

Dept Reference: MR26/1255/5

DOT POINTS FOR THE MINISTER FOR SPORT

**SUBJECT: NORTHERN SUBURBS COMMUNITY RECREATION HUB – FURTHER
QUESTIONS FROM DR ELIZABETH CABALLERO – NON-GENDER
AMENITY CONCERNS**

- **Who approved the removal of sex-based facilities**

Sex-based facilities were not removed from the Northern Suburbs Community Recreation Hub (the Hub).

The approved design provides for sex-based amenities alongside additional flexible and all-gender options. For example, the Northern Tasmania Netball Association (NTNA) areas include amenities that can be designated as male or female, while the gymnastics area provides clearly defined male and female change rooms.

The inclusion of flexible, dual-purpose, and all-gender facilities reflects a broader design approach focused on safety, accessibility, and operational flexibility, not the removal of sex-based spaces. The inclusion of gender-neutral facilities reflects contemporary best practice, aimed at minimising opportunities for bullying and other anti-social behaviour.

The final design, including all amenities, was approved by the Hub's Project Steering Committee, comprising representatives from the Tasmanian Government, Tasmania Police, the Office of the Coordinator-General, and the City of Launceston, following key tenant user stakeholder consultation and alignment with contemporary design principles.

Background

The Northern Tasmania Netball Association (NTNA) component of the Hub, with respect to **netball** facilities, includes change rooms with fully enclosed cubicles for toilets, showers, and additional changing spaces. These areas can be designated as male or female amenities using magnetic interface signage. This flexible approach supports local, state, and national competitions, with arrangements managed by NTNA based on operational requirements. When configured in change room mode, patrons may also choose to use the all-gender amenities close by.

Within the **gymnastics** area of the Hub, there are designated male and female change rooms, each of which includes a private single-user changing space for individuals who prefer not to change in front of others. These spaces are intended to provide additional privacy and comfort for users who may feel more comfortable in a separate, enclosed environment.

In relation to the amenities, in the main area of the facility, adjacent to the **multipurpose courts 'anti-bullying' amenities** consisting of dual purpose change rooms and fully enclosed individual rooms (toilets, showers and change rooms), these amenities are dual-purpose. During tournaments or competition games, these spaces function as team change rooms, with roller doors lowered to provide separation and privacy. Importantly, when team use isn't required in these amenities, the spaces remain open to surrounding areas, meaning fewer unsupervised zones and greater natural oversight.

The design also responds to the relocation of PCYC North and its primary users, predominantly young people, including youth at risk. As a result, there is a strong focus on safety and anti-bullying principles, with features such as passive supervision, clear sightlines, and controlled user flows. The amenities adjacent to the multipurpose courts (antibullying amenities) are designed to support both everyday community use and competition, with the flexibility to convert into change rooms when required.

- **Whether any formal safeguarding assessment regarding women and girls was undertaken**

A safety and security assessment was undertaken during the design phase, taking into account people of all genders and diverse cultural backgrounds, to ensure the Hub provides a safe and inclusive environment for all users.

- **Whether female sporting groups or community users were consulted**

Consultation was undertaken throughout all stages of the design process with a range of sporting and community groups, including NTNA (a predominantly female user group), PCYC North (including representatives from Tasmania Police), Premiers Disability Advisory Council, ParaQuad within Physical Disability Sports Tasmania, Launceston Basketball, and the Northern Suburbs Community Centre.

- **Whether the Government would consider reviewing the current arrangement over time**

The Hub's design provides for sex-based amenities alongside additional flexible and all-gender options. The current arrangement reflects contemporary design standards and aligns with modern best practice in inclusive public sports facilities. The design incorporates fully enclosed, individual cubicles, which enhance privacy and safety for all users.

Given that the facility has been delivered in accordance with current design specifications and community infrastructure guidelines, there are no plans to review or alter the existing arrangement.

- **Clarification to the different approach adopted in Stage 3 in comparison to Stage 2**

It should be noted that the NTNA netball component and the gymnastics area provide sex-based amenities.

However, within the main central area delivered under Stage 2, the amenity layout differs from Stage 3. These variations in amenity and toilet configurations reflect the distinct needs of user groups and the intended function of each space.

In Stage 2, as previously noted above, the design responds to the relocation of PCYC North and its primary users, predominantly young people, including youth at risk. As a result, there is a strong focus on safety and anti-bullying principles, with features such as passive supervision, clear sightlines, and controlled user flows. The amenities adjacent to the multipurpose courts (antibullying amenities) are designed to support both everyday community use and competition, with the flexibility to convert into change rooms when required.

In contrast, Stage 3 is designed for a basketball competition environment, including higher-level junior competition. Amenities for male and female users are configured off a central corridor leading to fixed grandstand seating, with capacity for approximately 400-500 spectators. This creates concentrated peak demand, requiring a layout that supports high-volume, simultaneous access and minimises queuing - unlike Stage 2 in the main central area, which does not have comparable fixed seating.

The Stage 2 netball amenities are intended to operate in a similar manner to a basketball competition environment. However, when not in competition mode being used as change rooms, these can be designated as male and female amenities through the use of magnetic interface signage.

Ben Moloney
General Manager

7 May 2026

Prepared by:	Out of Scope	Cleared by:	Alex Barber
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Date:	4 May 2026	Date:	7 May 2026
Phone:	Out of Scope	Phone:	Out of Scope

Dept Reference: MR26/932/3

DOT POINTS FOR THE MINISTER FOR SPORT

SUBJECT: ALL-GENDER AMENITIES AT THE NORTHERN SUBURBS COMMUNITY RECREATION HUB (THE HUB)

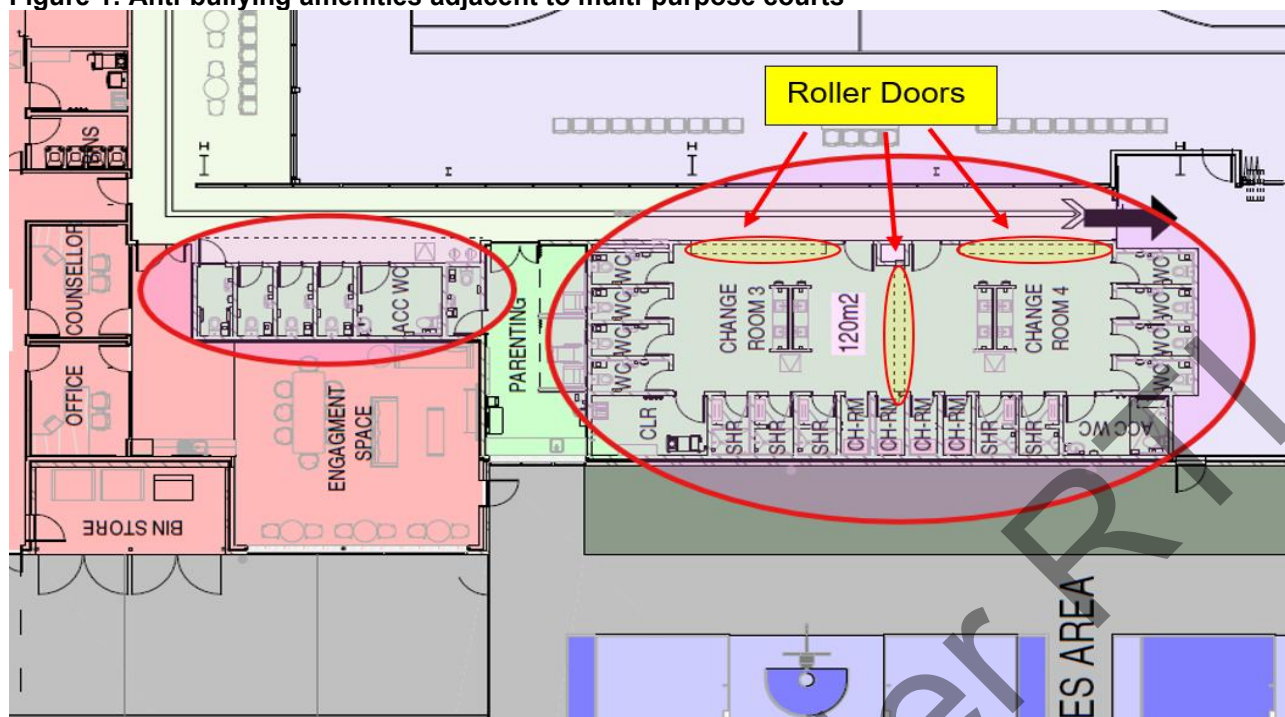
- On 30 March 2026, Dr Elizabeth Caballero, a Retired General Practitioner, wrote to the Minister for Sport on behalf of Women Speak Tasmania raising concerns that the Northern Suburbs Community Recreation Hub's (the Hub) toilets and change rooms are fully gender-neutral, with no single-sex options available for women, men, or people with disabilities.
- Dr Caballero states that while the facility includes individual cubicles, the removal of sex-based separation is seen as reducing safety, privacy and comfort, particularly for women and girls in a busy, high-use environment. Dr Caballero notes that the National Construction Code 2025 permits, but does not require, all-gender facilities, and states that evidence from comparable settings indicates higher rates of incidents in mixed-sex spaces.
- Dr Caballero is seeking a review of the current design and supports the inclusion of a portion of single-sex (female-only and male-only) cubicles alongside the existing all-gender options and ongoing monitoring and reporting of safety and privacy concerns.
- For clarity, there is a public misconception that the Hub Stage 2 development cost \$62 million. The Hub Stage 2 budget allocation was \$43.6 million. Through effective budget management, Infrastructure Tasmania has delivered a high-quality facility that appears to exceed its actual cost. The Hub Stage 3 expansion has a budget of \$18.9 million, bringing the total funding allocation for the Hub Stage 2 and Stage 3 to \$62.5 million.

All-Gender Amenities at the Hub

- A letter has been prepared for the Minister for Sport to respond to Dr Caballero's correspondence dated 30 March 2026.
- The Hub's all-gender amenities, including toilets, showers, and change rooms, have been deliberately designed as a contemporary, evidence-based response to safety and inclusion, following Crime Prevention Through Environmental Design (CPTED) principles aligned with contemporary Australian standards, safety principles, and the operational needs of a modern, community-focused sports facility. These principles prioritise visibility, passive surveillance, and the elimination of isolated spaces to reduce both the risk and fear of inappropriate behaviour. Research indicates that well-designed all-gender facilities reduces opportunities for harassment by removing concealed or unsupervised areas.

- The focus is not simply on separating people by gender, but on designing out risk through visibility, openness, and passive supervision.
- This is a purpose-built, exemplar design for inclusive, all-gender amenities, including change rooms, with a strong emphasis on anti-bullying and user safety, particularly in a youth-focused sporting environment where unsupervised spaces can often be where issues arise.
- Key safety and privacy features include:
 - **Not cubicles** but fully enclosed, self-contained rooms for toilets, showers, and change rooms, constructed with solid masonry walls from floor to ceiling for privacy and security, opening onto visible public spaces for passive surveillance
 - Amenities opening onto a large, shared circulation space, avoiding hidden or isolated areas
 - Clear lines of sight throughout the building, allowing for high levels of passive surveillance for supervision by staff, users, parents and carers
 - No dead-end corridors or isolated rooms, reducing entrapment risks commonly found in traditional amenity layouts
 - Strong lighting and no concealed recesses, reducing opportunities for misuse
 - Clear wayfinding, accessible pathways and strong lighting designed to maintain visibility across the precinct and minimise hidden or unsupervised spaces
 - Integration with surrounding activity areas, keeping amenities visible and connected to the broader facility (e.g. opposite the multi-purpose courts), supporting anti-bullying objectives while maintaining individual privacy.
- As per Figure 1 below, in relation to the amenities adjacent to the multipurpose courts 'anti-bullying' amenities consisting of dual purpose change rooms and fully enclosed individual rooms (toilets, showers and change rooms), these amenities are dual-purpose. During tournaments or competition games, these spaces function as team change rooms, with roller doors lowered to provide separation and privacy. Importantly, when team use isn't required in these amenities, the spaces remain open to surrounding areas, meaning fewer unsupervised zones and greater natural oversight. This approach also supports families and carers in that:
 - Parents can remain nearby and keep visual awareness of their children
 - It allows supervision of multiple children at once, for example, watching one child play sport while another uses the amenities
 - It removes the stress of choosing 'which door' a child should use.
- From an anti-bullying perspective, this design is focused on prevention. Traditional, segregated change rooms and toilets can create enclosed environments where bullying can occur out of sight. Open, well-supervised layouts significantly reduce those risks – refer to Figure 1 below.
- When the change rooms are in use, patrons can access nearby fully enclosed all-gender amenities located along the adjacent corridor – refer to Figure 1.

Figure 1: Anti-bullying amenities adjacent to multi-purpose courts



- The Northern Tasmania Netball Association (NTNA) component of the Hub includes change rooms with fully enclosed cubicles for toilets, showers, and additional changing spaces. These areas can be designated as male or female amenities using magnetic interface signage (refer to Figure 2 – NTNA change rooms). This flexible approach supports local, state, and national competitions, with arrangements managed by NTNA based on operational requirements. When configured in change room mode, patrons may also choose to use the all-gender amenities shown in Figure 3. Additional all-gender amenities are available throughout the Hub (refer to Attachment 2).

Figure 2: NTNA Change Rooms can be converted to single-sex options (male and female) depending on tournament conditions

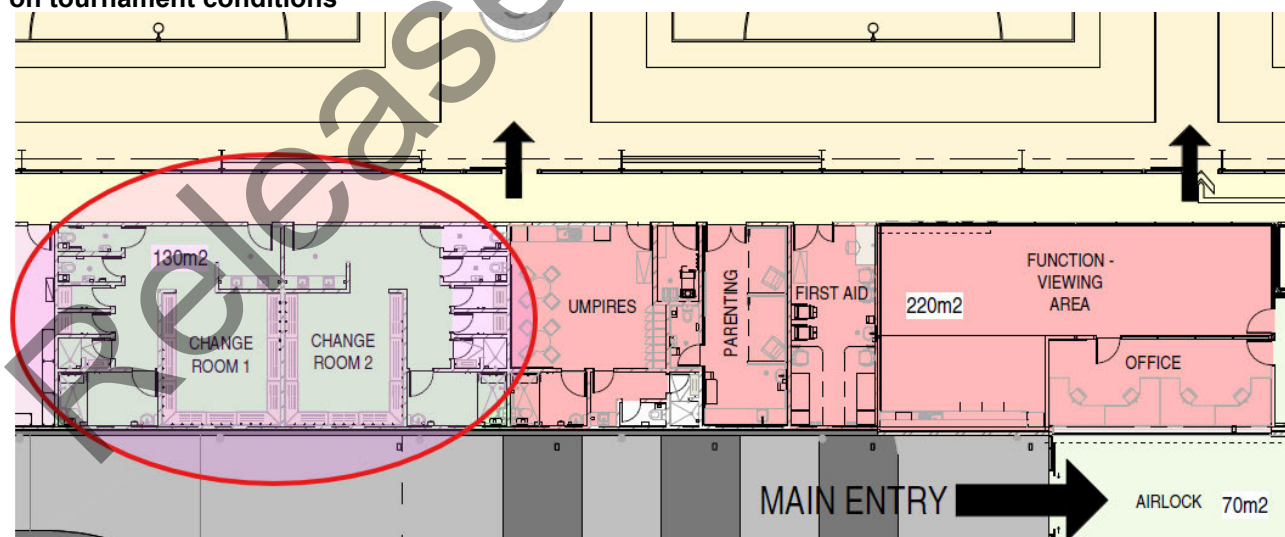
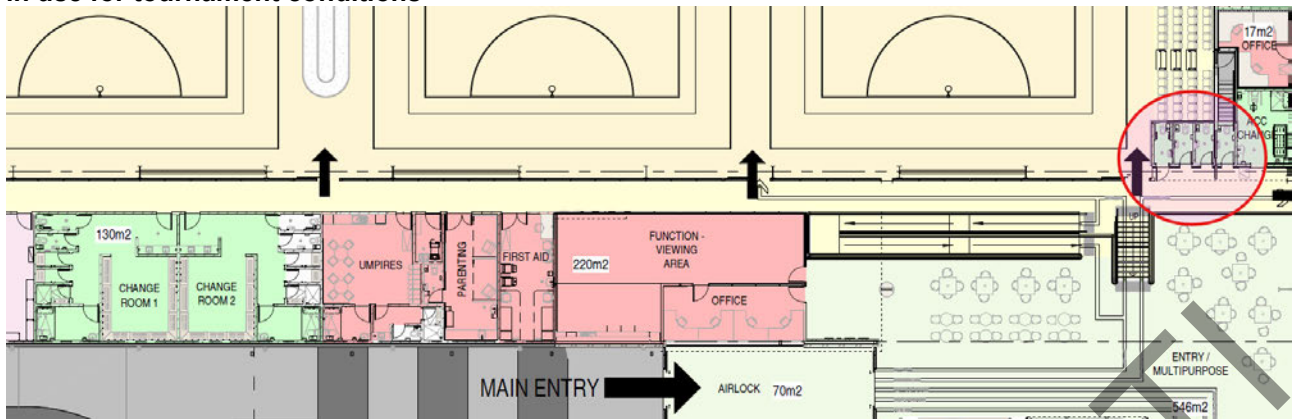
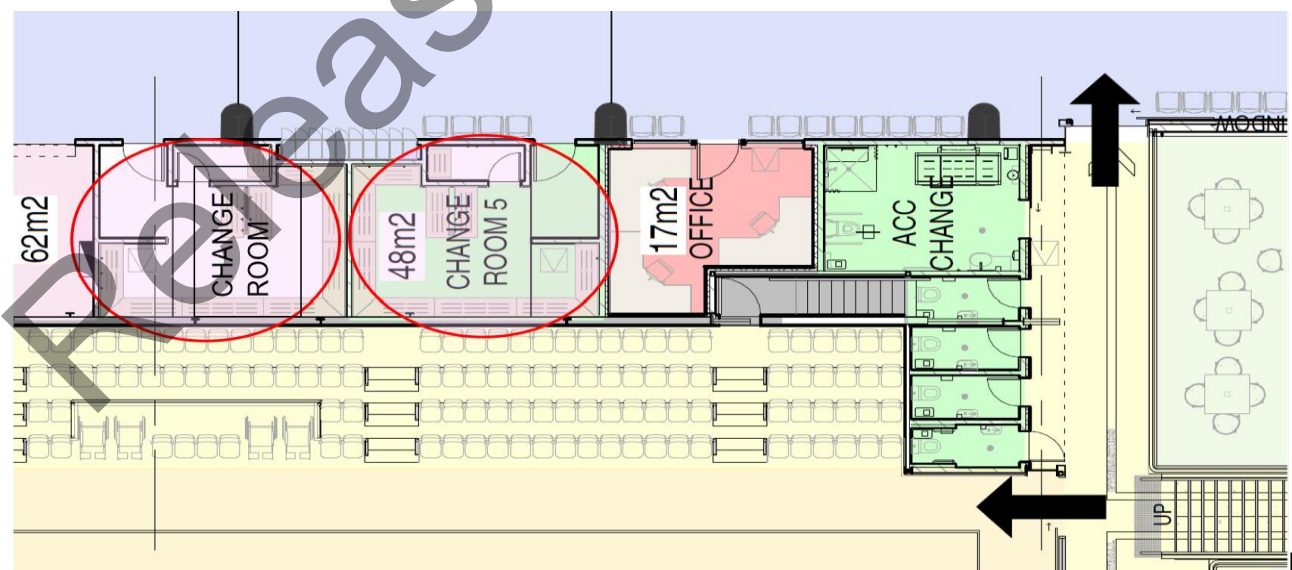


Figure 3: All-gender amenities are in close proximity of the NTNA area should the Change Rooms be in use for tournament conditions



- Amenities are inclusive and flexible, accommodating all people and family structures, ensuring safe and appropriate access for all community members.
- The design considers the cultural diversity of Launceston's northern suburbs, addressing varying safety, privacy, and cultural needs.
- The design supports:
 - Parents with children of a different gender
 - Carers assisting people with disabilities, including where the carer is of a different gender
 - Families managing multiple children in busy sporting environments.
- As per Figure 4, within the gymnastics area of the Hub, there are designated male and female change rooms, each of which includes a private single-user changing space for individuals who prefer not to change in front of others. These spaces are intended to provide additional privacy and comfort for users who may feel more comfortable in a separate, enclosed environment.

Figure 4: Gymnastics area - designated male and female change rooms including private single-user changing space for individuals that prefer not to change in front of others



- The Hub design complies with the National Construction Code 2025, which allows all-gender facilities where fully enclosed sanitary compartments are used, delivering a safe, inclusive, and operationally flexible environment for families, carers, people with disability, and the broader sporting community.

- The safety of all people accessing the Hub is a priority. The Department of State Growth, PCYC North, and the NTNA will continue to observe and review facility use, behaviour, and community feedback to ensure the Hub maintains high standards of safety, privacy, and inclusion.
- Designating portions of the facilities as single-sex (female-only or male-only) would only represent a naming change and would not alter the physical configuration, privacy, or safety performance. All key safety features, including open layout, passive surveillance, and fully enclosed toilets, would remain unchanged. To maintain the integrity of the design principles and align with best practice for all-gender amenities, it is recommended that the facilities do not be re-designated as single-sex.
- In response to the interest and concerns raised, an information sheet outlining the inclusion of all-gender amenities at the Hub, and the rationale behind them, is provided at Attachment 1. This document can be used to assist with enquiries or shared with interested parties for educational purposes.
- The City of Launceston (CoL) has received complaints regarding the all-gender amenities at the Hub. In response, the Mayor Matthew Garwood has publicly expressed his support, using social media to outline the design intent and address concerns. He has encouraged the community to visit the Hub to see first-hand that the facilities are safe, secure, and private, with floor-to-ceiling, fully enclosed individual rooms. He noted there are “no shared cubicles”, “no open change areas”, “nothing hidden”, “nothing seedy”, and described the outcome as “just good design”. Here is a link to Mayor Garwood’s post on Facebook: <https://www.facebook.com/share/p/18XEuFvxFh/>.
- All-gender amenities have been adopted at many sites around the greater Launceston area (and more broadly Tasmania). Locations listed below offer similar layouts and/or principles to those adopted at the Hub:
 - City Park, Launceston
 - Launceston Aquatic Centre
 - The Gorge, Launceston
 - Riverbend Park toilets, Launceston
 - Paterson Street West Public Toilets, Launceston CBD
 - UTAS Stadium is seeing a shift towards provision of more single cubicles rather than communal amenities areas.
 - And an extensive list of Tasmanian schools:
 - Huonville High School
 - Glenora District School
 - King Island District School
 - Wynyard High School
 - Burnie High School
 - Sheffield District School
 - Lilydale District School
 - Reece High School



Christian Gillies
Deputy Secretary, Start6egy Housing, Infrastructure and Planning

13 April 2026

Prepared by:	Out of Scope	Cleared by:	Louise Butterworth
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Date:	2 April 2026	Date:	9 April 2026
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Released under RTH

Attachment 1

Background – All-Gender Amenities at the Northern Suburbs Community Recreation Hub

The inclusion of all-gender toilet and change room facilities at the Hub is a deliberate, evidence-based design decision aligned with contemporary Australian standards, safety principles, and the operational needs of a modern, community-focused sports facility.

1. Safety Through Design (CPTED Principles)

The facility has been designed in accordance with Crime Prevention Through Environmental Design (CPTED), which prioritises visibility, passive surveillance, and the elimination of isolated spaces as the most effective means of reducing both the risk and fear of crime.

Key design features include:

- Clear lines of sight across circulation areas, enabling natural supervision
- Open, highly visible shared zones, reducing concealed or unsupervised spaces
- Strong lighting and intuitive wayfinding, improving user confidence and safety
- Amenities located adjacent to active areas, ensuring consistent passive oversight.

Importantly, safety outcomes are driven by layout and visibility, not by gender segregation alone. Evidence shows that incidents have historically occurred in traditional, sex-segregated facilities, reinforcing that design quality is the critical factor in risk reduction.

2. Privacy and Compliance

All amenities are designed as:

- Fully enclosed, self-contained cubicles (toilet, shower, and change facilities)
- Floor-to-ceiling construction with secure locking, ensuring a high level of individual privacy.

This approach aligns with the National Construction Code, which provides for unisex facilities and emphasises privacy through full-height sanitary compartments.

3. Anti-Bullying and Youth Safety

The Hub is a high-use youth sporting environment, where traditional enclosed change rooms and amenities can present challenges related to bullying and unsupervised behaviour. The adopted design directly addresses this by:

- Reducing hidden or enclosed group spaces
- Increasing passive supervision through open circulation areas
- Allowing staff, parents, and carers to maintain general oversight without compromising individual privacy.

This represents a proactive anti-bullying initiative, supporting safer, more inclusive participation in sport.

4. Accessibility and Inclusion

All-gender amenities improve accessibility and usability for a broad cross-section of the community, including:

- Parents and carers supervising children of different genders
- Individuals with disability requiring assistance

- People who may not feel comfortable in traditional gendered spaces.

The design enables:

- Flexible family use
- Simplified supervision of multiple children
- Reduced confusion and improved user experience.

5. Operational Flexibility

The facility has been designed to support both:

- Peak team-based use (e.g. competitions and events), and
- General community use.

When not in exclusive use by teams, the amenities that are adjacent to the multi-purpose courts:

- Open onto shared circulation areas
- Remain visible and accessible
- Avoid becoming isolated or unsupervised zones.

This ensures consistent safety outcomes across all modes of operation.

6. Contemporary Best Practice

All-gender, fully enclosed amenities are increasingly recognised as best practice in modern public and sporting infrastructure, particularly in facilities designed for:

- High community turnover
- Youth participation
- Multi-use and inclusive programming.

This approach reflects a shift away from reliance on segregation, toward design-led safety, dignity, and inclusivity.

In Summary:

The decision to implement all-gender amenities at the Hub is grounded in:

- Proven CPTED safety principles
- Strong privacy outcomes through fully enclosed floor to ceiling masonry enclosed rooms
- Anti-bullying design for youth environments
- Improved accessibility and family usability
- Alignment with national building standards and contemporary facility design.

Overall, the design delivers a safer, more inclusive, and operationally effective outcome than traditional amenity layouts, addressing both actual risk and community expectations for modern public infrastructure.

[illegible]

Minister for Energy and Renewables
Minister for Parks
Minister for Sport



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Phone: +61 3 6165 7739
Email: minister.duigan@dpac.tas.gov.au

Out of Scope

22nd April

Northern Suburbs Community Recreation Hub – All-Gender Amenities

Dear **Out of Scope**

Thank you for your email dated 31 March 2026, regarding the recently opened Northern Suburbs Community Recreation Hub (the Hub) in Mowbray, and for raising your concerns about the safety, privacy, and comfort of your daughters. The Tasmanian Government appreciates your interest in ensuring safe and appropriate community sporting facilities, particularly for young people.

I acknowledge your concerns regarding privacy, comfort, and safeguarding, especially for children of your daughters' age who are developing a stronger awareness of personal boundaries. These are important considerations and have been carefully taken into account in the design of the facility.

The safety of people accessing the Hub is a priority. The Hub's design is consistent with the National Construction Code 2025, which provides for all-gender facilities where fully enclosed sanitary compartments are used. This approach delivers a safe, inclusive, and operationally flexible facility for a diverse community.

Within the gymnastics area of the Hub, there are designated male and female change rooms, each of which includes a private single-user changing space for individuals who prefer not to change in front of others. These spaces are intended to provide additional privacy and comfort for users who may feel more comfortable in a separate, enclosed environment.

For the remainder of the facility, the Hub's all-gender amenities, including toilets, showers, and change rooms, have been designed as a contemporary, evidence-based response to safety and inclusion. Importantly, these amenities consist of fully enclosed, individual-use rooms with ceiling to floor doors, ensuring that no user is required to undress or use facilities in view of others.

The design follows Crime Prevention Through Environmental Design (CPTED) principles, which emphasise visibility, passive surveillance, and the elimination of isolated spaces as effective measures for reducing both the risk and fear of inappropriate behaviour. Research indicates that well-designed all-gender facilities reduces opportunities for harassment by removing concealed and unsupervised environments.

The all-gender amenities are designed to be inclusive and flexible to accommodate all people. This ensures that all members of the community have access to safe and appropriate toilet, shower, and change room facilities.

The northern suburbs of Launceston is culturally diverse, and the design has been developed with consideration of the community's varying safety, privacy, and cultural needs.

The design supports:

- Parents with children of a different gender
- Carers assisting people with disabilities (including where the carer is of a different gender to the person with the disability)
- Families managing multiple children in a busy sporting environment.

Several accessible toilet facilities are provided throughout the building for disabled users which allow for single sex usage, or for situations where a carer is involved. These accessible toilets also include change tables for parents of babies. There is also a changing places facility.

Key safety and privacy features include:

- Fully enclosed, self-contained rooms for toilets, showers, and change rooms, constructed with solid masonry walls from floor to ceiling to ensure individual privacy and security. Each room opens out onto a highly visible public space supporting passive surveillance.
- Open circulation areas with clear sightlines, enabling passive supervision by staff, users, parents, and carers.
- The elimination of dead-end corridors and isolated spaces, reducing the risk of entrapment or unsupervised areas.
- Clear wayfinding, accessible pathways, and strong lighting minimising hidden or unsupervised spaces.
- Integration with surrounding activity areas, ensuring amenities remain visible and connected to the broader facility. This approach also supports anti-bullying objectives by reducing opportunities for inappropriate behaviour that can occur in concealed spaces within traditional layouts.

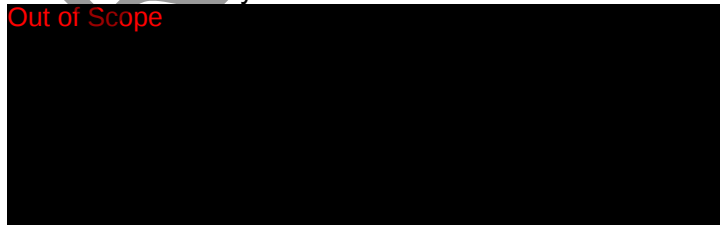
The Department of State Growth, in conjunction with the tenants, PCYC North and Northern Tasmania Netball Association (NTNA), will continue to observe and review facility use, behaviour, and community feedback to ensure the Hub maintains high standards of safety, privacy, and inclusion.

The Hub is open seven-days, between 6am – 8pm Monday to Friday, and between 8am – 5pm on weekends. People are welcome to visit at any time during these hours to view the facilities first-hand.

Thank you again for taking the time to share your concerns. The Tasmanian Government values community input and remains committed to delivering safe, inclusive, and contemporary public infrastructure.

Yours sincerely

Out of Scope



Hon Nick Duigan MLC
Minister for Sport

Minister for Energy and Renewables
Minister for Parks
Minister for Sport

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22nd April 2026

Out of Scope

Northern Suburbs Community Recreation Hub – All-Gender Amenities

Dear Out of Scope

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I acknowledge your emphasis on comfort, privacy, and safeguarding, and understand that these are important considerations for parents of children of your daughters' ages.

The safety of all people accessing the Hub is a priority. The Hub's design is consistent with the National Construction Code 2025, which provides for all-gender facilities where fully enclosed sanitary compartments are used. This approach supports a safe, inclusive, and operationally flexible environment for a diverse community.

Within the gymnastics area of the Hub, there are designated male and female change rooms, each of which includes a private single-user changing space for individuals who prefer not to change in front of others. These spaces are intended to provide additional privacy and comfort for users who may feel more comfortable in a separate, enclosed environment.

For the remainder of the facility, the Hub's all-gender amenities, including toilets, showers, and change rooms, have been designed as a contemporary, evidence-based response to safety and inclusion. The design follows Crime Prevention Through Environmental Design (CPTED) principles, which emphasise visibility, passive surveillance, and the elimination of isolated spaces as the most effective means of reducing both the risk and fear of inappropriate behaviour. Research indicates that well-designed all-gender facilities reduces opportunities for harassment by removing concealed and unsupervised environments.

Importantly, all toilet, shower, and changing spaces within these amenities are fully enclosed, individual-use rooms, providing a high level of privacy for each user. This design ensures that individuals, including young people, are not required to undress or use facilities in view of others.

The all-gender amenities are designed to be inclusive and flexible to accommodate all people. This ensures that all members of the community have access to safe and appropriate toilet, shower, and change room facilities.

The northern suburbs of Launceston is culturally diverse, and the design has been developed with consideration of the community's varying safety, privacy, and cultural needs.

The design supports:

- Parents with children of a different gender.
- Carers assisting people with disabilities (including where the carer is of a different gender to the person with the disability).
- Families managing multiple children in a busy sporting environment.

Several accessible toilet facilities are provided throughout the building for disabled users which allow for single sex usage, or for situations where a carer is involved. These accessible toilets also include change tables for parents of babies.

Key safety and privacy features of the Hub include:

- Fully enclosed, self-contained rooms for toilets, showers, and change rooms, constructed with solid masonry walls from floor to ceiling to ensure individual privacy and security. Each room opens out onto a highly visible public space supporting passive surveillance.
- Open circulation areas with clear sightlines, enabling passive supervision by staff, users, parents, and carers.
- The elimination of dead-end corridors and isolated spaces, reducing the risk of entrapment or unsupervised areas.
- Clear wayfinding, accessible pathways, and strong lighting minimising hidden or unsupervised spaces.
- Integration with surrounding activity areas, ensuring amenities remain visible and connected to the broader facility. This approach also supports anti-bullying objectives by reducing opportunities for inappropriate behaviour that can occur in concealed spaces within traditional layouts.

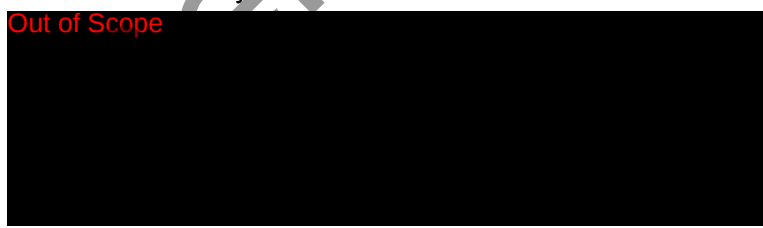
The Department of State Growth, in conjunction with the tenants, PCYC North and Northern Tasmania Netball Association (NTNA), will continue to observe and review facility use, behaviour, and community feedback to ensure the Hub maintains high standards of safety, privacy, and inclusion.

The Hub is open seven-days, between 6am – 8pm Monday to Friday, and between 8am – 5pm on weekends. People are welcome to visit at any time during these hours to view the facilities first-hand.

Thank you again for taking the time to share your concerns. The Tasmanian Government values community input and remains committed to delivering safe, inclusive, and contemporary public infrastructure that supports participation for all.

Yours sincerely

Out of Scope

A large black rectangular redaction box covers the signature area, obscuring the name and any handwritten notes.

Hon Nick Duigan MLC
Minister for Sport

From: Out of Scope parliament.tas.gov.au>
Sent: Tuesday, 31 March 2026 1:41 PM
To: Minister Duigan (DPaC); Out of Scope (DPaC)
Subject: Fw: Northern Suburbs Community Recreation Hub

Please see enquiry from Jo Palmer's office regarding the Hub.

Get [Outlook for iOS](#)

From: Out of Scope parliament.tas.gov.au>
Sent: Monday, March 30, 2026 5:00:51 PM
To: Out of Scope parliament.tas.gov.au>
Subject: Northern Suburbs Community Recreation Hub

Hi Out of Scope

Following our phone conversation regarding the recreation hub:

Out of Scope a constituent from Rosevears, contacted the office with concerns about the changeroom arrangements.

Out of Scope advised that there are two large changerooms located side by side, but both are designated as unisex. He is unhappy that, after his daughters finish their PCYC session, they are required to use these shared spaces, as there is the potential for men and boys to be using the rooms at the same time.

He is unsure why the changerooms cannot simply be designated as male and female.

Can you please include our office in any correspondence you may have with Out of Scope

Thanks

Out of Scope



Out of Scope
Electorate Officer
Honourable Jo Palmer MLC
Parliament of Tasmania
Email: Out of Scope parliament.tas.gov.au
Tel: +
Mail: 236 West Tamar Highway, Riverside TAS 7250
Web: [parliament.tas.gov.au](#)



RESPECT



INTEGRITY



TRUST



INCLUSIVITY



EMPOWERMENT



COLLABORATION

From: Out of Scope [redacted] pac.tas.gov.au>
Sent: Wednesday, 1 April 2026 9:16 AM
To: Minister Duigan (DPaC)
Subject: FW: concerned mother about the all-gender facilities (toilets and changerooms) in the new Northern Community Hub [SEC=OFFICIAL]

OFFICIAL

Can you please CM and assign to MM.

Thanks

OFFICIAL

From: Out of Scope [redacted]
Sent: Tuesday, 31 March 2026 6:46 PM
To: Duigan, Nick <Nick.Duigan@dpac.tas.gov.au>
Subject: concerned mother about the all-gender facilities (toilets and changerooms) in the new Northern Community Hub

You don't often get email from Out of Scope [redacted] [Learn why this is important](#)

Dear Minister Duigan,

I am writing to you as a concerned mother regarding the new Northern sports hub. For years now my two eight-year-old daughters attended gymnastics classes at the PCYC facility, and while we are grateful for the investment in community sport and recreation and the opportunity they have been given to move to a new, upgraded facility I feel compelled to raise my concerns regarding the implementation of all-gender change rooms and toilets.

As a woman and a parent, my primary concern is the safety, privacy, and comfort of my daughters. The absence of clearly designated women-only spaces for changing has created an environment where young girls are expected to undress and prepare for activities and use the bathroom facilities during their lessons in shared spaces with individuals of all genders. This situation is not only uncomfortable for them but also raises legitimate concerns about safeguarding and appropriate boundaries.

At their age, my daughters are becoming increasingly aware of personal privacy, and it is important that facilities reflect and support that developmental need. Many parents, including myself, believe that single-sex changing areas and bathroom facilities are a basic and reasonable provision, particularly in facilities frequented by children.

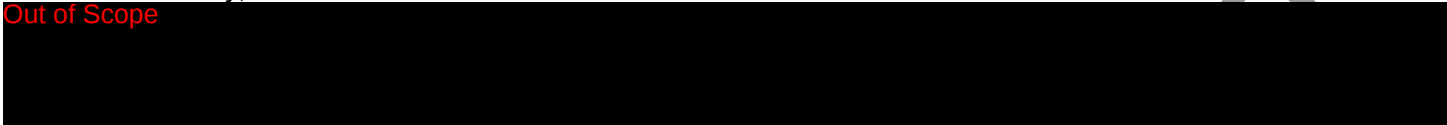
While I understand the intention to create inclusive environments, I strongly believe this should not come at the expense of the safety and dignity of women and young girls. There must be a balanced approach that accommodates inclusivity while also preserving spaces where females can feel secure and protected.

I urge you to reconsider the current design and policies in place at the Northern Sports Hub. Specifically, I would ask that the facility include clearly designated women-only change rooms and toilets, alongside any inclusive options, so that families have a choice that best suits their comfort and safety needs.

Thank you for taking the time to consider my concerns. I hope that steps can be taken to ensure that all members of our community, especially children, can participate in sport in a safe and supportive environment.

Yours sincerely,

Out of Scope



Released under RIA

From: Out of Scope [redacted] dpac.tas.gov.au>
Sent: Tuesday, 31 March 2026 10:10 AM
To: Minister Duigan (DPaC)
Subject: FW: Concerns for women and girls regarding new northern hub sports complex Launceston Tasmania [SEC=OFFICIAL]

OFFICIAL

out of scope [redacted] – for CM and MM please.
thanks

OFFICIAL

From: Out of Scope [redacted]
Sent: Tuesday, 31 March 2026 9:51 AM
To: Duigan, Nick ; senator.katy.gallagher@aph.gov.au
Subject: Concerns for women and girls regarding new northern hub sports complex Launceston Tasmania

You don't often get email from Out of Scope [redacted] [Learn why this is important](#)

Dear Minister,

I am writing to you as a concerned mother regarding the new Northern sports hub.
For years now my two daughters 9 & 10.

while we are grateful for the investment in community sport and recreation and the opportunity, I feel compelled to raise my concerns regarding the implementation of all-gender change rooms and toilets.

As a woman and a parent, my primary concern is the safety, privacy, and comfort of my daughters, stressing the comfort.

The absence of clearly designated women-only spaces for changing has created an environment where young girls are expected to undress and prepare for activities and use the bathroom facilities during their lessons in shared spaces with individuals of all genders.

This situation is not only uncomfortable for them but also raises legitimate concerns about safeguarding and appropriate boundaries.

My girls have shared with me that they will not feel safe or comfortable in this space.

At their age, my daughters are becoming increasingly aware of personal privacy, and it is important that facilities reflect and support that developmental need. Many parents, including myself, believe that single-sex changing areas and bathroom facilities are a basic and reasonable provision, particularly in facilities frequented by children. (Safeguarding is a priority).

While I understand the intention to create inclusive environments, it should not come at the expense of the safety and dignity of women and young girls.

There must be a balanced approach that accommodates inclusivity while also PRESERVING spaces where females can feel secure and protected.

I urge you to CHANGE the current design and policies in place at the Northern Sports Hub. Specifically, I would ask that the facility include clearly designated women-only change rooms and toilets, alongside any inclusive options, so that families have a CHOICE that best suits their comfort and safety needs.

I hope that steps can be taken to ensure that all members of our community, especially children, can participate in sport in a safe and supportive environment.

CURRENTLY AS IT STANDS THIS IS NOT A SAFE AND SUPPORTIVE ENVIRONMENT FOR WOMEN.

Yours sincerely,

Out of Scope

From: Out of Scope <[REDACTED]@dpac.tas.gov.au>
Sent: Monday, 30 March 2026 5:12 PM
To: Minister Duigan (DPaC)
Subject: FW: Northern sports hub [SEC=OFFICIAL]

OFFICIAL

out of scope Please CM and to MM thanks

OFFICIAL

From: Out of Scope <[REDACTED]>
Sent: Monday, 30 March 2026 4:44 PM
To: Duigan, Nick ; nick.duigan@parliament.tas.gov.au
Subject: Northern sports hub

You don't often get email from Out of Scope <[REDACTED]> [Learn why this is important](#)

Dear Minister Duigan,

I am writing to you as a concerned mother regarding the new Northern sports hub. For years now my two eight-year-old daughters attended gymnastics classes at the PCYC facility, and while we are grateful for the investment in community sport and recreation and the opportunity they have been given to move to a new, upgraded facility I feel compelled to raise my concerns regarding the implementation of all-gender change rooms and toilets.

As a woman and a parent, my primary concern is the safety, privacy, and comfort of my daughters. The absence of clearly designated women-only spaces for changing has created an environment where young girls are expected to undress and prepare for activities and use the bathroom facilities during their lessons in shared spaces with individuals of all genders. This situation is not only uncomfortable for them but also raises legitimate concerns about safeguarding and appropriate boundaries.

At their age, my daughters are becoming increasingly aware of personal privacy, and it is important that facilities reflect and support that developmental need. Many parents, including myself, believe that single-sex changing areas and bathroom facilities are a basic and reasonable provision, particularly in facilities frequented by children.

While I understand the intention to create inclusive environments, I strongly believe this should not come at the expense of the safety and dignity of women and young girls. There must be a balanced approach that accommodates inclusivity while also preserving spaces where females can feel secure and protected.

I urge you to reconsider the current design and policies in place at the Northern Sports Hub. Specifically, I would ask that the facility include clearly designated women-only change rooms and toilets, alongside any inclusive options, so that families have a choice that best suits their comfort

and safety needs.

Thank you for taking the time to consider my concerns. I hope that steps can be taken to ensure that all members of our community, especially children, can participate in sport in a safe and supportive environment.

Yours sincerely,

Out of Scope

Get [Outlook for iOS](#)

Released under RTI

Minister for Energy and Renewables
Minister for Parks
Minister for Sport



Level 1, 7-9 Franklin Wharf, HOBART TAS 7000 Australia
GPO Box 123 HOBART TAS 7001 Australia
Phone: +61 3 6165 7739
Email: minister.duigan@dpac.tas.gov.au

22nd April 2026

Out of Scope

Copy to:

The Honourable Jo Palmer MLC
C/o- **Out of Scope** parliament.tas.gov.au

Northern Suburbs Community Recreation Hub – All-Gender AmenitiesDear **Out of Scope**

Thank you for contacting the Honourable Jo Palmer's Office regarding the recently opened Northern Suburbs Community Recreation Hub (the Hub) in Mowbray, and for raising your concerns about the safety, privacy, and comfort of your daughters. The Tasmanian Government appreciates your interest in ensuring safe and appropriate community sporting facilities, particularly for young people.

I acknowledge your concerns regarding privacy, comfort, and safeguarding, especially for children of your daughters' age. These are important considerations and have been carefully taken into account in the design of the facility.

The safety of people accessing the Hub is a priority. The Hub's design is consistent with the National Construction Code 2025, which provides for all-gender facilities where fully enclosed sanitary compartments are used. This approach delivers a safe, inclusive, and operationally flexible facility for a diverse community.

Within the gymnastics area of the Hub, there are designated male and female change rooms, each of which includes a private single-user changing space for individuals who prefer not to change in front of others. These spaces are intended to provide additional privacy and comfort for users who may feel more comfortable in a separate, enclosed environment.

For the remainder of the facility, the Hub's all-gender amenities, including toilets, showers, and change rooms, have been designed as a contemporary, evidence-based response to safety and inclusion. Importantly, these amenities consist of fully enclosed, individual-use rooms with ceiling to floor doors, ensuring that no user is required to undress or use facilities in view of others.

The design follows Crime Prevention Through Environmental Design (CPTED) principles, which emphasise visibility, passive surveillance, and the elimination of isolated spaces as effective measures for reducing both the risk and fear of inappropriate behaviour. Research indicates that well-designed all-gender facilities reduces opportunities for harassment by removing concealed and unsupervised environments.

The all-gender amenities are designed to be inclusive and flexible to accommodate all people. This ensures that all members of the community have access to safe and appropriate toilet, shower, and change room facilities.

The northern suburbs of Launceston is culturally diverse, and the design has been developed with consideration of the community's varying safety, privacy, and cultural needs.

The design supports:

- Parents with children of a different gender.
- Carers assisting people with disabilities (including where the carer is of a different gender to the person with the disability).
- Families managing multiple children in a busy sporting environment.

Several accessible toilet facilities are provided throughout the building for disabled users which allow for single sex usage, or for situations where a carer is involved. These accessible toilets also include change tables for parents of babies.

Key safety and privacy features include:

- Fully enclosed, self-contained rooms for toilets, showers, and change rooms, constructed with solid masonry walls from floor to ceiling to ensure individual privacy and security. Each room opens out onto a highly visible public space supporting passive surveillance.
- Open circulation areas with clear sightlines, enabling passive supervision by staff, users, parents, and carers.
- The elimination of dead-end corridors and isolated spaces, reducing the risk of entrapment or unsupervised areas.
- Clear wayfinding, accessible pathways, and strong lighting minimising hidden or unsupervised spaces.
- Integration with surrounding activity areas, ensuring amenities remain visible and connected to the broader facility. This approach also supports anti-bullying objectives by reducing opportunities for inappropriate behaviour that can occur in concealed spaces within traditional layouts.

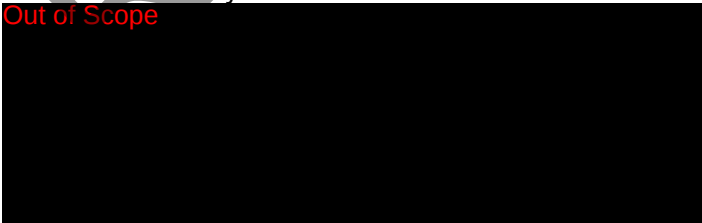
The Department of State Growth, in conjunction with the tenants, PCYC North and Northern Tasmania Netball Association (NTNA), will continue to observe and review facility use, behaviour, and community feedback to ensure the Hub maintains high standards of safety, privacy, and inclusion.

The Hub is open seven-days, between 6am – 8pm Monday to Friday, and between 8am – 5pm on weekends. People are welcome to visit at any time during these hours to view the facilities first-hand.

Thank you again for taking the time to share your concerns. The Tasmanian Government values community input and remains committed to delivering safe, inclusive, and contemporary public infrastructure.

Yours sincerely

Out of Scope



Hon Nick Duigan MLC
Minister for Sport

Minister for Energy and Renewables
Minister for Parks
Minister for Sport



Level 1, 7-9 Franklin Wharf HOBART TAS 7000 Australia
GPO Box 123 HOBART TAS 7001 Australia
Phone: +61 3 6165 7739
Email: minister.duigan@dpac.tas.gov.au

22nd April 2026

Out of Scope

Northern Suburbs Community Recreation Hub – All-Gender Amenities

Dear Out of Scope

Thank you for your email dated 30 March 2026 regarding the recently opened Northern Suburbs Community Recreation Hub (the Hub) in Mowbray, and for raising your concerns about the safety, privacy, and comfort of your daughters. The Tasmanian Government appreciates your interest in ensuring safe and appropriate community sporting facilities, particularly for young people.

I acknowledge your concerns regarding privacy, comfort, and safeguarding, especially for children of your daughters' age who are developing a stronger awareness of personal boundaries. These are important considerations and have been carefully taken into account in the design of the facility.

The safety of people accessing the Hub is a priority. The Hub's design is consistent with the National Construction Code 2025, which provides for all-gender facilities where fully enclosed sanitary compartments are used. This approach delivers a safe, inclusive, and operationally flexible facility for a diverse community.

Within the gymnastics area of the Hub, there are designated male and female change rooms, each of which includes a private single-user changing space for individuals who prefer not to change in front of others. These spaces are intended to provide additional privacy and comfort for users who may feel more comfortable in a separate, enclosed environment.

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The design supports:

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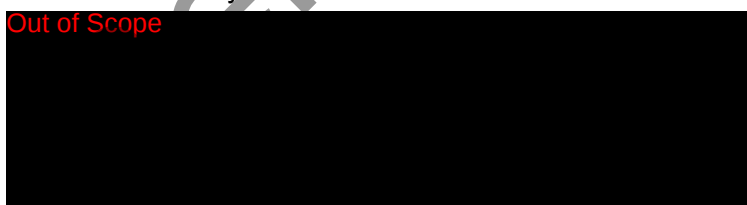
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The Hub is open seven-days, between 6am – 8pm Monday to Friday, and between 8am – 5pm on weekends. People are welcome to visit at any time during these hours to view the facilities first-hand.

Thank you again for taking the time to share your concerns. The Tasmanian Government values community input and remains committed to delivering safe, inclusive, and contemporary public infrastructure.

Yours sincerely

Out of Scope



Hon Nick Duigan MLC
Minister for Sport

CC. Hon Jo Palmer MLC, Minister for Children and Youth: minister.palmer@dpac.tas.gov.au

From: Out of Scope
Sent: Tuesday, 15 August 2023 6:22 PM
To: pdst@paraquadtas.org.au
Cc: Barber, Alex; de Out of Scope
Subject: Development of the Northern Suburbs Community Recreation Hub, 316-320 Invermay Road, Mowbray

Good evening

I am writing on behalf of Major Infrastructure Projects at Infrastructure Tasmania within the Department of State Growth and would like to inform you about the development of the Northern Suburbs Community Recreation Hub (the Hub) at Mowbray in Launceston.

The Hub is being built to address a shortage of indoor sporting facilities in Launceston and will improve access to local community, sport and recreation infrastructure and programs in the northern suburbs. By fostering inclusion and connectivity through community assets, the aim is to improve social and economic outcomes, particularly in lower socioeconomic areas. An important part of this endeavor involves the potential transition of PCYC's Newstead operations to the new Hub Mowbray facility. I understand that Physical Disability Sports Tasmania, within ParaQuad Tasmania, currently conducts a wheelchair basketball program at PCYC, and therefore I'm particularly keen to engage with you, as a user, on this exciting new development.

Infrastructure Tasmania in conjunction with our architect, Philp Lighton Architects (PLA), has been actively progressing the Hub Project to facilitate the necessary construction works to deliver the Hub. We are currently at the design phase of the project and plan to undertake some early works in the coming months.

In light of seeking to ensure the Hub's accessibility for everyone, I would like to extend an invitation for a presentation of the Hub's design to Physical Disability Sports Tasmania, in particular the accessibility aspects of the development, to ensure that your organisation's requirements have been thoughtfully considered. Your insights and perspectives are invaluable in shaping this inclusive project.

Further information about the Hub Project can be found on our website:

[https://www.stategrowth.tas.gov.au/Transport and Infrastructure/infrastructure tasmania/major projects/northern suburbs community recreation hub nscrh](https://www.stategrowth.tas.gov.au/Transport%20and%20Infrastructure/infrastructure%20tasmania/major%20projects/northern%20suburbs%20community%20recreation%20hub%20nscrh)

I look forward to the opportunity to share our progress and receive your input.

Regards

Out of Scope

Infrastructure Tasmania | Department of State Growth
Level 1, 2 Salamanca Square, Battery Point TAS 7000 | GPO Box 536, Hobart TAS 7001
Mobile: Out of Scope
www.stategrowth.tas.gov.au

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Building Solutions

Performance Based Design Report

316-320 Invermay Road, Mowbray, TAS

Project No: 204475-S
Date: 30/11/2023
Revision: 0

Document Control

Document Title: Building Solutions – Performance Based Design Report

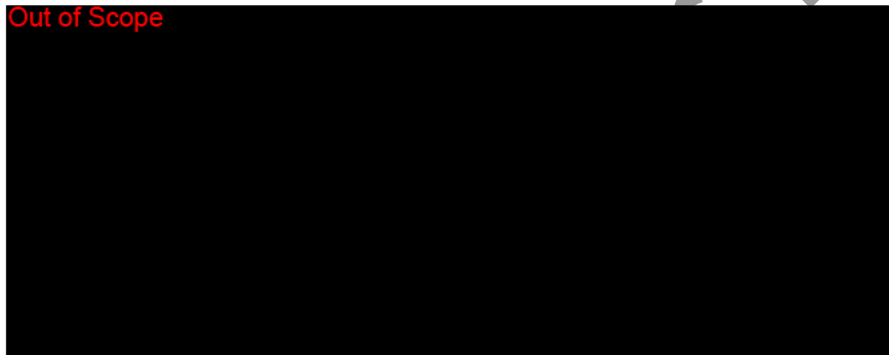
Project Address: 316-320 Invermay Road, Mowbray, TAS

Project No: 204475-S

Prepared For: PhilpLighton Architects (Hobart)

Prepared By: DDEG (Solutions)
ABN: 15 654 057 477
Level 2, 162 Macquarie Street
Hobart, TAS 7050
03 8814 3218

Authorised by: Out of Scope



Revision History

Doc.	Rev.	Date	Purpose	Prepared by:	Reviewed by:
PBDR	0	30/11/2023	For Construction	Out of Scope	

Executive Summary

PhilpLighton Architects (Hobart) has appointed DDEG (Solutions) to undertake an evaluation for 316-320 Invermay Road, Mowbray, TAS.

This Performance Based Design Report evaluates the proposed performance provisions against the National Construction Code (NCC), Building Code of Australia (BCA) 2019 Volume 1 Amendment 1 Performance Requirements. Other aspects of the building related to design and construction not specifically addressed in this report are outside the scope of this report.

The design team have elected to adopt the Performance Solution summarised in the table below:

Table 1 Proposed Performance Solution and Reference Criteria

Proposed Performance Solution	Building Code of Australia	
	DTS Provision	Performance Requirement
To provide technical justification that rationalises the use of unisex sanitary facilities and showers for the calculation of occupant numbers.	F2.2, F2.3	FP2.1

The proposed Performance Solution has been evaluated and it is our considered opinion that the building design meets the BCA Performance Requirements with the inclusion of the following specification of required performance measures:

Table 2 Specification of Required Performance Measures

System	Performance Standard
Construction Requirements	The proposed building will have all sanitary facilities and showers to be unisex, in lieu of the requirements of DTS F2.3(a) to provide separate facilities for male and females. The total proposed sanitary facilities including accessible unisex accessible and ambulant sanitary compartments and showers will consist of the following: 33 closet pans 44 washbasins 12 showers

Other than the abovementioned requirements and the specifically addressed deviations from the BCA DTS Provisions in this report, it is assumed that all other parts of the building will be provided and maintained as required by the BCA DTS Provisions.

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1 Introduction

1.1 Purpose

PhilpLighton Architects (Hobart) has appointed DDEG (Solutions) to undertake an evaluation for 316-320 Invermay Road, Mowbray, TAS.

This Performance Based Design Report evaluates the proposed performance provisions against the National Construction Code (NCC), Building Code of Australia (BCA) 2019 Volume 1 Amendment 1 Performance Requirements. Other aspects of the building related to design and construction not specifically addressed in this report are outside the scope of this report.

This report is only to be used for 316-320 Invermay Road, Mowbray, TAS with the design as described in the referenced documentation. The report is not to be used to support any other design scheme as changes to the design may affect the evaluation. DDEG (Solutions) takes no responsibility for any issues associated with the misuse of this report.

1.2 Relevant Legislation

The primary legislation applicable to the development is the Building Code of Australia (BCA) 2019 Volume 1 Amendment 1 (ABCB, 2020).

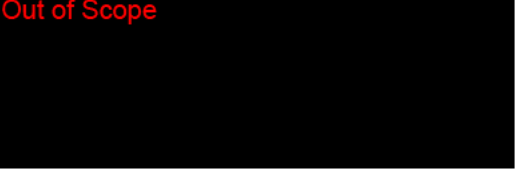
The BCA provides a set of Performance Requirements which must be complied with. The prescriptive deemed-to-satisfy (DTS) Provisions are also described in the BCA. A design that complies with the DTS Provisions is deemed to comply with the Performance Requirements. A Performance Solution is a design that does not comply with the DTS Provisions however is shown to comply with the Performance Requirements by way of an evaluation.

The evaluation of a proposed Performance Solution can be undertaken using a variety of methods. These are defined in Clause A2.2(2) of the BCA. One or more, or a combination of these methods are adopted to determine whether the proposed Performance Solution complies with the Performance Requirements of the BCA. The relevant Performance Requirements are determined in accordance with Clause A2.2(3) of the BCA. Compliance with Performance Requirements is undertaken in accordance with Clause A2.2(1) of the BCA.

1.3 Reference Documentation

The report is based on information contained in the following documents and drawings:

Table 3 Reference Documentation

Document	Prepared by	Issue
<u>Fee Request Email</u> Out of Scope  Subject: 008.22130 NWRH HVAC Replacement UNISEX SANITARY & HEARING AUGMENTATION PERFORMANCE SOLUTIONS	Out of Scope PhilpLighton Architects	Tue 26/09/2023 03:39 PM
<u>Additional Information Email</u> Out of Scope  Subject: RE: DDEG (Solutions) - 204475-S: 316-320 Invermay Road, Mowbray TAS	Out of Scope PhilpLighton Architects	Fri 27/10/2023 04:44 PM
<u>Architectural Drawings</u> Design Development - Preliminary. Project Number: 018.21184 Drawing A0501 Rev I <i>Floor Plan Overall – Stage 2</i>	PhilpLighton Architects	06/11/2023

1.4 Project Stakeholders

The project stakeholders are listed in the table below:

Table 4 Design Team Stakeholders

Contact	Organisation	Role
out of scope	PhilpLighton Architects (Hobart)	Client/Architect
Alex Barber	Department of State Growth Tasmania	Owner
out of scope	DDEG (Solutions)	Building Consultant

1.5 Project Referral Authorities

The project's referral authorities are listed in the table below:

Table 5 Referral Authorities

Contact	Organisation	Role
Out of Scope	Pitt & Sherry Building Surveying	Relevant Building Surveyor

1.6 Report Limitations

The following limitations are applicable with respect to the advice presented in this report:

- DDEG (Solutions) has prepared this document for the sole use of the nominated stakeholders and referral authorities, and for the specific purpose expressly stated in the document. No other party should rely on this document without the prior written consent of DDEG (Solutions). DDEG (Solutions) undertakes no duty, nor accepts any responsibility, to any third party who may rely upon or use this document.
- The information contained in this document provides advice specific to those areas of the building contained within Table 1. No claims are made, and no liability is accepted in respect of design and construction issues falling outside areas specifically addressed within this report.
- The report is limited to the assessment of proposed Performance Solutions for the BCA DTS variations identified in this report for compliance with relevant BCA Performance Requirements. Other aspects of the building related to design and construction not specifically addressed in this report are outside the scope of this report.
- Reports marked 'Not for Construction' or 'Draft' may be subject to change and are not released as final reports. DDEG (Solutions) accepts no liability pending release of the final version of the report.
- In preparing this document DDEG (Solutions) may have relied upon information provided by the client and other third parties. DDEG (Solutions) accepts no responsibility or liability for any errors or omissions which may be incorporated into this document as a result.
- The recommendations, data and methodology documented in this assessment are based on the listed reference documentation. The recommendations apply specifically to the project under consideration and must not be utilised for any other purpose. Any modifications or changes to the project from that described in the listed reference documentation may invalidate the advice provided in this document, necessitating a revision.
- Subject to the above conditions, this document may be transmitted, reproduced or disseminated only in its entirety.
- Changes in design or construction of the product(s) or building use, non-complying building elements not within the scope of this report, building and product defects, changes or amendments in the Standard(s) which form the basis for documenting compliance with the Performance Requirements, variations and differences in site conditions, building use, product selection, quality and material fatigue and management and staff policies, procedures may render this report invalid.

2 Principal Building Characteristics

The building characteristics described below are informative only. The information is based on referenced documentation and is current at the time of writing this report. It is not intended to restrict or limit the design and is subject to clarification or change as the design develops.

It is the responsibility of the design team and building surveyor to ensure compliance with all parts of the BCA AC Provisions except where described as a proposed Performance Solution in this report or where other dispensations have been granted. A consolidated set of design criteria for design guidance is described in the Executive Summary.

2.1 Building Characteristics

The project comprises a sporting venue.

Table 6 Building Parameters

BCA Parameter	
Occupancy	Sporting Venue
BCA Classification	Class 9b (Sport)
Rise in Storeys	1
Number of Storeys Contained	1

The building will be located at 316-320 Invermay Road, Mowbray, TAS, and the floor plan is shown in the figure below.

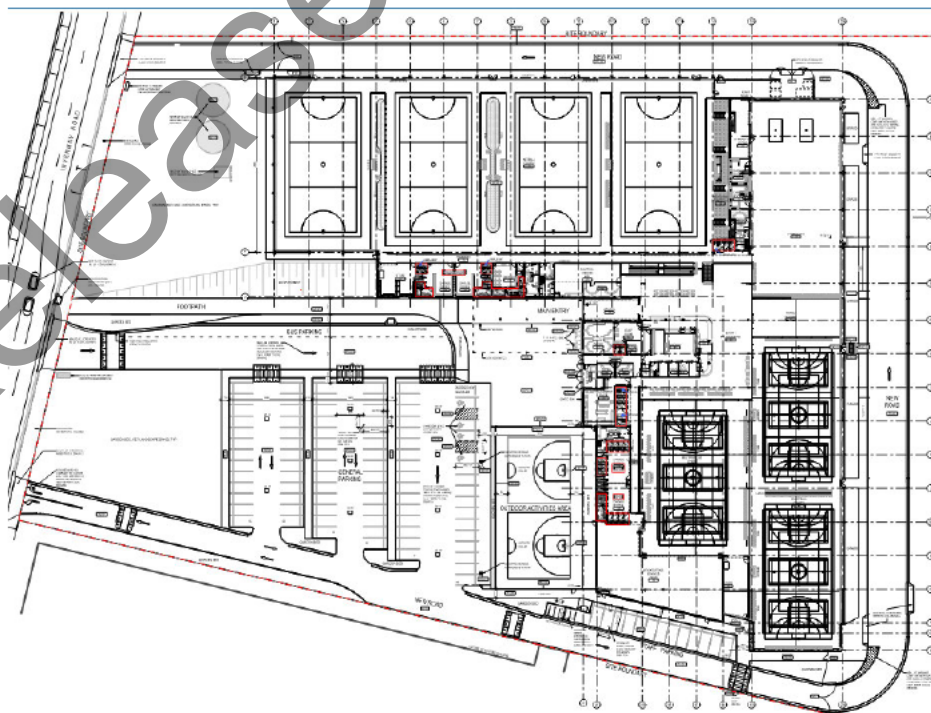


Figure 1 Overall Floor Plan

3 Performance Evaluation

3.1 Performance Solution – Unisex Sanitary Facilities and Showers

3.1.1 Introduction

The following table briefly describes the proposed Performance Solution, the relevant BCA DTS Provision and Performance Requirement.

Table 7 Proposed Performance Solution and Reference Criteria

Proposed Performance Solution	Building Code of Australia	
	DTS Provision	Performance Requirement
To provide technical justification that rationalises the use of unisex sanitary facilities and showers for the calculation of occupant numbers.	F2.2, F2.3	FP2.1

The proposed Performance Solution is to provide the technical justification to support unisex sanitary facilities and showers for the calculation of occupant numbers. The proposed building will have unisex sanitary facilities and showers in lieu of separate male and female facilities required under DTS Provision F2.3 (a) of the NCC 2019 Volume 1 Amendment 1.

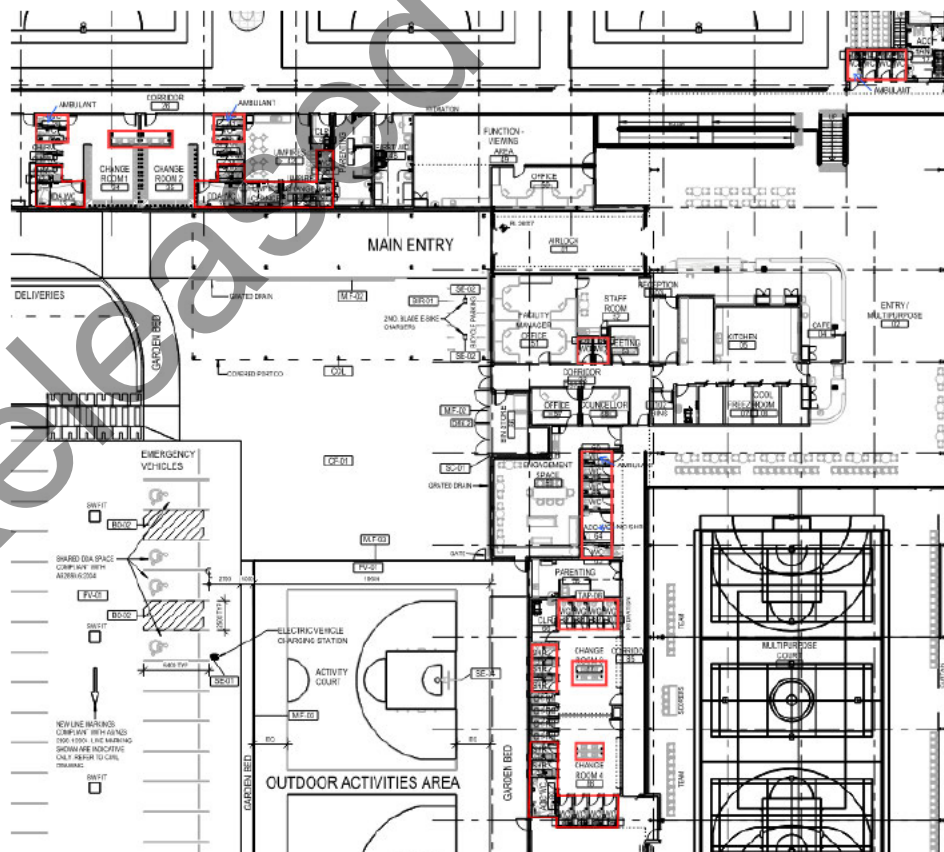


Figure 2 Locations of Proposed Sanitary Facilities (Markup in Red)

3.1.2 Intent of the BCA

DTS Provision F2.3 (a) stipulates that for Class 3 to 9 buildings, separate sanitary facilities for males and females must be provided in accordance with DTS Table F2.3.

It can be inferred the provision of separate male and female sanitary compartments is to provide privacy between men and women while using toilets, and to ensure that sanitary facilities are provided suitable to the function and use of the building. However, where the occupant numbers within a building are low or where the intention of the environment is to allow greater flexibility in the use of toilets, there is no requirement for separate male and female sanitary compartments.

Performance Requirement FP2.1 specifies that:

Suitable sanitary facilities for personal hygiene must be provided in a convenient location within or associated with a building, to the degree necessary, appropriate to—

- (a) the function or use of the building; and*
- (b) the number and gender of the occupants; and*
- (c) the disability or other particular needs of the occupants.*

3.1.3 Approach

Under Section A2.2 of the BCA, a Performance Solution is achieved by demonstrating:

- (a) compliance with all relevant Performance Requirements; or*
- (b) the solution is at least equivalent to the Deemed-to-Satisfy Provisions.*

Furthermore, a Performance Solution must be shown to comply with the Performance Requirements through one or a combination of the following Assessment Methods:

- (a) Evidence of suitability in accordance with Part A5 that shows the use of a material, product, plumbing and drainage product, form of construction or design meets the relevant Performance Requirements.*
- (b) A Verification Method including the following:*
 - (i) The Verification Methods provided in the NCC.*
 - (ii) Other Verification Methods accepted by the appropriate authority that show compliance with the relevant Performance Requirements.*
- (c) Expert Judgement.*
- (d) Comparison with the Deemed-to-Satisfy Provisions.*

The method of approach for this Performance Solution is outlined in the flowchart below.

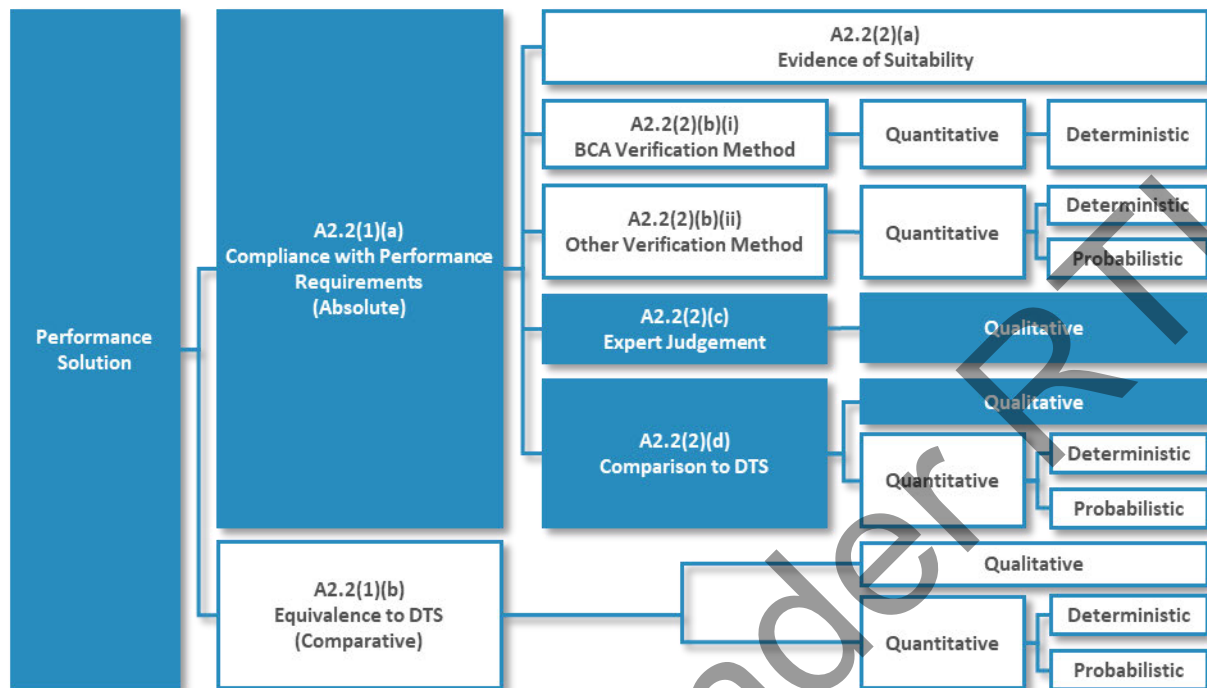


Figure 3 Method of Approach

3.1.4 Design Criteria

The proposed building will have all sanitary facilities and showers to be unisex, in lieu of the requirements of DTS F2.3(a) to provide separate facilities for male and females.

The total proposed sanitary facilities including accessible unisex accessible and ambulant sanitary compartments and showers will consist of the following:

- 33 closet pans
- 44 washbasins
- 12 showers

3.1.5 Method of Evaluation

The method of evaluation will include:

- An Expert Judgement on the provision of unisex facilities in lieu of separate facilities within the building with consideration given to adopt inclusivity of all genders.
- A qualitative and comparative evaluation will be undertaken comparing the proposed design with a comparable design that fully complies with the BCA DTS Provisions.

3.1.6 Design Scenario

3.1.6.1 Comparison to DTS Provisions

The proposed Performance Solution will be compared with a comparable design that fully complies with the DTS Provisions. The comparable BCA DTS compliant design will be a building with the same class, use, number of levels and population (Population characteristics) as the proposed Performance Solution except:

- Sanitary facilities will be provided in accordance with DTS Provision F2.3(a), Table F2.3.

3.1.7 Acceptance Criteria

The acceptance criterion is that the provision of unisex sanitary facilities and showers is deemed reasonable for the occupants accommodated.

3.1.8 Evaluation

DTS Provision F2.3(a) stipulates that for Class 3 to 9 buildings, separate sanitary facilities for males and females must be provided in accordance with Table F2.3.

In the comparable design, the building will be provided with an adequate number of sanitary facilities for the number of occupants in the building, in accordance with DTS Table F2.3. Under this design, male and female employees would be provided with separate sanitary facilities.

In addition, a DTS design would also require unisex accessible sanitary facilities which may be counted once for each sex as per DTS Provision F2.2(c).

Table 8 BCA 2019 Volume 1 Amendment 1 Table F2.3 (ABCB, 2020)

User Group	Closet Pans		Urinals		Washbasins	
	Design Occupancy	Number	Design Occupancy	Number	Design Occupancy	Number
Class 3, 5, 6 and 9 other than schools						
Male employees	1-20	1	1-10	0	1-30	1
	>20	Add 1 per 20	11-25	1	>30	Add 1 per 30
			26-50	2		
			>50	Add 1 per 50		
Female employees	1-15	1	N/A	N/A	1-30	1
	>15	Add 1 per 15			>30	Add 1 per 30
Class 9b – sports venues or the like						
Male participants	1-20	1	1-10	1	1-10	1
	>20	Add 1 per 20	>10	Add 1 per 10	>10	Add 1 per 10
Female participants	1-10	1	N/A	N/A	1-10	1
	>10	Add 1 per 10			>10	Add 1 per 10
Male spectators or patrons	1-250	1	1-100	1	1-150	1
	250-500	2	>100	Add 1 per 100	>150	Add 1 per 150
	>500	Add 1 per 500				
	1-15	1	N/A	N/A	1-60	1
	16-60	2			61-200	2

User Group	Closet Pans		Urinals		Washbasins	
	Design Occupancy	Number	Design Occupancy	Number	Design Occupancy	Number
Female spectators or patrons	61-120	3			201-350	3
	>120	Add 1 per 70			>350	Add 1 per 150

As per DTS Provision F2.2(c), in calculating the number of sanitary facilities, a unisex facility required for people with a disability may be counted once for each sex. The unisex accessible sanitary facility within the building will be counted once for each sex in determining the design occupancy of the building. Furthermore, as per DTS Provision F2.3(h)(i), one shower must be provided to Class 9b sporting venues for each 10 participants to ensure that participants can maintain hygiene and recovery after sporting activities.

In the Performance Solution design, the proposed building will accommodate a total number of 794 occupants and will be provided with unisex sanitary facilities and showers to accommodate for this number. The total number of proposed unisex sanitary facilities will contain 25 closet pans, 36 washbasins and 8 showers. With the inclusion of unisex accessible and ambulant sanitary facilities, the proposed sanitary facilities will contain 33 closet pans, 44 washbasins and 12 showers, which can be shown in Figure 4 below that refers to the amenities analysis provided in accordance with the NCC requirements.

User Group	Design Occupancy	NCC Requirements				Proposed		
		Pan	Urinal	Wash	Shower	Pan	Wash	Shower
Male Employees	39	2	2	2				
Female Employees	39	3		2				
Male Spectators or Patrons	300	2	3	2				
Female Spectators or Patrons	300	6		3				
Male Participants	58	3	6	6	6			
Female Participants	58	6		6	6			
Unisex						25	36	8
Totals	794	22	11	21	12	25	36	8
Total pans in lieu of urinals		33						
NCC required total number of accessible unisex sanitary compartments (doubled for Male & Female)								4
Additional number of non required accessible unisex sanitary compartments (not doubled for Male & Female)								4
NCC required total number of ambulant sanitary compartments								4
Proposed total number of ambulant sanitary compartments								4
NCC required total number of accessible unisex showers								2
Proposed total number of accessible unisex showers								4
Proposed Totals (Including accessible unisex sanitary compartments & showers)						33	44	12

Figure 4 Amenities Analysis

Assuming majority of the occupants to be catered for are of one gender, the provision of separate sanitary facilities will not be able to cater for the occupants due to the constraint of privacy for

separate genders, therefore the inclusion of unisex facilities provides additional sanitary spaces for the occupants. Based on Figure 4 above, the unisex sanitary facilities and showers would be able to support the proposed number of occupants as the proposed number of sanitary facilities would be equivalent to the requirements stipulated by the BCA. It is noted that while no urinals will be provided, the male closet pan and washbasin is equivalent to providing a female closet pan and washbasin, thus providing an occupancy for male occupants. Furthermore, the unisex sanitary facilities can serve as a urinal, contributing to the rationalisation of the occupant numbers. This in turn reinforces the capacity of the sanitary facilities to accommodate for the occupants in the building and improve space efficiency that could potentially reduce construction and maintenance costs for maintaining urinals as there will be no need for separate cleaning for male and female areas.

By proposing all sanitary facilities and showers to be unisex, the Performance Solution design prioritizes inclusivity, creating a more welcoming environment for individuals of diverse gender identities which promotes privacy and dignity for all users. According to studies pertaining the use of gender-neutral sanitary facilities, it was found that gender neutral facilities reduce anxiety and stress for people with non-conforming genders thus providing a safe and private space to use the space (Behavioural Public Policy, 2020). The shift to unisex facilities aligns with evolving societal attitudes towards gender, challenging stereotypes and fostering equality thereby eliminating the need for gender specific spaces. Given the nature and size of the building, the proposed unisex sanitary facilities can potentially minimize wait times as sanitary facilities are considered a shared space for all users to use regardless of gender. Furthermore, the unisex sanitary facilities can accommodate for children with accompanying parents or guardians, to be able to use the facilities without being restricted to gender-specific facilities and increase safety for families who may be concerned about the security of their children in public facilities. As part of the implementation of unisex sanitary facilities, it is important to indicate clear signage to identify the location of the unisex facilities and avoid gender-specific symbols to promote inclusivity for all users, such as figure below for example.

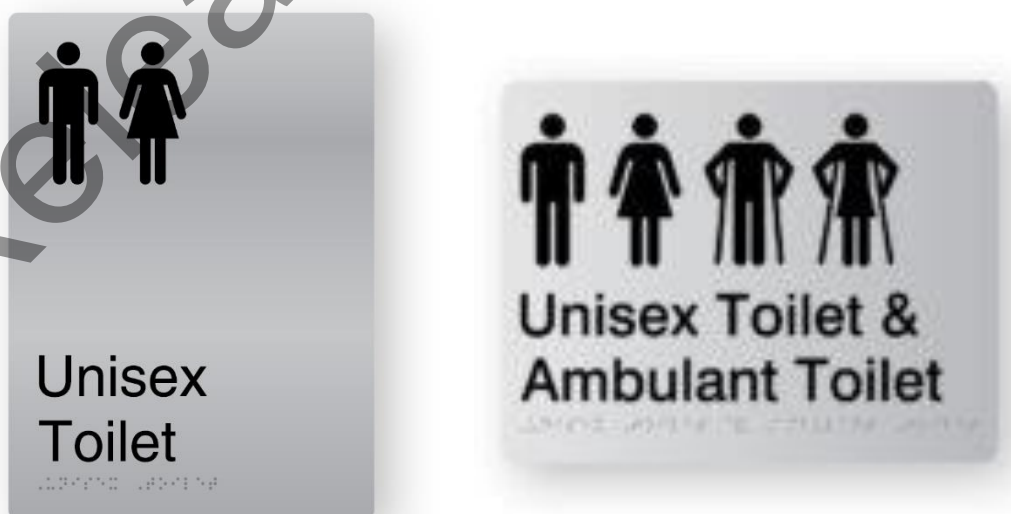


Figure 5 Examples of Unisex Sanitary Facilities Signage

Therefore, through consideration of the number of occupants that the sanitary facilities will support and the function and use of the building, the proposed unisex sanitary facilities provided can be deemed reasonable for the occupants accommodated. The proposed Performance Solution therefore satisfies the acceptance criterion.

3.1.9 Conclusion

The evaluation undertaken above has determined that the provision of unisex sanitary facilities is deemed reasonable for the occupants accommodated with consideration to create an inclusive environment for all genders. It is our considered opinion that the Performance Solution satisfies Performance Requirements FP2.1 to the degree necessary.

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4 References

ABCB. (2020). *National Construction Code Series Volume 1 Amendment 1 - Building Code of Australia 2019*. Canberra: Australian Building Codes Board.

Behavioural Public Policy. (2020). *The gender-neutral bathroom: A new frame and some nudges*. Behavioral Public Policy.

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