm out from any internal corner.



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D3.2

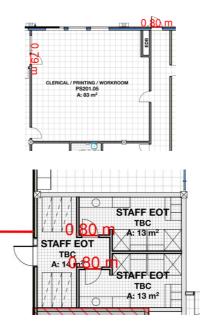
Access to Buildings

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 850mm in accordance with AS1428.1.

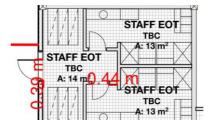
The following commentary is provided:

Block A and B

 Doorways within Blocks A and B were typically noted as being scaled at 750mm – 800mm. As this building is required to be accessible, all doorways are required to be a minimum 850mm wide. Architect to note and ensure this detail is provided in the next iteration of design.



 Inadequate latchside door circulation spaces were noted in a few locations to be less than 510mm (when door is swinging away from the user) and 530mm (when the door is swinging towards the user). Architect to note the below locations and ensure that all door circulation spaces comply with the relevant requirements of AS1428.1-2009

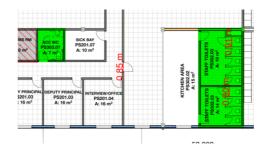




F2.(c)

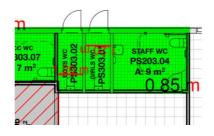
F2.4 Accessible Sanitary Facilities

It is noted that the accessible sanitary facility is not located adjacent to the bank of toilets on the Ground floor level of Block A. Architect to note and amend the plans accordingly.

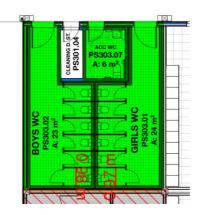


Ambulant Sanitary Facilities

Proposed ambulant sanitary facilities (PS303.02 and PS303.01) in Block C were dimensioned at 1.2m in width. Architect to note that ambulant sanitary facilities are required to be between 900-920mm between side walls. Architect to note and amend the plans accordingly.

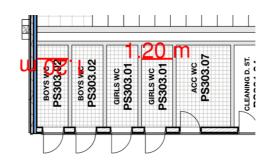


Additionally, the ambulant sanitary facilities in building B were typically dimensioned at 980mm between side walls in lieu of 900 – 920mm. Architect to note and amend the plans accordingly.



Architect to furthermore note that proposed ambulant sanitary facilities blocks within Block A were typically dimensioned at 1200mm in lieu of 900mm-920mm as per the requirements of AS1428.1-2009

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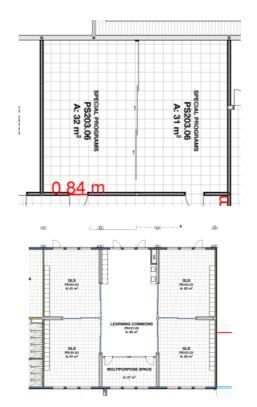


AS1428.1- Door Controls

2009 Clause 13.5

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Further details of the GLS sliding doors are required to be provided confirming that the 20N force will not be exceeded during operation



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2 Introduction

MBC Group have been engaged as the appointed DDA Consultant for the development subject of this report by SINSW. This report is based upon a desktop review of architectural details (as listed in Appendix A), presently SSDA Issue form, against the applicable provisions of the National Construction Code - Building Code of Australia Volume One 2019 Amendment 1.

2.1 Purpose

The purpose of this report is to assess the current design proposal against the Deemed-to-Satisfy (DtS) provisions of the BCA.

2.2 Methodology

The methodology applied in undertaking this assessment has included: -

- A desktop review of architectural plans, as listed in Appendix A
- Assessment of Sections D3, E3 and F2 (as applicable / relevant) of the BCA
- Discussions with the design development team to gain an understanding of the development proposed.

2.3 Limitations

This report does not include or imply any detailed assessment for design, compliance or upgrading for:

- the structural adequacy or design of the building;
- the inherent derived fire-resistance ratings of any proposed structural elements of the building (unless specifically referred to); and
- the design basis and/or operating capabilities of any proposed
 - o **electrical**
 - o **mechanical**
 - o hydraulic
 - fire protection services.

This report does not include, or imply compliance with:

- the National Construction Code Plumbing Code of Australia Volume 3
- The deemed to satisfy provisions of Sections C, D1, D2, E1, E2, E4, F1, F3, F4, G, H and J of BCA 2019 Amendment 1
- Demolition Standards not referred to by the BCA;
- Work Healthy and Safety Act 2011;
- An out of cycle change to the Building Code of Australia.
- Requirements of other Regulatory Authorities including, but not limited to, Telstra, Telecommunications Supply Authority, Water Supply Authority, Electricity Supply



Authority, Work Cover, Roads and Maritime Services (RMS), Roads and Transport Authority, Local Council, ARTC, Department of Planning and the like; and

• Conditions of Development Consent issued by the Local Consent Authority.

This report has been prepared by MBC Group in the capacity as the appointed DDA Consultant for the proposed development. This report is an assessment of the proposed development against the DtS provisions of the applicable BCA.

2.4 Current Legislation

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

Applicable Building Code of Australia (BCA)

The proposed development will be subject to compliance with the relevant requirements of the BCA as in force as at –

- (a) The date of the invitation for tenders to carry out the Crown Building Work; or
- (b) In the absence of tenders, the date on which the Crown Building Work commences

In this regard, it is assumed that the Crown Works Certificate, and the basis of this report is based upon the Deemed-to-Satisfy provisions of BCA 2019 Amendment 1.

Should an *out of cycle* change occur to the Building Code of Australia, then this report is required to be updated to reflect any applicable changes made and now required by the BCA.

3 Development Description & Assessment Information

3.1 Introduction

This DDA Report accompanies an Environmental Impact Statement (EIS) pursuant to Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act), in support of a State Significant Development Application (SSDA) for the construction and operation of a new primary school at Gregory Hills (SSD-41306367).

This report addresses the Secretary's Environmental Assessment Requirements (SEARs) issued for the project, notably :

SEARs Requirement	Response
4. Built Form and Urban Design	Addressed in the BCA
• Demonstrate how design quality will be achieved in	Design Compliance
accordance with the Education SEPP Design Quality	Report Ref. GHPS
Principles and the Design Guide for Schools, including:	SSDA_4.4_BCA Design
\circ how the proposed built form (layout, height,	Compliance Report
bulk, scale, separation, setbacks, interface and	October 2022 and DDA



	articulation) addresses and responds to the	Design Compliance
	context, site characteristics, streetscape and	Report
	existing and future character of the locality.	
0	how the building design will deliver a high-	
	quality development, including consideration of	
	façade design, articulation, roof design,	
	materials, finishes, colours, any signage,	
	integration of services, and the principles of	
	Crime Prevention through Environmental Design.	
Assess	s how the development complies with the relevant	
access	sibility requirements.	

3.2 Proposal

The proposal is for a new primary school at Gregory Hills that generally comprises the following:

- 44 General Learning Spaces.
- 4 Support Learning Spaces.
- Administration, staff hub, amenity and building service areas.
- Library, communal hall and canteen.
- Outside School Hours Care (OSHC) services.
- Sport courts, outdoor play space, a Covered Outdoor Learning Area (COLA) and site landscaping.
- Dedicated bicycle and scooter parking.
- Three (3) kiss and drop spaces for Supported Learning Students (SLS) located on Wallarah Circuit.
- On-site car parking.
- Signage.
- Footpath widening on Wallarah Circuit.



Figure 1: Site plan (source Bennett and Trimble)

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3.3 Site Description and Location

The site is located in Dharawal Country at 28 Wallarah Circuit, Gregory Hills NSW 2557, and is legally described as Lot 3257 DP1243285.

The site is located within the Camden Local Government Area and is within the Turner Road Precinct of the South-West Growth Centre.

The site has an area of approximately 2.926ha (by Deposited Plan). This will be reduced to 2.907ha under approved DA2022/742/1 once Long Reef Circuit has been widened. Topography is minimal with a fall from the south-east corner (RL116.5) to the north- west corner (RL113).

The site has three (3) street frontages:

- Wallarah Circuit (southern boundary)
- Gregory Hills Drive (northern boundary)
- Long Reef Circuit (eastern Boundary)

The site is primarily vacant land, with the exception of an existing group of trees in the southwest corner of the site that pre-date the subdivision and development of the precinct. There is also an existing electrical substation located on the south-eastern boundary.

There are easements of varying widths located to the northern boundary identified for drainage.







Figure 3: Site Aerial Map, (Source Bennett and Trimble)

3.4 Surrounding Development

To the north, east and south of the site is emerging and recently completed residential development.

To the east of the residential area fronting Long Reef Circuit are high voltage power lines within an easement which include pedestrian paths and cycleways.

To the west of the site, beyond Sykes Creek and Howard Park, is the Gregory Hills town centre. A pedestrian bridge links Wallarah Circuit with the town centre across Sykes Creek.



Figure 4: Surrounding Development (Nearmap)

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3.5 BCA Classification (Clause A3.2)

The proposed development shall contain the following classifications: -

- Class 5: being an office building or part (administration block)
- Class 6: being a retail building or part (canteen)
- Class 7b: being storage (ancillary storage to the hall building)
- Class 9b: being a public assembly building or the like (school, public hall and library)

3.6 Rise in Storeys (Clause C1.2)

The current design proposed under this report proposes three predominant buildings on the site known as Block A, B and C. Blocks A and B are connected via a link bridge on Levels 1 and 2, whilst Block C is separate from the administration and general learning spaces block.



Figure 5 – Second Floor Plan

This inherently results in two separate buildings on the site as shown below. Based on this configuration, the rise in storeys for this development is as follows:

- Hall / Library building rise in storeys of one (1)
- GLS / Admin Building rise in storeys of three (3)

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3.7 Effective Height (Clause A1.1)

The proposed development has been assessed to have the following *effective heights* (noting that Blocks A and B and separated from Block C):

- GLS / Admin Building Effective height of approx. 7.35m (measured from floor level Ground (116.1) to floor level 2 (123.45)
- Hall / Library Building Effective height of Om

3.8 General Accessibility Assessment and Requirements

The below summary table is a snapshot of the details required in order to achieve compliance with the Premises Standards, Building Code Australia and its prescriptive Australian Standards. This assessment is limited to identified issues ascertained from the current level of design detail. Further assessment will be required as the design progresses to demonstrate compliance.

Furthermore, as part of this holistic assessment, the recommendation of site management in use planning controls and contingency measures should be implored to further accommodate any persons with a disability requiring access throughout the site. This contingency plan should include but not be limited to the following measures:

- Internal and external wayfinding signage at high foot traffic areas and general circulation points
- Staff and student induction and onboarding programme facilitating on site walks to familiarise key accessible circulation paths between buildings on the site
- Visitor and parents meeting points for those who are unfamiliar with the school layout
- Interactive mapping on school website to indicate arrival and accessible entry points

Premis	Premises Standards		
Clause	Description	Commentary	
-	Access for People with Disabilities – Affected Part Upgrade	Noted – compliance readily achievable with further details to be provided as design progresses	
	Commonwealth Disability (Access to Premises - Buildings) Standards 2010 Clause 2.1 (a) and (b) of the Access to Premises Standard states that the following must comply with the Access Standards: • Any new building (an application after 1 May 2011)		



Clause Description Commentary D3.1 General Building Access Noted - compliance readily achievable with further details to be provided as design progresses. D3.1 General Buildings and parts of buildings must be accessible as required by Table D3.1, except where exempted by D3.4 as follows Noted - compliance readily achievable with further details to be provided to the staff end of trip facilities within the Ground Level of Block B. Class 5 - to an within all areas normally used by the occupants Class 7b - to an within all areas normally used by the occupants Class 9b schools and assembly buildings - to and within all areas normally used by the occupants D3.2 Access to Buildings An accessible path of travel must be provided to the building/s - Noted - compliance readily achievable with further details to be provided as design progresses. D3.2 Access to Buildings An accessible path of travel must be provided to the building/s - Noted - compliance readily achievable with further details to be provided as design progresses. D3.2 Access to Buildings An accessible path of travel must be provided to the building connected by a pedestrian link Noted - compliance readily achievable with further details to be provided as design progresses. D3.4 From any required accessible pathways between buildings, from the boundary and accessible, an accessway must be provided to be acce	Part D3	93 – Access for People with a Disability		
 Requirements - Buildings and parts of buildings must be accessible as required by Table D3.1, except where exempted by D3.4 as follows Class 5 - to an within all areas normally used by the occupants Class 6 - to an within all areas normally used by the occupants Class 7 b - to an within all areas normally used by the occupants Class 7 b - to an within all areas normally used by the occupants Class 9 b schools and assembly buildings - to and within all areas normally used by the occupants Class 9 b schools and assembly buildings - to and within all areas normally used by the occupants D3.2 Access to Buildings An accessible path of travel must be provided to the building/s - From mother accessible building connected by a pedestrian link From another accessible building required accessible carparking space on the allotment In a building required accessible, an accessway must be provided to the principal pedestrian entrance Not less than 50% of all 				
 by Table D3.1, except where exempted by D3.4 as follows Class 5 - to an within all areas normally used by the occupants Class 6 - to an within all areas normally used by the occupants Class 7b - to an within all areas normally used by the occupants Class 9b schools and assembly buildings - to and within all areas normally used by the occupants Class 9b schools and assembly buildings - to and within all areas normally used by the occupants Class 9b schools and assembly buildings - to and within all areas normally used by the occupants Class 7b - to an within all areas normally used by the occupants Class 9b schools and assembly buildings - to and within all areas normally used by the occupants D3.2 Access to Buildings An accessible path of travel must be provided to the building/s - From the main points of pedestrian entry at the allotment boundary From another accessible building connected by a pedestrian link From any required accessible, an accessway must be provided to the building required to be accessible, an accessway must be provided to the principal pedestrian entrance Not less than 50% of all 	D3.1	Requirements – Buildings and parts of buildings	further details to be provided as design	
 occupants Class 9b schools and assembly buildings - to and within all areas normally used by the occupants D3.2 Access to Buildings An accessible path of travel must be provided to the building/s - From the main points of pedestrian entry at the allotment boundary From another accessible building connected by a pedestrian link From any required accessible carparking space on the allotment In a building required to be accessible, an accessway must be provided to the principal pedestrian entrance Not less than 50% of all 		 by Table D3.1, except where exempted by D3.4 as follows Class 5 - to an within all areas normally used by the occupants Class 6 - to an within all areas normally used by the occupants Class 7b - to an within all 	provided to the staff end of trip facilities within the Ground Level of Block B. Currently the doorway configuration does not provide adequate latchside door clearance into the airlock or the EoT rooms. Plans are to be amended in the next	
 An accessible path of travel must be provided to the building/s - From the main points of pedestrian entry at the allotment boundary From another accessible building connected by a pedestrian link From any required accessible carparking space on the allotment In a building required to be accessible, an accessway must be provided to the principal pedestrian entrance Not less than 50% of all 		 occupants Class 9b schools and assembly buildings – to and within all areas normally 	STAFF EOT TEC A: 14 m C A: 14 m C A: 14 m C A: 13 m ² TBC TBC A: 13 m ² TBC TBC TBC A: 13 m ²	
 building/s - From the main points of pedestrian entry at the allotment boundary From another accessible building connected by a pedestrian link From any required accessible carparking space on the allotment In a building required to be accessible, an accessway must be provided to the principal pedestrian entrance Not less than 50% of all 	D3.2	An accessible path of travel	further details to be provided as design	
 pedestrian link From any required accessible carparking space on the allotment In a building required to be accessible, an accessway must be provided to the principal pedestrian entrance Not less than 50% of all 		 building/s - From the main points of pedestrian entry at the allotment boundary From another accessible 	buildings, from the main and secondary entry points from the boundary and accessways from the carpark are to be	
Not less than 50% of all The following commentary is provided:		 pedestrian link From any required accessible carparking space on the allotment In a building required to be accessible, an accessway must be provided to the principal pedestrian 		
Block A and B				



Part D	3 – Access for People with a Disa	bili	ity
Clause	Description		mmentary
cluuse	In a building with a floor area more than 500m ² , a pedestrian entrance which is not accessible must be located not more than 50m from an accessible entrance Where a doorway on an	•	Doorways within Blocks A and B were typically noted as being scaled at 750mm – 800mm. As this building is required to be accessible, all doorways are required to be a minimum 850mm wide. Architect to note and ensure this detail is provided in the next iteration of design.
	accessway has multiple leaves, (except an automatic opening door) one of those leaves must have a clear opening width of not less than 850mm in accordance with AS1428.1.		CLERICAL / PRINTING / WORKROOM
			STAFF EOT TBC A: 13m ² STAFF EOT TBC A: 13m ² TBC A: 13m ²
		•	Inadequate latchside door circulation spaces were noted in a few locations to be less than 510mm (when door is swinging away from the user) and 530mm (when the door is swinging towards the user). Architect to note the below locations and ensure that all door circulation spaces comply with the relevant requirements of AS1428.1- 2009
			STAFF EOT TBC A: 13 m ² STAFF EOT TBC A: 13 m ² STAFF EOT TBC A: 13 m ²



Part D	3 – Access for People with a Dis	ability
Clause	Description	Commentary
D3.3	 Parts of the Building Required to be Accessible Accessible paths of travel (pathways, ramps and lifts) are required – to and within all areas ordinarily used by the occupants. from any accessible carparking spaces to the lifts. 	Noted - compliance readily achievable with further details to be provided as design progresses. Note that the new lifts will be required to comply with the accessibility requirements stipulated under BCA Clause E3.6 and Table E3.6b and AS1735.12-1999 Further details of all internal / external walkways, stairs and ramps shall be provided for further review as the design progresses.



Part D	3 – Access for People with a Disa	ability
Clause	Description	Commentary
D3.4	 Exemptions The following areas are not required to be accessible – An area where access would be inappropriate because of the particular purpose for which the area is used An area that would pose a health or safety risk for people with a disability Any path of travel providing access only to an area exempted by (a) or (b). 	 Note – this includes the following areas: Bulk store Garden store Sports store PE store KLA store SP store Comms room Cleaners rooms / cupboards Water meters Canteen
D3.5	 Accessible Carparking In accordance with BCA Clause D3.5, accessible carparking spaces complying with the following is required to be provided. Class 5 / 9b - 1 space for every 100 carparking spaces 	Noted – compliance readily achievable with further details to be provided as design progresses. Architect to provide further details of the proposed accessible carspaces.



	3 – Access for People with a Disa	
Clause D3.6	Description	Commentary
	 Accessible buildings must have signage in accordance with Specification D3.6 and AS1428.1 as follows: Braille and tactile signage incorporating the international symbol of access or deafness to sanitary facilities and a space with hearing augmentation Signage incorporating the international symbol of deafness to room with hearing augmentation identifying the type, the area covered and location of receivers. Signage to accessible sanitary facilities identifying left or right handed Signage to ambulant accessible facility must be on the door Signage to all egress doors identifying the level of egress. Directional signage where a pedestrian entrance is not accessible Directional signage where sanitary facilities are not provided with an accessible facility 	 further details to be provided as design progresses. The following commentary is provided: All accessible and ambulant toilets shall have signage Hearing augmentation signage is required where in-built amplification is required / provided Exit signage to be provided at the egress door to the fire isolated stair Accessible car parking signage to be provided to the dedicated accessible car space Changing places signage to be provided where adult change facilities in accordance with F2.9 is provided Directional signage for accessible toilets may be required Signage schedules to be provided prior to the issuance of the CWC.



_	6 – Access for People with a Disa	aditity
Clause	Description	Commentary
	The detailed requirements for Braille and Tactile signage is contained within BCA Specification D3.6	
D3.7	Hearing Augmentation	Further information required
	A hearing augmentation system must be provided where an inbuilt amplification system, other than one used for emergency warning is installed – In a room in a Class 9b building;	Client to confirm if any inbuilt amplification systems are to be utilised. It is likely a hearing augmentation system will be required. Further details of the proposed coverage method is to be provided for further review prior to the issue of the Crown Works Certificate.
D3.8	Tactile Indicators	Capable of achieving compliance
	 For a building required to be accessible, tactile indicators must be installed to warn people who are blind or who have vision impairment that they are approaching A stairway, other than a fire isolated stairway An escalator A passenger conveyor or moving walkway A ramp, other than a fire isolated ramp, step ramp, kerb ramp or swimming pool ramp Overhead obstructions less than 2m that are not otherwise protected by a barrier An accessway meeting a vehicular way that is not otherwise protected by a barrier Tactile indicators shall be 	Further details of all stairs, ramps and overhead obstructions around the stairs are to be provided for further review prior to the issue of the Crown Works Certificate.
	installed to comply with AS1428.4.1 and achieve the	
	following minimum luminance	



Part D3	6 – Access for People with a Disa	ability
Clause	Description	Commentary
	contrast against the adjacent path of travel. Integrated units - 30% Discrete Units - 45% Composite Discrete Units - 60%	
		TGSIs are required on stairs, ramps and other barriers to indicate warning. Any TGSIs used on site shall have the luminous contrast value prescribed.
		The values shall be tested against the surrounding background.
		LRV values of TGSI and the adjacent materials shall be provided
D3.11	Ramps On an accessway: a. A series of connected ramps must not have a combined vertical rise of more than 3.6m; and b. A landing for a step ramp must not overlap a landing for another step ramp or ramp c. All ramps to have a slip resistant surface	Capable of complying Further details of all ramps proposed to provide access to the stage, access between buildings are to be provided for further review prior to the issue of the CWC.
	 AS1428.1(2009) Clause 10 Ramps The max gradient of a ramp exceeding 1900mm shall be 1:14 1:14 shall not be longer than 9m 	Note that threshold ramps are not permitted internally to the building and access to all sanitary facilities shall not have a threshold.
	• TGSIs are required at the top and bottom of the ramp	be provided for further review.



Dart D3	- Access for People with a Disa	ability
Clause	Description	Commentary
	• The ramp shall have handrails on both sides of the stair with 300mm handrail extensions	
	 Threshold ramps Max rise of 35mm Max length of 280mm Max gradient of 1:8 Be located within 20mm of the door leaf which it serves The edges of the threshold ramp shall be tapered or splayed at a minimum of 45 degrees where the ramp does not abut a wall 	
	 Step ramp Max rise of 190mm Length not greater than 1900m Gradient not steeper than 1:10 The edges of step ramp shall have a 45° splay where there is pedestrian cross-traffic. Otherwise, it shall be protected by a suitable barrier, such as – (i) a wall or suitable barrier with a minimum height of 450 mm; or (ii) where an open balustrade is provided a kerb or kerb rail shall be provided 	
	 Kerb Ramps Max rise of 190mm Length not greater than 1520mm Gradient not steeper than 1:8 	



Part D ²	3 – Access for People with a Disa	ability
Clause	Description	Commentary
D3.12	Glazing on Accessways	Compliance readily achievable where applicable.
	Where there is no chair rail, handrail or transom, all frameless or fully glazed doors, sidelights, including any glazing capable of being mistaken for a doorway or opening, shall be clearly marked for their full width with a solid and non- transparent contrasting line The contrasting line shall be not less than 75 mm wide and shall extend across the full width of the glazing panel. The lower edge of the contrasting line shall be located between 900 mm and 1000 mm above the plane of the finished floor level	Details of the visual indicator strip to be provided for further review prior to the issue of the Crown Works Certificate.
	Any contrasting line on the glazing shall provide a minimum of 30% luminance contrast when viewed against the floor surface or surfaces within 2 m of the glazing on the opposite side.	
E3.6	Lifts New lifts required to be accessible must comply with BCA E3.6 and relevant parts of AS1735.12. Stairway platform lifts cannot be used to serve a space in a building accommodating more than 100 persons or high traffic areas such as shopping centres or the like.	Capable of complying – further details of the proposed lift shafts are to be provided as the design develops towards issuance of the CWC.
	Have minimum dimensions of:	

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Part D3	– Access for People with a Disa	ability
Clause	Description	Commentary
	 Low Rise Platform Lifts – 1100mm by 1400mm Stairway Platform Lifts – 810mm by 1200mm Passenger lifts which travel <12m – 1100mm by 1400mm Passenger 	
	Landings	
	 Lift landings must have minimum dimensions of 2070mm x 1540mm to allow a 180° turn for wheelchairs Lift landing control buttons must be located a minimum of 500mm from any adjacent side wall Stairway platform lifts are to comply with the manufacturers specifications and allow sufficient space for a wheelchair to enter and exit 	
F2.4	the lift. Accessible Sanitary Facilities	Compliance achievable.
	 In a building required to be accessible: Accessible unisex sanitary compartments must be provided at every storey containing sanitary 	Note that separate facilities are required to be provided for use by staff and students as prescribed by the BCA. Further details of the proposed accessible sanitary facility layout is required to further
	 compartments per Table F2.4 An accessible unisex 	assess for compliance prior to the issue of the CWC.
	sanitary compartment must contain a closet pan, washbasin, shelf or bench top and adequate disposal of sanitary towels	It is noted that separate staff and student accessible sanitary facilities are provided in Block C as noted below. Ambulant sanitary facilities have been provided to the students sanitary blocks as noted below.
	• Circulation spaces, fixtures and fittings of all accessible	



ClauseDescriptionCommentarysanitary facilities must comply with AS1428.1An accessible unisex facility must be located so that it can be entered without crossing an area reserved for one sexImage facilities to be even where 2 or more accessible unisex facilities providedWhere male and female facilities are separate, a unisex facility is only required at one locationImage facilities to be providedAccessible unisex sanitary compartment or shower need not be provided on a storey that is not required to be providedAccessible sanitary facilities have been	Part D3	6 – Access for People with a Disa	ability
comply with AS1428.1An accessible unisex facility must be located so that it can be entered without crossing an area reserved for one sexLeft and right handed mirror image facilities to be even where 2 or more accessible unisex facilities providedWhere male and female facilities are separate, a unisex facility is only required at one locationAccessible unisex sanitary compartment or shower need not be provided on a storey that is not required to be providedAccessible unisex sanitary compartment or shower need not be provided to be provided			
Accessible facilities must meet the requirements of Section 15 of AS1428.1(2009)		Descriptionsanitary facilities must comply with AS1428.1An accessible unisex facility must be located so that it can be entered without crossing an area reserved for one sexLeft and right handed mirror image facilities to be even where 2 or more accessible 	Commentary Commentary Image: Commentary Image: Commentary Image: Commentary Commentary Commentar



Part D3	3 – Access for People with a Disa	ability
Clause	Description	Commentary
		Accessible bathrooms and ambulant bathrooms have been provided to Block B.
F2.4(c)	Ambulant Sanitary Facilities	Compliance achievable.
	At each bank of toilets where there is one or more toilets, in addition to an accessible unisex sanitary compartment provided at that bank, a sanitary compartment suitable for a person with an ambulant disability must also be provided for use by males and females. The ambulant facilities must comply with the requirements of Section 16 of AS1428.1-2009	Note that separate facilities are required to be provided for use by staff and students as prescribed by the BCA. Further details of the proposed ambulant sanitary facilities layout is required to further assess for compliance prior to the issue of the CWC. Proposed ambulant sanitary facilities (PS303.02 and PS303.01) in Block C were dimensioned at 1.2m in width. Architect to note that ambulant sanitary facilities are required to be between 900-920mm between side walls. Architect to note and amend the plans accordingly.
	 Section 16 of AS1428.1-2009 which in summary requires: 900mm-920mm between side walls Grabrails to both sides 720mm cubicle doors Clear 900mm x 900mm space in front of the pan &/or clearances around door swings 610mm to 6600 pan projection 	Additionally, the ambulant sanitary facilities in building B were typically dimensioned at 980mm between side walls in lieu of 900 –



Part D3	6 – Access for People with a Disa	ability
Clause	Description	Commentary
	• Toilet roll holder location and coat hook	920mm. Architect to note and amend the plans accordingly.
		BOYS WC PS303.02 A: 23 m ² A: 23 m ² A: 24 m ³ A: 24
		Architect to furthermore note that proposed ambulant sanitary facilities blocks within Block A were typically dimensioned at 1200mm in lieu of 900mm-920mm as per the requirements of AS1428.1-2009
		BOYS WE BOYS W
F2.9	Accessible Adult Change Facilities Where proposed, an accessible	Further information required – confirmation of whether the intent is to have a changing places facility in the building as shown below
	adult change facility shall comply with specification F2.9 of the BCA.	
	Changing places is a voluntary initiative in Australia that advocates for an accessible public toilet and change rooms for users with high support needs who require assistance	ADULT CHANGE HS102.06 LAUNDRY HS102.08 H: AMB WC HS102.07 AMB WC



Part D3	Part D3 – Access for People with a Disability		
Clause	Description	Commentary	
	from a carer and specialised equipment such as an overhead hoist and adjustable height change table.		

AS142	AS1428.1-2009 – Design for Access and Mobility		
Clause	Description	Commentary	
6.2	Heights of a continuous accessible path of travel Minimum unobstructed height of	Compliance readily achievable	
	accessible path of travel to be 2.0m or 1.98m at doors		
6.3	Width of Accessible Path Minimum unobstructed width of accessible path of travel to be 1.0m. Fixtures and fittings, including skirtings not to intrude.	Compliance readily achievable	
6.4	Passing space for wheelchairs - 6.4 of AS1428.1 Passing space for 2 persons using wheelchairs to be minimum 1.8m width and 2.0m length, spaced no more than 20m apart	Compliance readily achievable	
6.5	 Circulation Space for Wheelchair Turns The accessible areas must allow for sufficient dimensions to allow for the following turns to be undertaken by a wheelchair : 60° to 90° - 1500mm x 1500mm with splay 30° to 60° - 500mm x 500mm internal splay 90° to 180° - 2070mm long (in the direction of travel) x 1.54m wide 	Compliance readily achievable	



AS1428	3.1-2009 – Design for Access and N	lobility
Clause	Description	Commentary
7	Floor Surfaces of Accessible Paths	Compliance readily achievable – further details to be provided as design
	Provide a smooth transition between abutting surfaces. A construction tolerance of 3mm for vertical differences is allowable or 5mm where edges are rounded or bevelled. For paved surfaces with raked joints, a joint variation between the mortar joint and top of paving shall not exceed 2mm.	develops
	Particular attention should be paid to junctions of new and existing surfaces.	
	All new floor surfaces must achieve an appropriate non-slip finish. R10/P3 recommended for dry floors and R11/P4 for wet floors.	
	 Carpets and other soft coverings: The pile height or pile thickness shall not exceed 11mm and the carpet backing thickness shall not exceed 4mm – 15mm respectively Grates along an accessible path of travel – the openings shall not exceed 13mm in diameter 	
10	Walkways, Ramps and Landings - Walkways, ramps and landings provided	Compliance readily achievable – further details to be provided as design develops
	along an accessible path must comply with Clause 10 of AS1428.1(2009). Refer to item 31.	Details including proposed gradients, RLs, handrail and tactile details to be provided for further review as the design develops towards CWC.
	 Landings Walkways and ramps - No change in direction - length not less than 1200mm. Where there 	



AS142	8.1-2009 – Design for Access and N	lobility
Clause	Description	Commentary
	is change in direction not exceeding 90° the landing shall be not less than 1500mm	
	 Step ramp the length shall not be less than 1200mm in the direction of travel. Change in direction the length shall be a min of 1500mm 	SPORTS STORF PF STORF
	 Kerb ramps The length of landings shall not be less than 1200mm. T-junction – min of 1500mmx 2000mm. Single change in direction shall be 1500mm x 1500mm. 	
11	Stairways All new stairways must comply with Part 11 of AS1428.1-2009 being opaque risers and 30% contrasting nosing's, stairs should contain at least 2 steps and no more than 18 in each flight. Stairs and landings within a fire isolated exits must comply with Part 11.1 (f) and (g) being 30% contrasting nosing strips. The strip shall have a maximum of 15mm from the front of nosing, be between 50mm – 75mm deep across the full width of the stair. The nosing shall not extend further	Compliance readily achievable – further details to be provided as design develops Further details of all proposed stairways to be provided as the design develops towards CWC.



AS142	AS1428.1-2009 – Design for Access and Mobility	
Clause		Commentary
	than 10mm down the riser. TGSIs are required at the top and bottom of the stair.	
12	 Handrails Accessible handrails are to be provided to all new stairs and ramps in accordance with AS1428.1-2009. Notably 1:10 step ramps that are no longer than 1900mm need not comply. Accessible Handrails are required to be on both sides of accessible stairs with extensions and design requirements in accordance with AS1428.1-2009 as follows: Handrails to be provided to both sides of the stair Handrails to extend 300mm past the top riser, parallel to the floor At the base of the stairs, handrails must extend one tread width, continuing the angle of the handrail, plus 300mm Handrails to be installed at a continuous height of between 865mm and 1000mm above the nosing of the stairs as well as between 665mm – 750mm for primary school users 	Compliance readily achievable – further details to be provided as design develops Further details of all proposed stairways and ramps to be provided as the design develops towards the Crown Works Certificate.



AS1428	.1-2009 – Design for Access and M	lobility
Clause	Description	Commentary
Clause	 Where a balustrade is required at greater height, both shall be provided Provide circular or elliptical handrails with a diameter of 3050mm for not less than 270° around the uppermost surface Handrails must be securely fixed and rigid with the ends turned downwards through an angle of 180° for a minimum of 100mm, return to an end post or returned away to side wall Exposed edges and corners of handrails must be finished with a safety radius of not less than 5mm Provide a clearance of not less than 50mm between the handrail and adjacent wall or other obstruction. This clearance to extend above the handrails must be constructed and fixed with no obstruction to the passage of a hand along the length of the rail Handrails must not encroach into circulation spaces such as 	Commentary
	at doorways.	
	Handrails to fire isolated stairs Handrails within fire isolated stairs serving	It is noted that external stairs in lieu of fire isolated stairs are to be utilised as part of the design.
	storeys required to be accessible are	Note where sprinklers are adopted
	to	under the design, the stairs become
	comply with the following;Handrails to be provided to one	non-fire isolated stairs. Refer to the BCA Design Compliance Report Ref. GHPS
	• Findraits to be provided to one side of the stair	SSDA_4.4_BCA Design Compliance
	Handrails must not encroach	Report_October 2022 by MBC Group for
	into circulation spaces such as at doorways	further information.
	 Provide circular or elliptical handrails with a diameter of 	



AS142	8.1-2009 – Design for Access and N	lobility
Clause	Description	Commentary
	 3050mm for not less than 270° around the uppermost surface Exposed edges and corners of handrails must be finished with a safety radius of not less than 5mm Handrails to be installed at a continuous height throughout of between 865mm and 1000mm above the nosing of the stairs and landings Handrails must be securely fixed and rigid with the ends turned downwards through an angle of 180° for a minimum of 100mm, return to an end post or returned away to side wall Provide a clearance of not less than 50mm between the handrail and adjacent wall or other obstruction. This clearance to extend above the handrail by no less than 600mm Handrails must be constructed and fixed with no obstruction to the passage of a hand along the length of the rail The inside handrail at landings shall be continuous 	
13.1	Doorways - Luminance Contrast All new doorways in accessible areas shall have a minimum luminance contrast of 30% provided between: a. door leaf and door jamb b. door leaf and adjacent wall c. architrave and wall	Compliance readily achievable – further details to be provided as design develops towards the Crown Works Certificate.

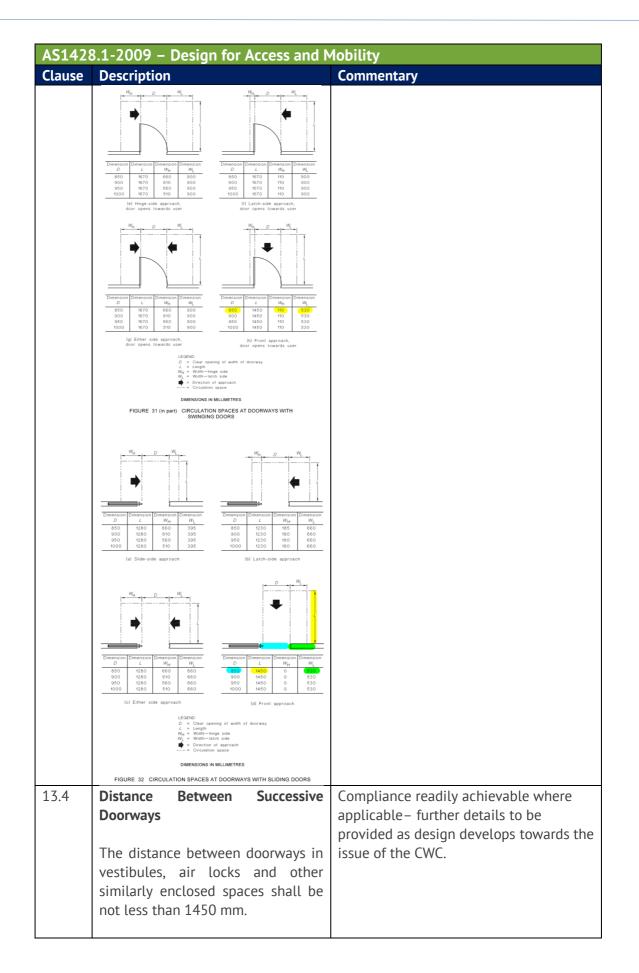


AS142	8.1-2009 – Design for Access and N	1obility
Clause	Description	Commentary
	e. door jamb and adjacent wall.	
	The minimum width of the area of luminance	
	contrast shall be 50mm.	
13.2	Clear Opening of Doorways	The following commentary is provided:
	All new doorways in accessible areas are to be a minimum of 850mm clear opening. Where there are multiple leaves, at least one leaf must be compliant and no less than 850mm clear.	 Block A and B Doorways within Blocks A and B were typically noted as being scaled at 750mm – 800mm. As this building is required to be accessible, all doorways are required to be a minimum 850mm wide. Architect to note and ensure this detail is provided in the next iteration of design.
		CLERICAL / PRINTING / WORKROOM
		STAFF EOT TBC A: 13m ² STAFF EOT TBC A: 13m ² STAFF EOT TBC A: 13m ²
13.3	Circulation Space Around	The following commentary is provided:
	Accessible Doors	Block A and B
	All doors are to be provided with clear	 Inadequate latchside door circulation spaces were noted in a



1-2009 – Design for Access and N Description	Commentary
circulation space to meet Clause 13 of AS1428.1-2009 to allow a wheelchair user to approach and operate the door from the general corridors and from within the individual rooms, dependent on the type of door (sliding or swing) and the direction of approach	few locations to be less than 510mm (when door is swinging away from the user) and 530mm (when the door is swinging towards the user). Architect to note the below locations and ensure that all door circulation spaces comply with the relevant requirements of AS1428.1- 2009
	to be a minimum 530mm out from any internal corner.







AS1428	8.1-2009 – Design for Access and N	lobility
Clause	Description	Commentary
	Where the doors encroach into space, the distance shall be not less than 1450 mm plus	
	the door leaf width.	
13.5	Door ControlsAll new doors in accessible areas must be provided with handles and latching that allow single hand operation as follows at a height of 900mm-1100mm above FFL.D-lever type handles are typically recommended to swing type doors and D-pull handles should be provided to sliding doors.The clearance between the handle and the back plate or door face at the centre grip section of the handle shall be not less than 35mm and not more than 45mm.For doors other than fire doors and smoke doors where a door closer is fitted, the force required at the door handle to operate the door shall not exceed the following:(i) To initially open the door 20N (iii) To hold the door open between 60° and 90°20N	Compliance readily achievable – further details to be provided as design develops Further details of the GLS sliding doors are required to be provided confirming that the 20N force will not be exceeded during operation prior to the issue of the CWC.
13.5	Automatic Door Controls Automatic door controls such as	Compliance achievable where proposed. Architect and Electrical Consultants to note where proposed.
	card readers shall be located no	



AS1428	AS1428.1-2009 – Design for Access and Mobility				
Clause	Description	Commentary			
	closer than 500mm from internal				
	corners and shall have a surface				
	gradient no steeper than 1:40.				
14	Switches and general purpose	Compliance readily achievable where			
	outlets	applicable – further details to be			
		provided as design develops			
	All switches and controls on an				
	accessible				
	path of travel, other than general				
	purpose outlets, shall be located				
	not less than 900 mm nor more				
	than 1100 mm above the plane of				
	the finished floor and not less than				
	500 mm from internal corners				
	except where on the architrave on				
	the latch side.				



3.9 General Accessibility Assessment Recommendations

Further to the above prescriptive requirements dictated by the Building Code of Australia and its relevant Australian Standards, the below is a summary of prescriptive requirements under AS1428.2-1994 that are recommendations to be incorporated into the design. It should be noted that AS1428.2-1994 is not a referenced standard under the BCA and are therefore not mandatory to be implemented into the design.

The below table provides a list of advisory recommendations from AS1428.2-1994 should they be incorporated into the design. These are as follows:

AS1428.2-1994 Design for Access and Mobility				
Clause	Description	Commentary		
10.2.2	Stairway Handrail Where there is a background wall, handrails shall have a luminance contrast factor with the wall of not less than 30%.	Advisory note only		
19.1	Lighting It is recommended that consideration be given to providing lighting to meet the requirements of AS1428.2. NOTES: 1 The following minimum levels of maintenance illumination are recommend Entrances Passageways and walkway Stairs 150 lx Stairs Lifts See AS 1735.12 Toilet and locker rooms Counter tops 250 lx General displays 200 lx 200 lx	Advisory note only		
15	Sanitary Facilities At least one emergency call button which complies with AS 2999 shall be installed in accordance with Clause 23 in each sanitary facility or combined facility. Separate call buttons should be placed near the WC pan and shower recess.	Advisory note only		
17.3	Illumination of signs shall be provided in accordance with Clause 19 for general displays. Lighting shall be placed so that unwanted reflections shall not occur on the sign.	Advisory note only		



AS1428	AS1428.2-1994 Design for Access and Mobility				
Clause	Description	Commentary			
	The luminance factor of the surface of numbers,				
	letters or symbols shall be not less than 0.3				
	(30%) different from their background.				
17.4	Location of Signs	Advisory note only			
	Signs including symbols, numbering and				
	lettering shall be located where they are				
	clearly visible to people in both a seated and				
	standing position.				
	Signs should be placed within a zone at a				
	height not less than 1400 mm and not more				
	than 1600 mm above the plane of the finished				
	floor.				
	Where space in this zone is used up, the zone				
	for				
	placement of signs may be extended downward				
	to not less than 1000 mm from the plane of the				
	finished floor. This height assists people to				
	read from either a seated or a standing				
	position, and also assists people with low				
	vision to read the information on the sign.				
	Letters and symbols in relief assist people with				
	severe visual disabilities				
	Where a sign can be temporarily obscured, e.g.				
	in a crowd, the sign should be placed at a				
	height of not less than 2000 mm above the				
	plane of the finished floor.				
18.2	Emergency Warning Systems Clause	Advisory note only			
	Emergency warning systems shall include both				
	audible alarms complying with Clause 18.2.2				
	and visual alarms complying with Clause 18.2.3.				
	This applies to emergency evacuation signals,				
	traffic signals and audible alarms for safety.				
22	Reach Ranges	Advisory note only			
	Forward reach wheelchair users - If the clear				
	floor space allows only forward approach to an				
	object by a person in a wheelchair, objects shall				
	be in the reach range shown in Figure 20(a). If				
	5				
	the high forward reach is over an obstruction,				



AS1428.2-1994 Design for Access and Mobility				
Clause	Description	Commentary		
	objects shall be within the reach range shown in Figure 20(b).			
	For Series and For Series and Constant of Series and Se			
	Reach Negle Band and Deal And Dea			
22.2	Side Reach	Advisory note only		
	Side reach wheelchair users - If the clear floor space allows parallel approach to an object by a person in a wheelchair, objects shall be in the reach range shown in Figure 21(a). If the side reach is over an obstruction, objects shall be within the reach range shown in Figure 21(b).			
	() High and low other mathins.			
22.3	Reach Range for Ambulant Disabilities	Advisory note only		
	1670 1330 1590 100 100 100 100 100 100 100 1			
22.4	Zone of Common Reach	Advisory note only		



	.2-1994 Design for Access and Mobility	
Clause	Description	Commentary
	The zone for reach to objects which will be	
	suitable for both ambulant people with	
	disabilities and wheelchair users.	
	The zone of common reach includes those	
	dimensions for shelves, fittings, kitchen and	
	laundry equipment, and items such as vending	
	machines and street furniture, that permit ease	
	of reach for both people who are standing and	
	people who are sitting.	
	The zone is obtained by using the maximum	
	reach sideways to a shelf for people sitting in a	
	wheelchair and the lowest reach for people	
	who are standing and may have stiff hips and	
	knees	
	or balance problems.	
	The intention is that all critical controls, areas	
	of operation and storage of equipment	
	commonly used by most members of the	
	community and people in a household will be	
	placed within	
	this zone of common reach.	
	(F) 300	
	500	
24	Furniture and Fitments	Advisory note only
- 1		
	Tables, counters and worktops - No individual	
	table, counter or worktop height and clearance	
	beneath will suit all users with disabilities. A	
	bench with easily adjustable height within the	
	range of 700 mm to 850 mm from the finished	
	5	
	floor is preferred. Some users will be unable to	
7.4	use a bench unless it is at the correct height.	Advicant pata anti-
24	Accessible Counter Height	Advisory note only



AS1428.	AS1428.2-1994 Design for Access and Mobility				
Clause	Description	Commentary			
	Although not required to meet minimum regulatory compliance of the BCA, it is recommended that consideration be given to an accessible counter, being a height of 850mm =/1 20mm and clear height underneath of 820mm +/- 20mm.				
24	Height of unit where a single table, counter or	Advisory note only			
	worktop only can be provided				
	Where a single unit only is provided, the height to the top of the unit and the height beneath the unit shall be as follows: a. Height from the finished floor to the top of the unit: 850 ±20 mm b. Height of clearance beneath the unit from the finished floor: 820 ±20 mm.				
24	Height of unit where two tables, counters or	Advisory note only			
	 worktops can be provided Where two units are provided, the height to the top of each unit and clearance beneath each unit shall be as follows: a. Height from the finished floor to the top of the unit: (i) 1st unit: 750 ±20 mm (ii) 2nd unit: 850 ±20 mm b. Height of clearance beneath unit, from the finished floor: (i) 1st unit: 730 ±20 mm (ii) 2nd unit: 820 ±20 mm 				
24	Width of Seating Spaces	Advisory note only			
	In order to provide a wheelchair seating space, the minimum clearance width between the legs or other fixtures beneath a table, counter or worktop on at least one accessible face of the unit shall be 800 mm.				
24	Knee and Foot Clearance	Advisory note only			
	A minimum clearance beneath the table, counter or worktop at wheelchair seating spaces shall be maintained. Pedestal tables and tables				



AS1428	AS1428.2-1994 Design for Access and Mobility				
Clause	Description	Commentary			
	with splayed legs are not recommended. Tables with corner legs are preferred.				
24.2	 Storage Accessible storage facilities such as cabinets, shelves, cupboards and drawers shall comply with the following: Clear floor space A clear floor space of not less than 800 mm x 1300 mm that allows either a forward or parallel approach by a person using a wheelchair shall be provided at accessible storage facilities Height Accessible storage spaces shall be within one of the reach ranges specified in Clause 22. Clothes-hanging rods or hooks shall be a maximum of 1350 mm from the floor (see Figure 28) Hardware for accessible storage facilities shall comply with Clause 23. Touch latches and D-shaped pulls are acceptable. Sliding doors on cupboards are preferred. These allow manoeuvring space for wheelchairs and reduce the risk of injury to visually impaired people. Lightweight gliders should be installed for drawers. 	Advisory note only			

4 Appendix A – Architectural Plans Reviewed

The following documentation, prepared by Bennett and Trimble was used in the assessment and preparation of this report: -

Drawing No.	Title	Date	Drawn By	Revision
			BENNETT	
SSDA.01	COVER	05/10/2022	AND	С
			TRIMBLE	
			BENNETT	
SSDA.02	EXISTING SITE PLAN	05/10/2022	AND	С
			TRIMBLE	
			BENNETT	
SSDA.03	SITE PLAN – GF	05/10/2022	AND	D
			TRIMBLE	
			BENNETT	
SSDA.04	SITE PLAN – L1	05/10/2022	AND	С
			TRIMBLE	
			BENNETT	
SSDA.05	SITE PLAN – L2	05/10/2022	AND	С
			TRIMBLE	
			BENNETT	
SSDA.06	SITE PLAN – ROOF	05/10/2022	AND	С
			TRIMBLE	
			BENNETT	
SSDA.07	GA – GROUND LEVEL	05/10/2022	AND	С
			TRIMBLE	
			BENNETT	
SSDA.08	GA – LEVEL 1	05/10/2022	AND	С
			TRIMBLE	
			BENNETT	
SSDA.09	GA – LEVEL 2	05/10/2022	AND	С
			TRIMBLE	
			BENNETT	
SSDA.10	GA – ROOF	05/10/2022	AND	С
			TRIMBLE	
			BENNETT	
SSDA.11	ELEVATIONS	05/10/2022	AND	С
			TRIMBLE	
			BENNETT	
SSDA.12	ELEVATIONS	05/10/2022	AND	С
			TRIMBLE	
			BENNETT	
SSDA.13	SITE SECTIONS	05/10/2022	AND	С
			TRIMBLE	



SSDA.14	SIGNAGE	05/10/2022	BENNETT AND TRIMBLE	С
SSDA.15	MATERIAL SCHEDULE	05/10/2022	BENNETT AND TRIMBLE	С
SSDA.16	SHADOW DIAGRAMS	05/10/2022	BENNETT AND TRIMBLE	С





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