



Morris Goding  
Access Consulting

Scentre Group

Westfield Hurstville -  
ELP Extension

**Access Review v2**

9<sup>th</sup> September 2020



REPORT REVISIONS		
Date	Version	Drawing No / Revision
16.06.20	Draft	General Arrangement Plans- 24/12/2015. DWG 08.0005- Level R2- Rev 3. SDC- 99. 0511- Level P5- Option E1 EP5- Rev C. SDC- 99. 0511- Level P6- Option E1 EP6 Rev C.
30.06.20	Final	General Arrangement Plans- 24/12/2015 DWG 08.0005- Level R2- Rev 3 DWG 01.1004- Level Retail 04 (Parking P5)- Rev A DWG 01.1005- Level Retail 05 (Parking P6)- Rev A
09.09.20	v2	4639 – 01.1003 Rev A, 4639 – 01.1003 Rev A, 4639 – 01.1004 and Rev A, 4639 – 01.1004 Rev A.  By Dexus.

This report is prepared by:

Jhoana Colorado  
Access Consultant  
Morris Goding Access Consulting

## Table of contents

1. Executive Summary	4
2. Introduction	5
2.1 Background	5
2.2 Objectives	5
2.3 Limitations	5
2.4 Accessibility of Design	6
2.5 Statutory Requirements	6
3. General Access Planning Considerations	7
4. Affected Part of the Premises Standards 2010	8
4.1 Part 2.1 Clause 5 Affected Part	8
5. Ingress & Egress	8
5.1 External Linkages	8
5.2 Entrances	11
5.3 Emergency Egress	11
6. Paths of Travel	12
6.1 Circulation Areas	12
6.2 Passenger Lifts	12
6.3 Stairs & Ramps	13
7. Facilities & Amenities	14
7.1 Sanitary Facilities	14
7.2 Common Areas	14
7.3 Car Parking	15
8. Conclusion	16



## 1. Executive Summary

The Access Review Report is a key element in the design development of the new extension of the existing Rooftop, located at Westfield Hurstville, 443 Park Road, Hurstville NSW 2220, and the 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 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 ingress and egress, paths of travel, circulation areas, 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

Scentre Group has engaged Morris Goding Access Consulting, to provide a design review of the new extension of the existing Rooftop, located at Westfield Hurstville, 443 Park Road, Hurstville NSW 2220. The development consists of,

- The upgrade and extension of existing Rooftop facilities. The works cover the Affected Part from the main pedestrian entry on Humphrey's Lane to the new extension works (ELP) on levels P5 and P6 (Retail 04 and 05 respectively).
- Vertical access will be required to be upgraded to address AS1735.12-1999 and BCA E3 compliances as part of the existing accessible path of travel to the new works. (Affected Part).
- New works associated sanitary facilities.

The proposed development falls under the BCA classification:

- Class 6 (retail)

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 customers, 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 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.

## **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 for Access);
- AS 1428.4.1:2009 - (Tactile Ground Surface Indicators);
- AS 1735.12:1999 - (Lift Facilities for Persons with Disabilities);
- Georges River Council DCP- Section 3.3 Access and Mobility

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.

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. Affected Part of the Premises Standards 2010

### 4.1 Part 2.1 Clause 5 Affected Part

Clause 5 of Part 2.1 of the premises Standards 2010 defines the Affected Parts as:

- (a) The principal pedestrian entrance of an existing building that contains a new part; and
- (b) any part of an existing building that contains a new part, that is necessary to provide a continuous accessible path of travel from the entrance to the new part.

#### Assessment

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements. On the basis of the current level of detail all access requirements appear capable of achieving compliance subject to resolution of some minor issues in regard to upgrading the accessible path of travel from the main pedestrian entry to the new works.

Further work will be required during design development stage to ensure appropriate outcomes are achieved.

## 5. Ingress & Egress

### 5.1 External Linkages

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 the main pedestrian entry points at the site allotment boundary to all building entrances compliant with AS1428.1:2009.

#### Assessment 1

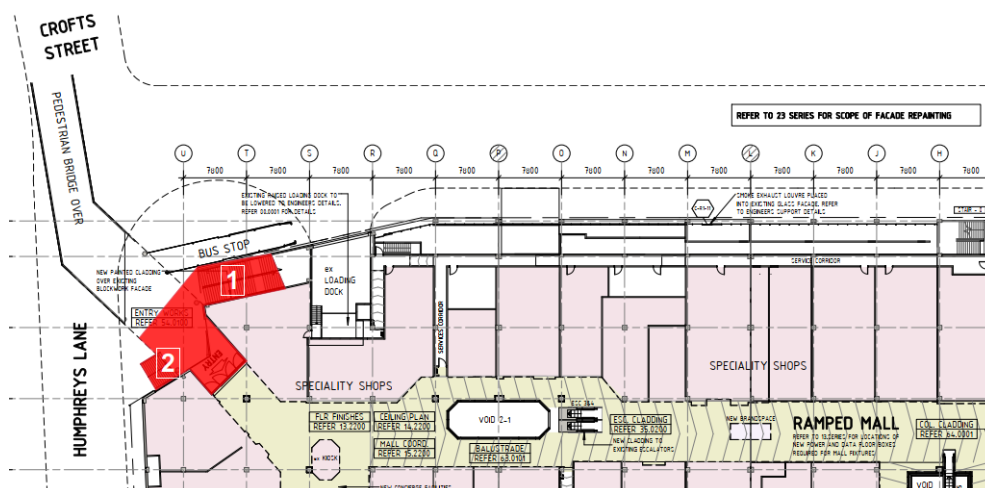


Figure 1. Level R2 Main Entrance Linkages



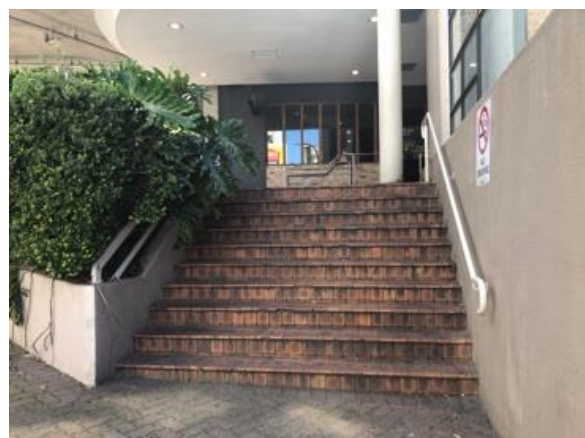


MGAC has audited entrances from allotment boundary on Crofts Avenue, corner with Cross Street and Humphreys Lane. The following have been identified as non-compliances:

- Path of travel is in poor condition.
- Cross falls on the accessible path of travel from boundary to entry doors exceeded 1:40 maximum gradient requirement.
- The entrance at level 2 (street level) does not provide landing prior to the door, which is not in accordance with AS1428.1.
- Existing stairs No.1 and No.2 shown below are not set in accordance with AS1428.1.



*Figure 2. Stairs No.1 Located on Cross Street*



*Figure 3. Stairs No.2 Located on Humphreys*

- Entry doors do not provide solid decals in accordance with AS1428.1.
- Entry area also has poor illumination.

### *Recommendations*

- Upgrade paths of travel in poor condition to avoid trip hazards or DDA complaints.
- Floor finishes surfaces are to be in accordance with AS1428.1, Clause 7.2.
- Where cross fall occurs, provide 1:40 max. gradient.
- Entry doors are to provide 1450mm min. Length level landing in front of the doors. Ensuring landing are 1:40 max. gradient. If the existing drop is to be maintained, ensure 1:20 walkway with 1:40 cross falls max. gradients are provided.
- Ensure existing stairs are compliant with AS1428.1. This includes handrails on both sides, slip-resistant and contrasting solid nosings. Handrails extensions, level landings etc.
- Ensure that the minimum illumination levels are meet and compliant with AS1428.2 in particular (entrances, passageways and walkways have a provision of s150 Lux).

### *Assessment 2*

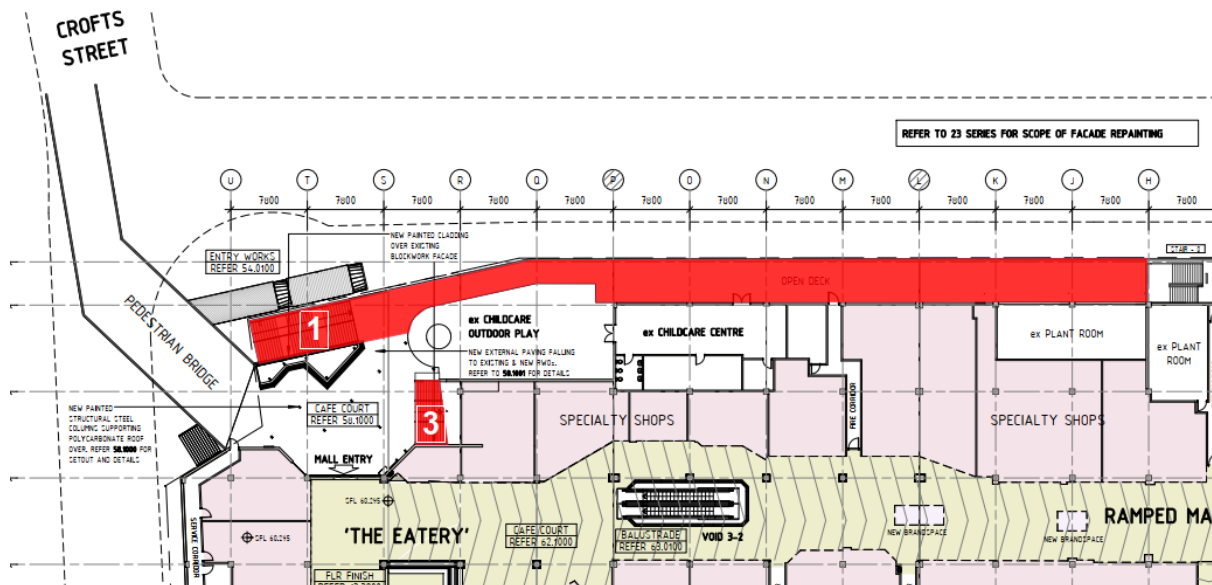


Figure 4. Stairs 1 Located on Cross Street that links at L3 to stairs 3.

MGAC has audited entrances from allotment boundary on Cross Street. The following have been identified as non-compliances:

- Cross falls on the accessible path of travel from boundary to entry doors exceeded 1:40 maximum gradient requirement.
- Existing stairs No.3 shown in the above floor plan are not set in accordance with AS1428.1.

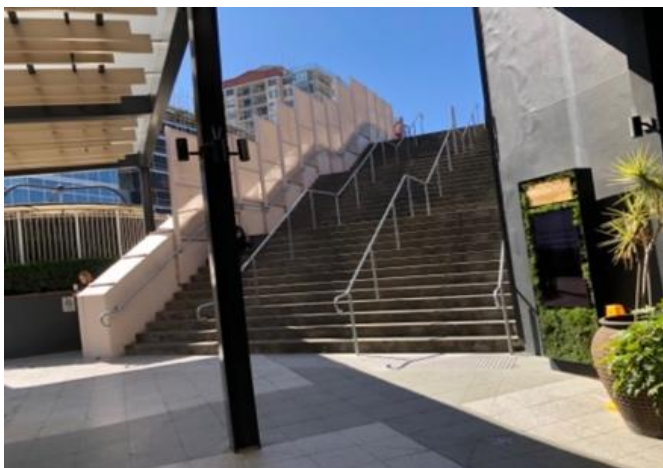


Figure 5. Stairs No.3 visible from Cross Street Facade



Figure 6. Non-compliant Cross falls

- Floor finishes surfaces are to be in accordance with AS1428.1, Clause 7.2.
- Where cross fall occurs, provide 1:40 max. gradient.
- Ensure existing stairs are compliant with AS1428.1. This includes handrails on both sides, slip-resistant and contrasting solid nosings. Handrails extensions, level landings etc.

## 5.2 Entrances

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

- Access through at least 50% of entrances, including the principal pedestrian entrance/s to all buildings or parts of buildings (ie. when they have a separate function and/or use eg. external retail tenancy). Note it is preferred that all entrances are accessible.
- A non-accessible entry located no more than 50m distance from an accessible entry (for buildings greater than 500m<sup>2</sup>).
- All accessible doors with 850mm min. clear width opening and suitable door circulation area, compliant with AS1428.1:2009.
- An accessible path of travel eg. ramp or lift 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 UD principles.

### *Assessment*

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements. On the basis of the current level of detail all access requirements appear capable of achieving compliance subject to resolution of some minor issues in regard to lack of detail regarding entry doors into tenancies and the ELP to be confirmed.

**NB:** Scentre Group have advised that these matters will achieve full compliance at design development stage.

## 5.3 Emergency Egress

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements, and Emergency Egress is not applicable (N/A) to this project.

## 6. Paths of Travel

### 6.1 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) 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) 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 (ie. not excluded under Part D3.4) with 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 with 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. 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.

Further work will be required during design development stage to ensure appropriate outcomes are achieved.

### 6.2 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 with 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 with 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.

Scentre Group has confirmed that the existing lifts are being replaced and the new lifts will comply with AS1735.12-1999 and BCA E3 to satisfy Affected Part (accessible path of travel from main pedestrian entry to the new works).

Further work will be required during design development stage to ensure appropriate

outcomes are achieved. 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.

### **6.3 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 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
- Stairs handrails on both sides in accordance with AS1428.1
- Stairs and ramps with 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. 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.

Further work will be required during design development stage to ensure appropriate outcomes are achieved.

**NB:** Scentre Group have advised that these matters will achieve full compliance at design development stage.

## 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 6: 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.
- An even number of left hand (LH) and right hand (RH) transfer WC pans (accessible toilets) within the building. Alternating LH/RH layouts on each subsequent level is the most appropriate and inclusive approach.
- Accessible WC with 2300mm x 1900mm around the pan with the basin to sit outside this area in accordance with AS1428.1.
- An ambulant cubicle 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. On the basis of the current level of detail all access requirements appear capable of achieving compliance. Greater detail is required, concerning the approach for sanitary facilities.

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:

- Accessibility to common use courtyards within buildings
- Wheelchair access is required to any external and outdoor terrace areas including roof terraces compliant with AS1428.1.

#### Assessment

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

Ensure all new areas are accessible and accessible path of travel is to comply with AS1428.1.

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.

### **7.3 Car Parking**

#### *Assessment*

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements and car parking is not applicable (N/A) to this project.



## 8. Conclusion

MGAC has assessed the proposed scheme for the new extension of the existing Rooftop, located at Westfield Hurstville, 443 Park Road, Hurstville NSW 2220. The proposed drawings indicate that accessibility requirements, pertaining to the Affected Part, external site linkages, building access, common area access, paths of travel 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 building design and external domain design.