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Aspiring Properties

The Emporium
Redevelopment, 6 The Corso,
46, 47, 48, & 50 East
Esplanade, Manly NSW

Access Review – Final v2

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Table of contents

1. Executive Summary	4
2. Introduction	5
2.1 Background	5
2.2 Objectives	6
2.3 Limitations	6
2.4 Accessibility of Design	6
2.5 Statutory Requirements	6
3. General Access Planning Considerations	8
3.1 Codes	8
3.2 Universal Design	8
4. Ingress and Egress	9
4.1 Main Entrances: General	9
4.2 New Main Entrances at The Corso and East Esplanade	9
4.3 New Main Entrances for Café Tenancies on Ground Level	10
4.4 Emergency Egress	10
5. Paths of Travel	11
5.1 Circulation Areas	11
5.2 Common Areas	11
5.3 New Passenger Lift	12
5.4 New Common-Use Stairways	12
5.5 New Common-Use Ramps and Graded Walkways	13
5.6 Notes on Existing Stairways and Tenancies	13
6. Bathrooms	15
6.1 Ground Level Bathrooms	15
6.3 Levels 1-4 – New Commercial Bathrooms	15
6.4 Levels 1-4 – Existing Commercial Bathrooms	15
7. Conclusion	16

1. Executive Summary

The Access Review Report is a key element in the design development of The Emporium Redevelopment in Manly, and an appropriate response to the AS1428 series, Building Code of Australia (BCA), DDA Premises Standards (including DDA Access Code) and ultimately the Federal Disability Discrimination Act (DDA).

Morris Goding Access 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 all of the following elements comply with relevant statutory requirements and, in addition, aim to meet higher levels of accessibility and inclusiveness benchmarks set by the project: ingress and egress; paths of travel; circulation areas; common area access; and sanitary facilities.

2. Introduction

2.1 Background

Aspiring Group has engaged Morris Goding Access Consulting to provide an accessibility design review for the purposes of a development application for The Emporium Redevelopment, project, cited herein as 'the subject development'.

The site of the subject development is located in Manly NSW 2095 at 6 The Corso and 46, 47, 48, and 50 East Esplanade.

The scope of the subject development includes the following elements:

- Alterations and additions to the existing building at 6 The Corso to include multiple new retail suites, and multiple new commercial suites;
- A new internal passenger lift and multiple new internal stairways at the 6 The Corso building;
- Alterations and additions to the existing building at 46-48 East Esplanade to include a new retail suite and new bathrooms; and
- Miscellaneous internal pedestrian paths of travel to link the new and existing elements, including new pedestrian bridges to link the 6 The Corso and the East Esplanade buildings.

The following table sets out the components of the subject development and the corresponding building classifications:

Element	Location	Building Classification(s)
New retail tenancies	Ground Level, 6 The Corso Ground Level, 50 East Esplanade	Class 6
New retail common-use bathrooms	Ground Level, 46-48 East Esplanade	Class 6
New commercial offices, including new bathrooms	Levels 1-4 (inclusive), 6 The Corso.	Class 5

The requirements of the investigation are to:

- Review supplied drawings of the subject 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. The Report considers user groups, who include visitors, staff, students, commercial office workers, retail patrons, and members of the public. The Report seeks 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 ensure the development is designed to meet the object of the Disability Discrimination Act 1992 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-resistance of 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

This report will apply all of the following for the purposes of providing reasonable access provisions for people with disabilities: the Federal Disability Discrimination Act (DDA), the Disability (Access to Premises – Buildings) Standards 2010, the BCA, Universal Design principles, the AS1428 Series, and other design guidelines.

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

2.5 Statutory Requirements

The report has been prepared with reference to the following:

- Manly Development Control Plan 2013
- AS1428.1(2009) – Design for Access and Mobility
- AS1735.12(1999) – Lift Facilities for Persons with Disabilities
- Building Code of Australia 2019 (BCA) – Parts D3, E3, F2



- Federal Disability (Access to Premises – Buildings) Standards 2010, Schedule 1 of which is known as the 'Access Code for Buildings'
- Federal Disability Discrimination Act 1992 (DDA)

There are also additional advisory standards that are not currently adopted by the DDA Access Code 2010 or the BCA or that can be considered, including:

- Universal Design Principles
- AS1428.2(1992) – Enhanced and Additional requirements

3. General Access Planning Considerations

3.1 Codes

The Disability Discrimination Act 1992 (DDA) is federal law. Under the DDA, it is unlawful to discriminate against a person on the grounds of that person's disability.

The Disability (Access to Premises – Buildings) Standards 2010 ('Premises Standards 2010') are disability standards that were made pursuant to the DDA. The Premises Standards 2010 entered into force on 1 May 2011, and apply both to new buildings and the affected parts of existing buildings. Schedule 1 of the Premises Standards 2010 is also known as the Access Code for Buildings 2010. The disability provisions in the Building Code of Australia are substantially similar to those of the Premises Standards 2010.

Compliance with the Premises Standards 2010 and the BCA is achieved either via satisfaction of the Deemed-to-Satisfy requirements, or via an appropriate Performance Solution, or via a combination of both.

3.2 Universal Design

MGAC supports the use of universal design ('UD') principles to maximise access for all people. MGAC will assist the design team to incorporate UD principles where possible within the project, whilst still meeting mandatory compliance requirements.

UD principles consider the needs of a broad range of people including older people, families with children, 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 specialised 'accessible' features that can be costly, visually unappealing, and may perpetuate exclusion and potential stigma.

A UD approach has numerous benefits for the client, 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 makes good business sense, and is more sustainable.

The seven key Universal Design principles are:

- 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 and Egress

4.1 Main Entrances: General

The DDA Access Code 2010 and BCA contain requirements for building entrances to be suitable for the use of persons with disabilities. Key amongst those requirements are the following:

- The principal pedestrian entrance is required to be accessible.
- Where there is more than one main entrance, access is required through at least 50 per cent of the entrances. Note that, wherever possible, it is preferred that 100 per cent of the entrances are accessible.
- For buildings with a floor area of greater than 500m², any non-accessible entrance cannot be located more than 50m distance from an accessible entrance.
- All accessible doors to have 850mm min. clear width opening and suitable door circulation area, compliant with AS1428.1(2009). Note: Manual doors require lightweight door forces to be operable by people with disabilities (20N max.). We recommend that main entrances include automated sliding doors to be used where possible. Revolving doors are not deemed to be accessible; if they are provided, an alternate accessible entry door is required adjacent.
- An accessible path of travel, eg. ramp or lift, needs to be provided adjacent (or in reasonable proximity) to any stair access. Note: providing choice of access route directly adjacent so that people can start and finish in the same location/travel similar route promotes inclusion, and is accordance with UD principles.

4.2 New Main Entrances at The Corso and East Esplanade

Assessment

The subject development will include new works at the building at 6 The Corso. There will be a new main entrance that fronts The Corso itself on Ground Level. The main entrance consists of a set of dual-leaf hinged doors.

The doors will be detailed to comply with AS1428.1(2009). There will be a direct accessible path of travel from the public footpath on The Corso to the new main entrance for compliance with Manly DCP 2013, the DDA Access Code 2010 and the BCA.

The subject development will also include new works at the building at 50 East Esplanade. The new works will include re-grading of the existing ramped flooring from public footpath on East Esplanade up to a new common internal retail courtyard.

The new ramped flooring will have a suitable gradient and clear width throughout for compliance with Manly DCP 2013, the DDA Access Code 2010 and the BCA.

4.3 New Main Entrances for Café Tenancies on Ground Level

Assessment

There are two new retail tenancies on Ground Level of the 6 The Corso building – namely, Retail Suites 01 and 02. Each of the two tenancies directly fronts The Corso itself.

The provision of on-grade access from the public footpath on The Corso into the each of the above tenancies is achievable. This will be suitable for compliance with Manly DCP 2013, the DDA Access Code 2010, and the BCA.

There is a new café tenancy in Retail Suite 03 on Ground Level fronting East Esplanade. There is a 1:21-graded walkway that runs from the public footpath on East Esplanade up to a main entrance into an accessible that tenancy. This will be suitable to meet Manly DCP 2011, the DDA Access Code 2010, and the BCA.

4.4 Emergency Egress

The paths of travel for emergency egress from the Ground Level will be via the new building main entrances on The Corso and East Esplanade respectively. The paths of travel from the upper floor levels will be via the existing fire-isolated stairway in the building at 46-48 East Esplanade.

The DDA Access Code 2010 and the BCA each contain limited requirements for the provision of accessible features for people with a disability at fire doors and at fire-isolated stairs. The scope of the present development application does not, however, include any new works at the existing fire-isolated stair. Where no new works are proposed at existing fire stair, there would be no obligation for those existing elements to be upgraded to meet the current code requirements for accessible egress.

5. Paths of Travel

5.1 Circulation Areas

The DDA Access Code 2010 and BCA contain requirements for circulation areas for the use of persons with disabilities. These requirements can be summarised as follows:

- Wheelchair passing bays of 1800mm (width) x 2000 (length) are required along the parts of an accessway at which a direct line of sight is not available and are to be provided at 20m max. intervals along accessways.
- Wheelchair turning bays of 1540mm (width) x 2070mm (length) are required within 2m of every corridor end and at 20m.max intervals along all accessways. This is needed for wheelchairs to make a 180-degree turn, compliant with AS1428.1(2009).
- All doorways for common use 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. The majority of the clearances shown in the schematic design will allow for accessible paths of travel for people with a disability in accordance with the DDA Access Code 2010, and the BCA.

It is noted in particular, however, that there is an existing bank of retail bathrooms within the 46-48 East Esplanade building on Ground Level. The path of travel to the bathrooms includes a new doorway adjacent to the existing lift. The above doorway will require auto-operation to achieve compliance with AS1428.1(2009). This is achievable.

5.2 Common Areas

The DDA Access Code 2010 and BCA contain requirements for access to and within common areas for persons with disabilities. These requirements can be summarised as follows:

- For Class 6: Wheelchair access compliant with AS1428.1(2009) is required to any common-use areas.
- For Class 9b: Wheelchair access compliant with AS1428.1(2009) is required to any common-use areas.

Assessment

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



It is noted in particular that there will be an enclosed common-use courtyard on Level 1. The provision of a minimum latch-side clearance of 510mm will be required at the entry doorway of that courtyard for compliance with AS1428.1(2009). This is achievable.

It is noted that there will be a balcony on Level 3 at 6 The Corso for the use of Commercial Suites 301, 302, and 303. There will also be a balcony for the use of commercial suite 401 on Level 4 at 6 The Corso.

An accessible path of travel will be required from the suites to the corresponding balconies for compliance with the DDA Access Code 2010, and the BCA. This is achievable.

5.3 New Passenger Lift

The DDA Access Code 2010 and BCA 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 Part E3.6 of the DDA Access Code 2010 / BCA.
- All lift lobbies and main corridors on each floor level should have a minimum clear width of 1800mm to allow two wheelchairs the ability to pass each other.

Assessment

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements. Upon review, the following is noted.

There will be a single new passenger lift in the subject building. The lift shaft will accommodate a lift car that will have internal dimensions for compliance with the DDA Access Code 2010 / BCA. The passenger lift components will be detailed during design development stage to meet the requirements of the DDA Access Code 2010 / BCA.

5.4 New Common-Use Stairways

The DDA Access Code 2010 and BCA contain requirements for stairways for the use of persons with disabilities. These requirements can be summarised as follows:

- Stairs are to have handrails on both sides in accordance with AS1428.1(2009)
- Stairs and 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. Upon review, the following is noted.

The subject development will include the following common-use stairways. First, there will be a new common-use stairway in the north sector, near The Corso itself, that will run from Ground Level to 3.

Secondly, on Ground Level, there will be a new base-building stairway that will run from the back-of-house doorways at Retail Suites 01 and 02.

Thirdly, there will be new internal stairways respectively within Retail Suite 03 on Ground Level and Commercial Suite 402 on Level 4.

Finally, there will be new base-building three-tread common-use stairways near the new passenger lift on Levels 1, 2, 3, and 4 respectively.

Each of the above stairways will be detailed during design development stage to meet the requirements of AS1428.1(2009).

5.5 New Common-Use Ramps and Graded Walkways

The DDA Access Code 2010 and BCA contain requirements for ramps and graded walkways for the use of persons with disabilities. These requirements can be summarised as follows:

- Ramps maximum 1:14 gradient with landings at no more than 9 metre intervals
- Ramps with handrails on both sides with minimum 1 metre clearance in accordance with AS1428.1
- Landings 1200mm length with 1500mm length at 90 degree turns
- 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. Upon review, the following is noted.

On Ground Level of 6 The Corso, there will be new 1:20 walkways within the main entry corridor that runs from The Corso main entrance to the new lift lobby. On Levels 2 and 3, there will be a new 1:20 walkways in the common circulation corridors. Each of the above walkways will be capable of complying with AS1428.1(2009).

On Levels 1 and 4, there will be a new 1:14 ramps in the common circulation corridors. Each of the above ramps will be capable of complying with AS1428.1(2009).

5.6 Notes on Existing Stairways and Tenancies

There are three existing heritage retail tenancies on Ground Level that each front East Esplanade. Each of the above tenancies has an existing external main entry stairway. There are also multiple existing internal stairways within the 46-48 East Esplanade building.

The scope of works does not include any modification to any of the above existing stairways. Where no new works are proposed at existing stairways, there is no obligation for those stairways to be upgraded to meet the accessibility requirements of current code.



There are multiple existing retail tenancies on Ground Level of 46-48 East Esplanade. There are multiple existing commercial and education suites on Levels 1-4 of the 46-48 East Esplanade building.

The scope of works does not include any modification to the existing built fabric of any of the above existing retail and commercial tenancies. Where no new works are proposed at the existing tenancies, there would be no obligation for those tenancies to be upgraded to meet the accessibility requirements of current code. Further, there would be no obligation to provide an accessible path of travel to those tenancies.

6. Bathrooms

6.1 Ground Level Bathrooms

There will be one stand-alone unisex accessible toilet within Retail Suite 01 and one stand-alone unisex accessible toilet within Retail Suite 02 on Ground Level of the building at 6 The Corso. There are no other sanitary facilities included in the base-building works within either of those tenancies.

The provision of one unisex accessible bathroom within the above retail tenancies will meet the minimum quantity of accessible bathrooms for those tenancies for compliance with the DDA Access Code 2010 / BCA.

There is a bank of existing retail bathrooms on the Ground Level of the building at 46-48 East Esplanade. There is an existing accessible bathroom within the existing bank. That existing accessible bathroom will satisfy the minimum requirements of the BCA for accessible bathrooms for retail use on that level.

There will be one new male and one new female ambulant cubicle on Ground Level. This satisfies the minimum quantity of ambulant cubicles for compliance with the DDA Access Code 2010 / BCA for the Ground Level.

6.3 Levels 1-4 – New Commercial Bathrooms

There are new commercial bathrooms on Levels 1-4 respectively. There is one stand-alone unisex accessible toilet at each of the above banks. This will meet the minimum quantity of accessible toilets for each of those floor levels for compliance with the DDA Access Code 2010 / BCA.

There will be at least one male ambulant cubicle and one female ambulant cubicle respectively on Levels 1-4 for commercial use. This will meet the minimum quantity of ambulant facilities for each of those floor levels for compliance with the DDA Access Code 2010 / BCA.

6.4 Levels 1-4 – Existing Commercial Bathrooms

There are existing banks of male and female toilets respectively on Levels 1-4 of the building at 46-48 East Esplanade. The scope of the present development application does not include any new works at any of those banks.

In instances in which there are no new works at existing sanitary facilities, there would be no obligation for those toilets to be upgraded to meet the accessibility requirements of the current code. Further, there would be no obligation to provide a new accessible path of travel to those sanitary facilities.

7. Conclusion

MGAC has assessed the proposed scheme for The Emporium Redevelopment in Manly. The proposed drawings indicate that accessibility requirements pertaining to external site linkages, building access, common area access, and sanitary facilities can be achieved.

MGAC will work with the project team as the scheme progresses to ensure appropriate outcomes are achieved in building design and external domain design.