T: 0493 100 306

E: admin@access.asn.au W: www.access.asn.au



PRACTICE NOTE PN06

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Principal Material Contibutors: Howard Moutrie

Co-ordinator:

Howard Moutrie

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Topic: Sanitary Facilities

Other Referenced Standards and Codes in this Practice Note:

• AS 1428.1-2009 Design for access and mobility - General requirements for access - New building work.

Preparation of this Practice Note has included consultation with the Standards Australia committee personnel responsible for the previously listed standards and people with disabilities.

Purpose of this Practice Note: Clarification Of The Requirements For Sanitary Facilities in AS 1428.1

- Clarification of Fig 50 and the requirements for combined facilities
- Clarification of what items can encroach into the circulation areas
- Discussion on the location of the shower hose inlet connection

Background information on the drafting of Australian Standards

The Australian Standards contain information which is mandatory, normative and informative. Understanding this is necessary for interpreting the Standards.

Mandatory is a term used to describe a provision which must be complied with in order to conform with the Standard. It relates to an individual requirement only. Typically, a requirement will be mandatory if it is required to comply with the BCA.

Normative is basically the same as mandatory but rather than referring to a particular requirement it can refer to a whole element or part and which may contain a number mandatory requirements.

Informative is a term used to describe additional information or guidelines used to explain the mandatory requirements. Notes are generally informative.

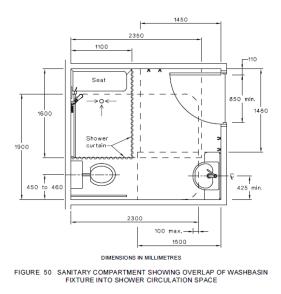
These terms apply to both text and figures. If a mandatory clause refers to a Figure then the figure will usually be



considered to be mandatory, for example, the layout shall comply with Fig 4, but where the figure is used to explain the requirements graphically it may be considered to be informative.

Clarification of Fig 50

Fig 50 of AS 1428.1 shows a combined bathroom with toilet and shower and is referenced in Clause 15.6.



There are two references, firstly, to say that circulation spaces *shall be in accordance with Clause 15.2.8 and Figures 43 to 47 and 50* and secondly, to say that *the washbasin may encroach into the WC space in accordance with Figure 43 and 50.* It is considered that the reference to Fig 50 in each case is in error and it is hoped that this will be corrected in the next iteration of AS 1428.1. The reference should be to Fig 52.

In fact, the whole figure is misleading.

Firstly, the heading of the Figure is Sanitary Compartment Showing the Overlap Of Washbasin Fixture into the Shower Circulation Space which is incorrect on two counts – the figure doesn't show any encroachment and, from the text, the basin is not allowed to encroach into the shower circulation space. Secondly, the figure is referenced in Clause 15.2.8 to indicate the circulation spaces. But that is not the intention of the Figure and nor does it show all requirements. The Figure indicates a 2 walled shower option and ignores the 3 walled option.

The Figure was intended to be an informative Figure, showing a possible layout of a combined facility, but has become a normative Figure by it being incorrectly referenced.

The confusion is continued by showing the shower seat in the down position. As it happens, the toilet circulation space extends up to the seat and this Figure is often mis-interpreted as requiring the seat to be outside the toilet circulation space, particularly because it is referenced in Clause 15.2.8 as providing the requirements for circulation space. The seat can be folded up against the wall and the toilet circlation space can extend up to the seat in the folded up position. Thus, if a 3-walled shower is used, the width of the combined facility can be around 2000mm rather than 2300mm when calculated with the seat down. Assuming a width for the shower seat of 100mm in the raised position.



What Items Can Encroach into Toilet and Shower Circulation Spaces

The Standard is again confusing on this issue.

Clause 15.6(b) says that fixtures shall not encroach into circulation spaces, with the exception of the washbasin, which may encroach into the toilet circulation space up to 100mm and into the door circulation space. This is contrary to Clause 15.2.8.1 which provides a list of items which are permitted to encroach into the toilet circulation space (with some limitation on height) and Clause 15.5.1 which includes a list of items which can encroach into the shower circulation space. It is considered that Clauses 15.2.8.1 and 15.5.1 should prevail. It is noted, however, that while the circulation spaces for the toilet and shower can overlap, any encroachments which are allowed in the toilet circulation space and not the shower circulation space should be limited to the toilet circulation space.

The Location of the Shower Hose Inlet Connection

AS 1428.1-2009 introduced, in Figure 48, a height location for the shower inlet connection point. The reason was to make it easier to wash underneath oneself when seated, but it creates several issues.

Firstly, it allows the shower rose to sit on the floor which requires the installation of a backflow prevention device to prevent water in the supply pipes becoming contaminated. Though costly, this can be done and the Standard notes that such a device is required.

Secondly, if the shower head can reach into the toilet, as would be the case of the traditional layout of the shower next to the toilet, there is a risk of further contamination. To overcome this high level contamination, the plumbing rules require the use of an RPZ backflow prevention device to be fitted, however, these are large, expensive and cannot be fitted to a shower. This means that the traditional layout, and that shown in Figure 50 of AS 1428.1 cannot be achieved.

It is acknowledged that there are instances where this layout has been installed in contravention of the plumbing rules. To achieve a compliant installation, the room must be larger to allow the separation of the toilet and shower. Alternatively, the Standard must be changed or ignored.

Ignoring the Standard may not be an option, but an examination of the requirement is useful. The only reference to the hose connection point is in Fig 48, there is no reference to the location in the text. So, it needs to be determined if the Figure is Normative or Informative. There are arguments for it being either, with it being Normative when it is providing information referenced in the text. So there is an argument that the hose connection point is not a Mandatory or Normative requirement.

From a functioal point of view, is it necessary to provide a connection point at 700mm above the floor and also



provide a 1500mm long hose to allow a person to wash themselves?

Each member needs to make their own decision on this at least until AS1428.1 - 2021 is referenced which in some ways clarifies the requirements.

Conclusion and Recommendations

- 1. The design of a combined shower and toilet facility allows the circulation spaces to overlap and that the shower seta is assumed to be in the raised position.
- 2. The fixtures which can encroach into the circulation areas are those identified under the specific section for toilet and shower.
- 3. Some items may be allowed to encroach into the toilet circulation space but not into the shower circulation space or vice versa.
- 4. The location of the shower hose wall connection point may not be a mandatory requirement.

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