



Morris Goding
Access Consulting

Integrated Projects

Project Francis

**Access Review -
Final**

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1. Executive Summary

The Access Review Report is a key element in the design development of Project Francis located within The Star, Pyrmont and an appropriate response to the AS1428 series, Building Code of Australia (BCA), DDA Access to Premises Standards (including DDA Access Code) and ultimately the Commonwealth Disability Discrimination Act (DDA).

Morris-Goding Accessibility Consulting has prepared the Access Report to provide advice and strategies to maximise reasonable provisions of access for people with disabilities.

The review will ensure that ingress and egress, paths of travel, circulation areas, theatre provisions and sanitary facilities comply with relevant statutory guidelines, and in addition, compliance with a higher level of accessibility and inclusiveness benchmarks set by the project.

2. Introduction

2.1 Background

Integrated Projects has engaged Morris-Goding Access Consulting to provide a design review of Project Francis, located within The Star in Pyrmont. The project encapsulates a refurbishment of the existing 4000 seat event centre into a two-theatre complex.

The proposed development falls under the BCA classification:

- Class 9b (theatre)

The requirements of the investigation are to:

- Review supplied drawings of the proposed development;
- Provide a report that will analyse the provisions of disability design of the development, and
- Recommend solutions that will ensure the design complies with the Disability Discrimination Act (DDA), Building Code of Australia (BCA), relevant Australian Standards, and enhanced benchmark requirements set by the project.

2.2 Objectives

The Report seeks to ensure compliance with statutory requirements and enhanced benchmark requirements set by the project. The Report considers user groups, who include students, staff, and members of the public. The Report attempts to deliver equality, independence and functionality to people with a disability inclusive of:

- People with a mobility impairment (ambulant and wheelchair);
- People with a sensory impairment (hearing and vision); and
- People with a dexterity impairment

The Report seeks to provide compliance the Disability Discrimination Act 1992. In doing so, the report attempts to eliminate, as far as possible, discrimination against persons on the ground of disability.

2.3 Limitations

This report is limited to the accessibility provisions of the building in general. It does not provide comment on detailed design issues, such as: internals of accessible/ambulant toilet, fit-out, lift specification, slip resistant floor finishes, door schedules, hardware and controls, glazing, luminance contrast, stair nosing, TGSIs, handrail design, signage etc. that will be included in construction documentation.

2.4 Accessibility of Design

The proposed design will utilise the Federal Disability Discrimination Act (DDA), Disability (Access to Premises – Buildings) Standards 2010, BCA/DDA Access Code, Universal Design principles, the AS 1428 Series, and other design guidelines, to develop appropriate design documentation, to provide reasonable access provisions for people with disabilities.

The Project Architect and an appropriately qualified accessibility consultant will examine key physical elements during design development stage, to identify physical barriers and incorporate solutions as a suitable response to disability statutory regulations and other project objectives.

The design will be developed to ensure the principles of the DDA are upheld. Under the DDA, it is unlawful to discriminate against people with disabilities in the provision of appropriate access, where the approach or access to and within a premise, makes it impossible or unreasonably difficult for people with disabilities to make use of a particular service or amenity.

The design will comply with the requirements of the DDA Access to Premises Standards and include requirements for accessible buildings, linkages and the seamless integration of access provisions compliant with AS1428.1. The developed design will consider all user groups, who include members of the public, visitors, students and staff members.

2.5 Statutory Requirements

The statutory and regulatory guidelines to be encompassed in the developed design to ensure effective, appropriate and safe use by all people including those with disabilities will be in accordance with:

- Federal Disability Discrimination Act (DDA);
- Disability (Access to Premises – Buildings) Standards 2010;
- Building Code of Australia (BCA) Part D3, F2, E3;
- AS 1428.1:2009 - (General Requirement of Access);
- AS 1428.4.1:2009 - (Tactile Ground Surface Indicators);
- AS 2890.6:2009 - (Parking for People with Disabilities);
- AS 1735.12:1999 - (Lift Facilities for Persons with Disabilities);
- City of Sydney DCP

Please note that there are also additional advisory standards (not currently referenced by BCA or DDA Premises Standards) as well as other relevant guidelines that will be considered, as relevant to promote equity and dignity in line with over-arching DDA principles and aspirational objectives. These include:

- Universal Design Principles;
- Human Rights Commission (HEREOC)
- Advisory Note February 2013 on streetscape, public, outdoor areas, fixtures, fittings and furniture;
- AS1428.2:1992 Enhanced and Additional requirements;
- AS1428.4.1 Draft Way-finding Standard;

- AS3745:2010 – Planning for Emergencies in Facilities (to assist with design strategies for provision for escape for people with disability that may require assistance)

3. General Access Planning Considerations

The Disability Discrimination Act 1992 (DDA) is a legislative law that protects the rights of all people. The Act makes disability discrimination unlawful and promotes equal rights, equal opportunity and equal access for people with disabilities. The Australian Human Right Commission is the governing body who control and enforce DDA compliance.

Nevertheless, building elements that provide insufficient accessible provisions for people with disabilities remain subject to the DDA. The improvement of non-compliant building elements and areas to meet current access requirements will mitigate the risk of a DDA complaint be made against the building owner.

Since the 1st May 2011, the Commonwealth's Disability (Access to Premises – Buildings) Standards 2010 (DDA Premises Standards) apply to all new building works and to affected parts of existing buildings.

The DDA Premises Standards' requirements (DDA Access Code) are mirrored in the access provisions of the BCA. New building work and affected parts must comply with the DDA Premises Standards and AS1428.1-2009 in the same manner as they would comply with the BCA by meeting deemed-to-satisfy provisions or by adopting an alternative solution that achieves the relevant performance requirements.

By utilizing AS 1428 suite of Standards, the overall aim is to provide continuous accessible paths of travel to connect the proposed development to and through public domain areas and between associated accessible buildings in accordance with the DDA Access Code.

MGAC supports the use and consideration of universal design (UD) principles into the design to maximize access for all people. We will assist the design team to incorporate UD principles where possible within the project, while still meeting mandatory compliance requirements.

A UD approach has numerous benefits for the client as an education provider, for businesses within the building, for individual users and for society in general. An inclusive environment that can be accessed, understood and used by as many people as possible, is good business sense, is more sustainable and is socially progressive, in line with the aims of the DAP.

Universal design principles consider the needs of a broad range of people including older people, families with children and pushing prams, people from other cultures and language groups, visitors in transit and people with disability. By considering the diversity of users, the design will embed access into and within it, so that benefits can be maximized, without adding on specialized 'accessible' features that can be costly, visually unappealing and may perpetuate exclusion and potential stigma.

The seven key Universal design principles to consider in the on-going design include:

- Principle 1: Equitable Use
- Principle 2: Flexibility in Use
- Principle 3: Simple and Intuitive Use
- Principle 4: Perceptible Information



- Principle 5: Tolerance for Error
- Principle 6: Low Physical Effort
- Principle 7: Size and Space for Approach and use

4. Ingress & Egress

4.1 External Linkages/Entrances

The BCA and DDA Premises Standards contain requirements for site approaches for the use of persons with disabilities. These requirements can be summarised as follows:

- It will be necessary to provide an accessible path of travel from main pedestrian entry points at the site allotment boundary to all building entrances compliant with AS1428.1:2009.
- An accessible path of travel between buildings (or parts of buildings) that are connected by a pedestrian linkage, within the site allotment boundary, compliant with AS1428.1:2009 is also required.

Assessment

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements.

Existing linkages by stair and lift are provided to and into the new works. These linkages are subject to the affected part clause of the DDA Premises Standards, however they appear to show compliant access provisions to satisfy this requirement.

On the basis of the current level of detail all access requirements appear capable of achieving compliance. Further work will be required during design development stage to ensure appropriate outcomes are achieved.

4.2 Emergency Egress

BCA 2016 Part D2.17 has requirements for all fire-isolated egress stairs from areas required to be accessible (not communication stairs) to include at least one continuous handrail designed to be compliant with AS1428.1 Clause 12. Provision of an off-set tread at the base of stair flights or an extended mid-landing that will allow a 300mm extension clear of egress route is considered appropriate for achieving a consistent height handrail (without vertical or raked sections). Such an off-set tread configuration has been shown at all stairs.

Where fire-isolated egress stairs will also be used for communication stair purposes between levels, they should be designed to meet AS1428.1:2009. Confirmation is required on the likely use of certain stairs for this purpose.

There is currently no mandatory requirement within BCA or DDA Premises Standards for provision of independent accessible egress for people with a disability in accordance AS1428.1 and this remains an important DDA issue. Consideration of an accessible egress strategy with emergency evacuation plan will be needed as a minimum starting point.

5. Paths of Travel

5.1 Circulation Areas

The BCA and DDA Premises Standards contain requirements for circulation areas for the use of persons with disabilities. These requirements can be summarised as follows:

- Wheelchair passing bays (1800mm width x 2000 length) are also required when a direct line of sight is not available and are to be provided at 20m max. intervals along access-ways.
- Turning spaces (at least 1540mm W x 2070mm L) are required within 2m of every corridor end and at 20m.max intervals along all access-ways. This is needed for wheelchairs to make a 180 degree turn, compliant with AS1428.1:2009.
- All common-use doors (i.e. not excluded under Part D3.4) to have 850mm min. clear width opening (each active door leaf) and suitable door circulation area, compliant with AS1428.1:2009.
- All common-use corridors and accessible paths of travel to be at least 1000mm min. width when travelling in linear direction. Note: Increased clear width paths of travel required for doorway circulation, turning areas etc.

Assessment

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements.

Suitable circulation has been provided in all access pathways leading to areas required to be accessible. There are min. 1540mm x 2070mm turning spaces at all corridor ends and min. 1800mm x 2000mm passing spaces where there is no direct line of sight for wheelchair users to pass each other.

A majority of doors show suitable 850mm clear width and appropriate door circulation compliant with AS1428.1. There are some doors that do not have appropriate door width/circulation, however these doors lead to areas that can be exempted under BCA Clause D3.4 due to the nature of activities within these rooms and the able bodied requirements of the staff accessing them (e.g. candy bar, control room, laundry and wardrobe, tech rooms etc).

On the basis of the current level of detail all access requirements appear capable of achieving compliance. Further work will be required during design development stage to ensure appropriate outcomes are achieved.

5.2 Passenger Lifts

The BCA and DDA Premises Standards contain requirements for passenger lifts and circulation areas for the use of persons with disabilities. These requirements can be summarised as follows:

- Passenger lifts to have min. internal size at floor of 1400mm width x 1600mm depth, compliant with BCA/DDA Access Code Part E3.6 and AS1735.12.

- All lift lobbies and main corridors on each level to have 1800mm min. clear width to allow two wheelchairs ability to space pass each other.

Assessment

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements.

The existing lifts will be utilised to provide the accessible path of travel between the levels of new works. The lifts should be assessed to ensure current codes are met, however from the drawings available they appear to be capable of achieving compliance.

On the basis of the current level of detail all access requirements appear capable of achieving compliance. Further work will be required during design development stage to ensure appropriate outcomes are achieved.

5.3 Stairs & Ramps

The BCA and DDA Premises Standards contain requirements for stairs and ramps for the use of persons with disabilities. These requirements can be summarised as follows:

- Ramps are to have maximum 1:14 gradient with landings at no more than 9 metre intervals
- Ramps are to have handrails on both sides with minimum 1 metre clearance in accordance with AS1428.1
- Landings are to have 1200mm length with 1500mm length at 90 degree turns
- Stairs are to have handrails on both sides in accordance with AS1428.1
- Stairs and ramps are to be offset to ensure no encroachment of handrail extensions into from transverse path of travel at top and bottom of stair/ramp

Assessment

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements.

All stairs and ramps have provision for suitable landings, handrails and TGSIs as necessary under AS1428.1 and AS1428.4.1. While handrails, slip resistant nosings and TGSIs are yet to be detailed, compliance with AS1428.1 and AS1428.4.1 is readily achievable within the areas allocated.

On the basis of the current level of detail all access requirements appear capable of achieving compliance. Further work will be required during design development stage to ensure appropriate outcomes are achieved.

6. Theatres

6.1 Hearing Augmentation

The BCA and DDA Premises Standards contain requirements for hearing augmentation for the use of persons with disabilities. These requirements can be summarised as follows:

- A hearing augmentation system must be provided where an inbuilt amplification system, other than one used only for emergency warning, is installed:
 - o In a room in a Class 9b building; or
 - o In an auditorium, conference room, meeting room or room for judicatory purposes; or
 - o At any ticket office, teller's booth, ,reception area or the like, where the public is screened from the service provider

Assessment

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements.

The theatre and live room both constitute spaces that will require hearing augmentation under the BCA. The associated waiting spaces throughout the proposal will also require hearing augmentation if inbuilt amplification is installed in those areas. This will be developed further in along in the design development phase and will be fully incorporated in line with the BCA and the DDA Premises Standards.

On the basis of the current level of detail all access requirements appear capable of achieving compliance. Further work will be required during design development stage to ensure appropriate outcomes are achieved.

6.2 Wheelchair Seating Spaces

The BCA and DDA Premises Standards contain requirements for wheelchair seating spaces for the use of persons with disabilities. These requirements can be summarised as follows:.

- Where fixed seating is provided in a Class 9b assembly building, wheelchair seating spaces complying with AS1428.1 must be provided.
- The number and grouping of wheelchair seating spaces must be in accordance with BCA Table D3.9.
- There must be accessible paths of travel leading to and into the wheelchair seating spaces compliant with BCA and AS1428.1.

Assessment

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements.

The drawings allocate wheelchair seating spaces in Row K of the theatre stalls and in the fourth row of the live room. These proposed wheelchair seating spaces are allocated with as removable seating within the seating rows, which is acceptable under the DDA Premises Standards.

On the basis of the current level of detail all access requirements appear capable of achieving compliance. Further work will be required during design development stage to ensure appropriate outcomes are achieved.

7. Facilities & Amenities

7.1 Sanitary Facilities

The BCA and DDA Premises Standards contain requirements for sanitary facilities suitable for the use of persons with disabilities. These requirements can be summarised as follows:

- For Class 5, 6, 7a, 9b: Provide at least 1 unisex accessible toilet, adjacent to every bank of toilets (where provided) on each storey, compliant with AS1428.1 under BCA/DDA Access Code part F2.4. If more than 1 toilet bank provided on each level, accessible toilet is required at 50% min. of toilet banks at each level.
- For Class 9b: If common-use change facilities provided (ie. both toilets and showers) a separate combined accessible WC/shower adjacent to male and female change rooms is required, compliant with AS1428.1 under BCA/DDA Access Code Part F2.4.
- An even number of left hand (LH) and right hand (RH) transfer WC pans (accessible toilets) is required within the building. Alternating LH/RH layouts on each subsequent level is the most appropriate and inclusive approach.
- Accessible WC requires 2300mm x 1900mm around the pan with the basin to sit outside this area in accordance with AS1428.1.
- An ambulant cubicle is required within every standard toilet bank adjacent to an accessible toilet under DDA Access Code Part F2.4 compliant with AS1428.1:2009.

Assessment

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements.

There are existing male, female and accessible sanitary facilities on levels 3 and 5. No works are being proposed to these facilities and are therefore not subject to review.

New male, female and accessible sanitary facilities are proposed within the back of house area of level 3 and during the common area of level 4. Both accessible toilets provide sufficient internal dimensions to allow for appropriate circulation around the toilet pan and washbasin. The male/female toilets currently do not show ambulant cubicles, however there is suitable circulation within the cubicles and along the paths of travel leading to them to be made compliant in further design development.

It is noted that there are multiple dressing rooms on level 3 with sanitary facilities associated with them. Under BCA Part F2.4, an accessible toilet is required at 50% of the banks of male/female toilets. It is advised that the PCA is consulted as to whether the dressing rooms toilets constituted toilet banks. A performance solution can be supported whereby the back of house accessible toilet can service the dressing rooms. It is advised for equity that an accessible dressing room with an AS1428.1 compliant accessible toilet is provided as a best practice measure.

On the basis of the current level of detail all access requirements appear capable of achieving compliance. Further work will be required during design development stage to ensure appropriate outcomes are achieved.

7.2 Common Areas

The BCA and DDA Premises Standards contain requirements for common use areas suitable for the use of persons with disabilities. These requirements can be summarised as follows:

- For class 9b buildings, access is required to and within all areas normally used by the occupants.

Assessment

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements.

It is noted that there are some dressing rooms on level 4 that are inaccessible. MGAC can support a performance solution whereby duplicate amenity is provided within the level 3 dressing rooms and can be made available under a managed solution whenever required.

On the basis of the current level of detail all access requirements appear capable of achieving compliance. Further work will be required during design development stage to ensure appropriate outcomes are achieved.

8. Conclusion

MGAC has assessed the proposed scheme for Project Francis. The proposed drawings indicate that accessibility requirements, pertaining to external site linkages, building access, common area access, theatre amenities and sanitary facilities can be readily achieved. It is advised that MGAC will work with the project team as the scheme progresses to ensure appropriate outcomes are achieved in the building design.