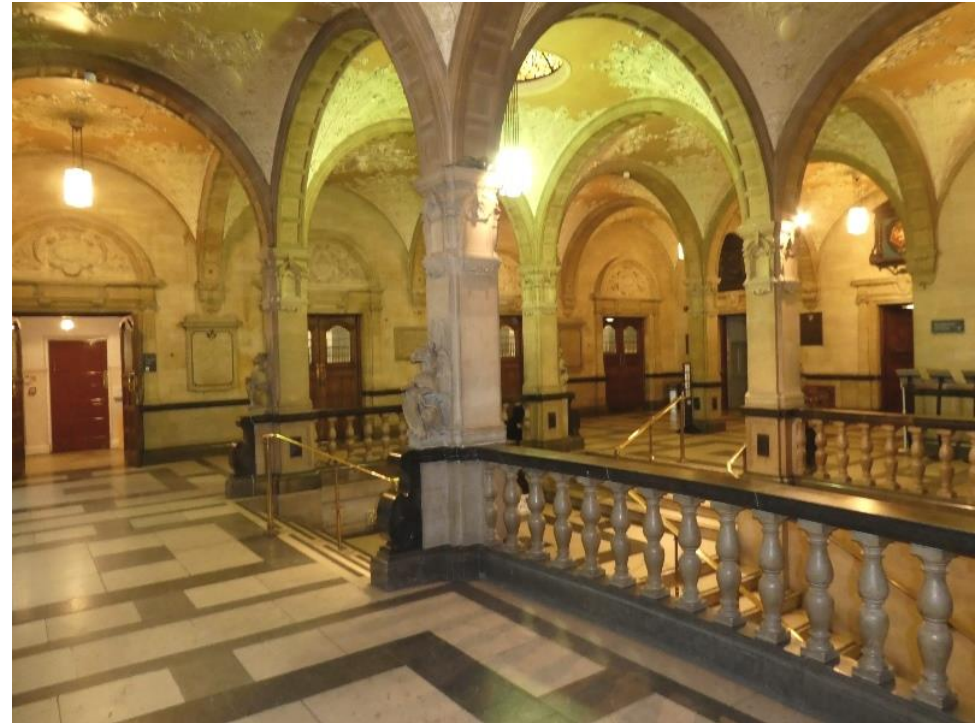


Access Audit Report of Oxford Town Hall and St Aldate's Chambers

FINAL REPORT



June 2018

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1 Introduction

This Access Audit Report of Oxford Town Hall and St Aldate's Chambers has been commissioned by Oxford City Council. An audit visit was carried out by Jane Toplis and Louise Weissel on 05 March 2018.

1.1 Format of Report and Methodology

This report consists of the following sections:

- 1 Introduction
 - 2 Summary of Access Barriers and Recommendations
 - 3 Potential Areas for Feasibility Studies to Improve Access
- Appendices, including the Audit Tables and the Legislative Context.

Consultations

The draft report was reviewed by a group of Members and Staff on 18 April 2018. The session was attended by:

- Councillor Marie Tidball – Executive Board Member for Young People, Schools & Public Health
- Debbie Haynes – Energy Efficiency Projects Officer
- Ben Challands – ICT Support Analyst
- Katharine Owen – Principal Conservation Officer
- Paul Adams – HR & Payroll Manager
- David Hunt – Commercial Manager, Community Services Directorate
- Jane Toplis – Access Consultant

1.2 Arrival at Oxford Town Hall and St Aldate's Chambers

Oxford Town Hall and St Aldate's Chambers are located opposite each other on St Aldate's, a road leading south from the centre of Oxford. St Aldate's is one of the main roads arriving from the south of the city and a busy bus route. A large amount of traffic is channelled along St Aldate's and High Street, because of the pedestrianised areas to the north. Even though the buildings are well positioned for public transport, the Town Hall and St Aldate's Chambers suffer, because there is a lack of parking and the

pavements are congested with pedestrians in this central Oxford location.

The Council has recently commissioned the Oxford City Centre: Movement and Public Realm Strategy, which may consider altering the pavement line in St Aldate's, and install traffic calming, improved crossing places and updated traffic management.

1.3 Town Hall

Building Description

The Town Hall is an ornate Victorian building with some later additions. It was built in 1897, designed by Henry T. Hare and is Grade II* listed. The Museum of Oxford, located in the former Reference Library, opened in 1975. The Court and Police Station on the southeast side have been relocated to other buildings in the city.

The building is more or less four storeys high and internally there are many changes of level. Plans of the ground and first floors are on the following page.

The main entrance into the Town Hall is from St Aldates up a flight of steps. The accessible entrance is further to the north along the

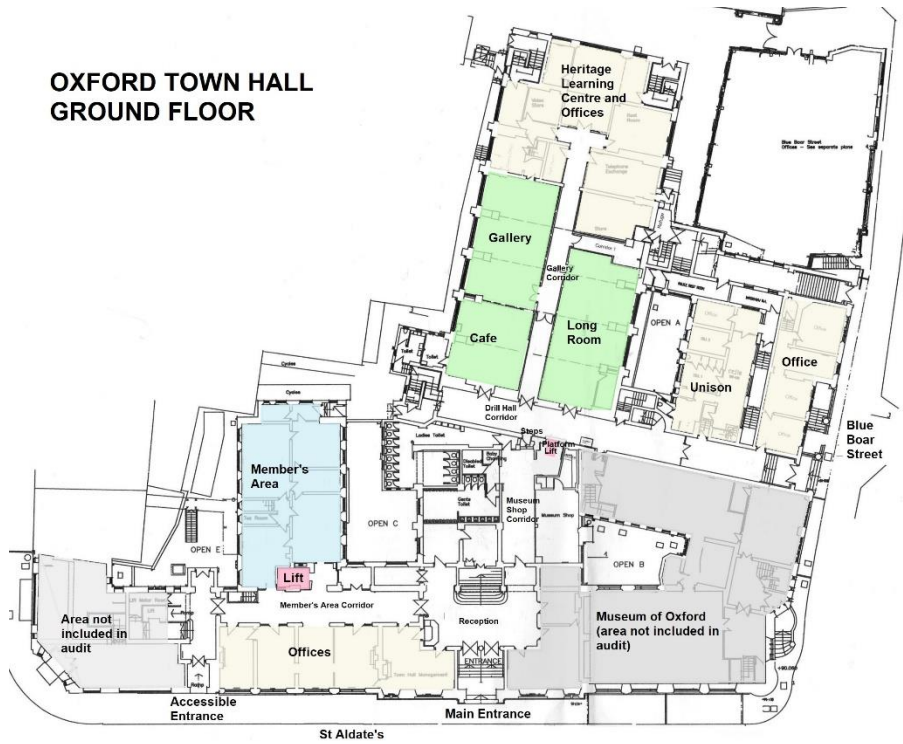
St Aldates elevation. The Museum of Oxford in the southwest corner of the building was previously entered from Blue Boar Street, but is now entered from within the Town Hall.

The Town Hall is considered to have exceptional significance as a civic building within a prominent city centre site, and is noted for its richly decorated Elizabethan-Jacobean Revival exterior and interior (Conservation Management Plan by Keevill Heritage Consultancy, 2006 Section 4.3).

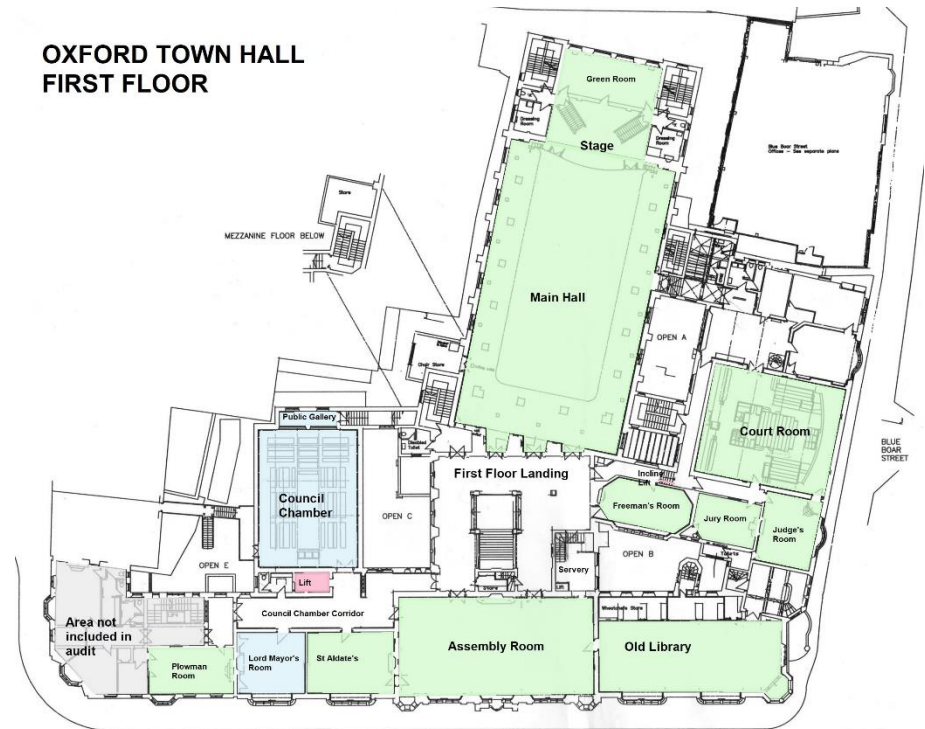
Activities in the Building

With the Town Hall are a series of civic, assembly and meeting rooms, mostly at first floor level. These rooms are reached through the Town Hall's main entrance, or via the Accessible Entrance further along the street. They include the 750-seat Main Hall and two other large assembly rooms, which are used for public functions, civic ceremonies, concerts, conferences and receptions. The Court Room is used as a wedding venue and occasionally as a film set, and the City Council holds its meetings in the Council Chamber. All these rooms are used for internal meetings by Council departments, as well as being let to external commercial and community organisations.

OXFORD TOWN HALL GROUND FLOOR



OXFORD TOWN HALL FIRST FLOOR



In recent years a café, gallery and meeting room have been opened in rooms under the Main Hall. There are offices for Council Members and administrative staff at ground floor level, catering facilities at second floor level and a large basement used for storage.

The Police Station and former Public WCs on the southeast side of the building have not been operational for many years and are currently unused, except as offices at ground floor level. The unused lower level of the Police Station was not included in this audit.

Museum of Oxford

The Museum of Oxford is on two floors at ground floor and basement level on the corner of St Aldate's and Blue Boar Street. This audit report excludes the Museum areas because they are subject to development proposals currently at RIBA Stage 4. Jane Toplis Associates Ltd is also appointed as Access Consultants for the Museum project. The Museum will continue to be entered through the Town Hall Reception, and one significant access issue with regards to the Museum of Oxford project is the difficult entry into the Town Hall for people with disabilities via the current Accessible Entrance. This report also discusses this arrival route and recommends that its upgrading is addressed.

Existing Improvements to Access at the Town Hall

Over the years disabled access to the Town Hall has been improved, following a process of audits and reviews of the building. The most significant are in the following areas:

- Accessible entrance from St Aldate's which has a 1:17 gradient with no handrails, an intercom to the reception and automatic doors.
- Installation of a passenger lift which connects basement, ground and first floor.
- Incline platform lift on route to the Court Room and adjacent first floor meeting rooms, installed in 2005.
- Vertical rise platform lift installed between the main foyer and the Drill Hall Corridor within the last ten years. This platform lift provides access to the ground floor areas under the Main Hall, where there is a gallery, café, and conference suite. Before its closure for redevelopment this platform lift also provided level access to a doorway into the rear of the Museum, so that the ground floor displays were accessible.

1.4 St. Aldate's Chambers

St. Aldate's Chambers was built in the late 1930s, originally as a telephone exchange with a shop premises on the ground floor. The building refurbishment in 2012 created open plan office accommodation, which allowed the Council to rationalise their city centre administration and conference/meeting rooms.

The building has four floors plus a basement. The customer services area on the ground floor has a reception area, waiting area, self-service computer facilities and interview rooms. The ground to third floors are used as office accommodation. The basement is used for storage, post room, prayer room, offices and boiler/plant room.

The building is serviced by two passenger lifts in the main central stairwell area. Alternate male and female WCs are located on each floor and staff showers and changing facilities are in the basement.

2 Summary of Access Barriers and Recommendations

This section summarises the recommendations made in the Audit Tables in the Appendices.

2.1 Approach and Parking (ARP Audit Tables)

The audit tables that the only parking is located in the car park to the rear of St Aldate's Chambers. Otherwise people visiting or working in the two buildings have to park in the city centre car parks, or alternatively disabled people are dropped off near the building entrances. There is currently little information on the Council or Oxford Town Hall websites about parking or drop-off locations for disabled visitors, so this needs to be addressed.

On the approach to the buildings themselves along St Aldate's, the narrow pavements can be difficult for people with disabilities to safely negotiate. Bus stops, street furniture and parked bicycles reduce the available width for manoeuvring with a wheelchair or walking aids. We recommend widening the pavements and installing bike stands out of the pedestrian flow along St Aldate's.

The dropped kerb along St Aldate's near the Town Hall accessible entrance requires tactile warning strips to alert people with visual impairments about the change of gradient.

2.2 Oxford Town Hall (OTH Audit Tables)

Arrival and Prior Information: There is very little information on access for people with disabilities on the Town Hall website, so we recommend that this should be updated, including a map of Oxford, showing parking etc.

Main Entrance Steps: The access features on the main entrance steps need refreshing, including repainting the contrasting nosings and exploring the feasibility of installing handrails on the lower steps.

Accessible Entrance: At the accessible entrance from St Aldate's we recommend several short term improvements, including rationalising signage and lighting, removing clutter from the lobbies and automating narrow double doors. In the long term a feasibility study (see Section 4.1) is required to see if the Main Entrance can be adapted so that there is a more acceptable entrance into the building for staff, Council Members and members of the public with disabilities.

The reception counter requires adaptation, because there is no lowered section suitable for wheelchair users.

Steps and Stairs: The audit tables identifies a few short term adaptations to improve safety, such as extra safety measures on the steps to the Drill Hall Corridor at ground floor level. Other internal stairs require improved contrasting nosings on the stair treads and second handrails.

In the long term a feasibility study (see Section 4.2) is required to remodel the steps to the Drill Hall Corridor, so that they provide a wide safe stepped route to a substantial area of the building.

Passenger Lifts: The audit tables note the poor location of the only passenger lift and the lack of an alternative lift for patrons attending functions in the event of a breakdown. A feasibility study (see Section 4.3) is required to see if a second passenger lift can be installed between ground and first floor, which is located in a more central position, to provide an alternative to the existing passenger lift. It is essential to have a back-up lift.

A possible location is in the entrance corridor leading to the women's WCs. These WCs would also need to be reorganised to accommodate this new ramp. Alternatively it may be possible to find a location for the second passenger lift discussed above so that it also provides access to the rooms beyond the Drill Hall Corridor.

Platform Lifts: The existing ground floor level platform lift down to the Drill Hall Corridor is awkward and slow to use, thus hampering easy access to the café, gallery and conference rooms in this area. A feasibility study (see Section 4.2) is required to see if a ramp can replace the platform lift, to provide wheelchair access to the substantial number of rooms beyond the Drill Hall Corridor.

At first floor level the incline lift leading down to the Court Room, adjacent meeting rooms and the Barrister's Area is not an acceptable access solution. A feasibility study (see Section 4.4) is required to see if there is an alternative location for a vertical rise platform lift to provide an accessible route to these areas.

Narrow Doors: In some parts of the building double doors are too narrow, so they either need to be adapted (this may be difficult where they are ornate original doors) or automated. Examples are the doors to the Heritage Learning Centre and one set of entrance doors into the Main Hall. With regards to the Assembly Room and Old Library, a management procedure is required to ensure stewards are on hand to open the narrow double doors for a wheelchair user.

Door Details: Some knob handles are difficult for people with limited dexterity, and could be replaced with lever handles;

however on some of the original decorative doors this upgrade is unlikely to be permitted for conservation reasons. Other doors are heavy to push open and need their closers recalibrated.

Main Hall Stage: There is no wheelchair access to the Main Hall stage, so a movable platform lift should be purchased.

Café: Management procedures should be enforced to ensure that gangways are clear and narrow doors are left open for easy wheelchair circulation.

Plate Room: Because this basement room, which is visited on special tours, is only accessible by steps, it is recommended that supplementary interpretation of the room and its exhibits is located in an accessible location.

Court Room: Where there are narrow gangways, a feasibility study is required to see if small alterations can be made to allow a wheelchair user to reach the front of the Court Room.

Ground Floor Members Area: The means of escape routes from this area, which are currently stepped and along a narrow rear alley, need to be reviewed. This is especially important, if the

rooms are used by a Member who uses a wheelchair or has limited mobility.

Council Chamber: A feasibility study is required to see if the front rows of bench seating can be adapted, so that they can be moved away to allow wheelchair access to the central area. A review of means of escape would also be required. The study should also include a wheelchair position for a member of the public.

Staff Areas: Most of the office areas in the Town Hall only have stepped access, except Legal and Democratic Services reached from the Drill Hall Corridor and some small offices beyond the gallery. If a member of staff, who uses a wheelchair or cannot climb steps, joins a staff team which is located in an inaccessible room, the team should be relocated to an accessible office elsewhere in the Town Hall or in another Council building. At least one staff kitchen/ tea point requires wheelchair access.

Basement Storage and Archives: The basement corridors are very cluttered with discarded items. It is essential to remove these items from the corridors to minimise fire risks and trip hazards. Because there are some steps within the basement, a management procedure should be developed to provide a disabled person

assistance with fetching items from the archives and storage areas.

Ground Floor WCs: Both men's and women's facilities require cubicles for ambulant disabled users and visual contrast to the cubicle doors should be improved.

Council Chamber Corridor Wheelchair Accessible WC: Short term adaptations are required and in the long term a feasibility study should explore if the cubicle can be enlarged by knocking the lobby and cubicle together.

Main Hall Wheelchair Accessible WC: There are several issues needing attention within the cubicle, including removing the door closer and rehanging the door, so there is space to enter the cubicle. A small hand rinse basin should be installed at a correct distance from WC pan and the very hot radiator replaced.

Means of escape: Wheelchair refuges, communication panels and provision of Evac Chairs should be reviewed as part of the Fire Consultants Report.

Lighting: On some internal corridors light levels appear to be too low, so lighting levels should be reviewed and upgraded where

necessary. Where required by a specific Members or staff, for instance in the Members Area, consider installing automatic lighting.

Audio Enhancement: Implement recommendations made by Action for Hearing Loss.

Signage: The existing signage should be reviewed and upgraded where necessary.

2.3 St Aldate's Chambers (SAC Audit Tables)

Entrances: Push buttons to visitor and staff entrances should be clearly visible and close to the relevant doors for ease of access by all users. Additional weather matting is required to the staff entrance to reduce the risk of trips and falls.

Main reception waiting areas: Places for personal belongings are needed at easy-to-reach heights in main reception waiting areas.

Basement Post Room: Access from New Inn Yard to the Post Room is very awkward, with members of staff carrying items up and down steep steps and grappling with heavy door closers. A feasibility study should explore how heavy items can be brought into the building safely.

General staff facilities in the basement: The location of general staff facilities should be reconsidered because of the basement's narrow corridors, for instance access to the Quiet/Prayer Room.

Coat storage: Extra space for coat hanging in the office areas should be provided, particularly at lower levels.

Staff kitchens/tea rooms: Within each kitchen/tea room there should be an accessible counter for a wheelchair-using member of staff to pull up and make themselves a drink. We suggest replacing the breakfast bars with lower level worktops with knee-hole spaces under.

Circulation: All doors should be recalibrated to ensure that they are easy to open and close.

Doors: Doors to essential areas, such as WCs, should have colour, large signage or other clearly visible features for ease of access by people with visual impairments or non-regular users of the building.

Lifts: Lift call buttons should be easily distinguishable against their background.

Stairs: Subject to requirements of individual members of staff, extra handrails may be needed on stairs throughout the building, particularly if the stairs are not adjacent to the lifts.

WCs and Shower/Change areas: Improved visual contrast is required within all WCs. Other issues in the WCs include ensuring alarm cords are not tied up, clearly visible reset buttons in each of

the disabled WCs, shelves for colostomy bag users and an accessible shower somewhere in the building, if required by a disabled member of staff.

Signage and wayfinding: Throughout St Aldate's Chambers the visibility of manifestation and room numbers on glass and indicating floor levels is difficult to read and should be upgraded.

Lighting: Uplighters or other alternative light fittings are recommended to produce a more even spread of light and eliminate direct glare which can be problematic for people semi-reclined in wheelchairs.

3 Potential Areas for Feasibility Studies

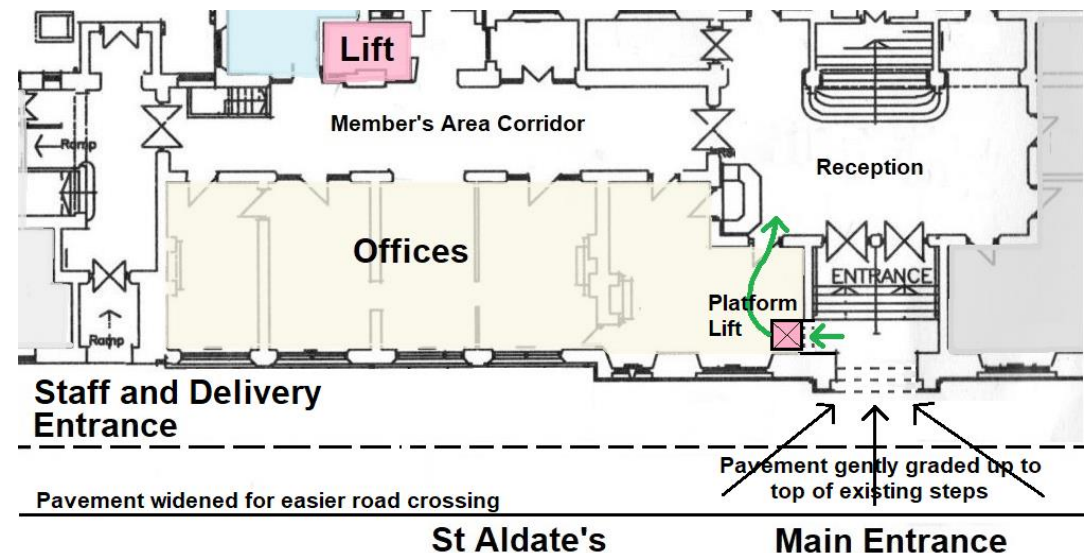
This section identifies possible feasibility studies required to see if significant long term access improvements can be made at the Town Hall.

3.1 Feasibility Study A: Main Entrance Ramp and Steps

This proposal considers the possibility of widening the pavement in St Aldate's, which we understand may possible as part of the Oxford City Centre: Movement and Public Realm Strategy. A wider pavement would allow sufficient space to gently ramp up to the intermediate landing of the main entrance steps. The ramped pavement could be installed over the existing three lower steps, so could be reversible in future. The proposal would form a new opening from the intermediate landing into the adjacent office, from where a new platform lift would take disabled people up to the ground floor level reception. As a precedent similar improvements to the entrances of Grade I listed public buildings are being considered elsewhere in the country.

Advantages

- Disabled people would enter the building at the same point and not need to travel along the pavement to the current Accessible Entrance.
- Disabled people would not need to ring a bell and wait for the locked door to be opened. They could also avoid passing through a staff area to reach the reception.
- The proposal could be combined with providing a cafe or more public space within the office nearest to the reception.



Sketch showing Feasibility Study A Works

3.2 Feasibility Study B: New Ramp and Improved Steps to Drill Hall Corridor

This feasibility study would explore the possibility of installing a ramp and improved steps down to the Drill Hall Corridor. This would require alterations to the corridor leading to the ladies WCs. It would also include widening and improving the three existing hazardous steps down to the corridor. The existing platform lift would be removed and this space used for extra WCs or for other purposes. The works would require some structural alterations and the provision of new partitions and fire doors (held open) to maintain fire compartmentation.

Advantages

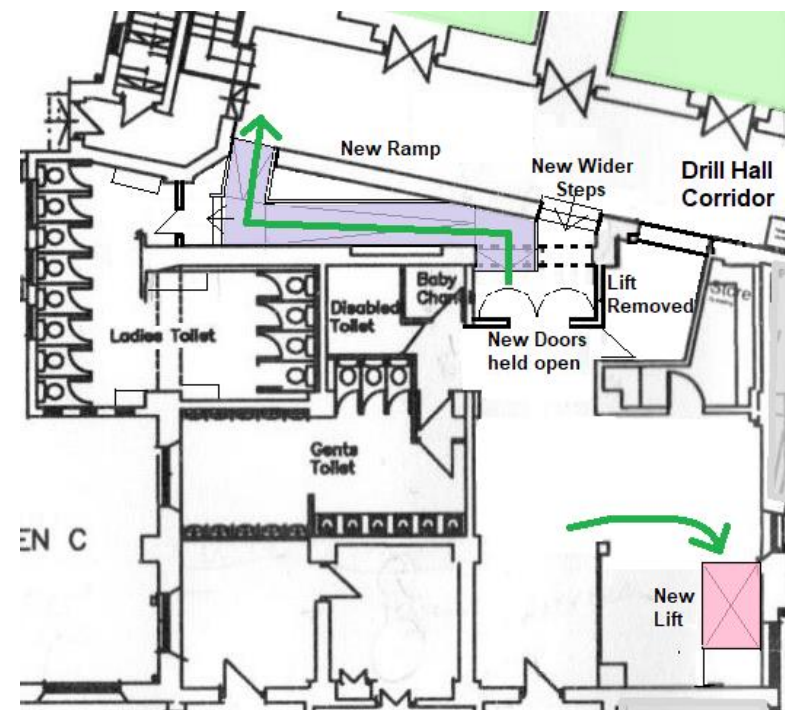
- The accessible route to the café, gallery, conference and other rooms beyond the Drill Hall Corridor would be ramped, so would not be reliant on the use of a slow platform lift.
- The stepped route would be designed to current access standards with handrails.
- There would be no ongoing servicing of the platform lift.
- Moving catering supplies and furniture around the building would be easier.

3.3 Feasibility Study C: New Passenger Lift to First Floor

A new passenger lift could be installed where the current Museum Shop is located, to provide a second lift route to the first floor event spaces.

Advantages

- This lift would arrive on the first floor landing (see plan on next page), in the same location as people climbing the main staircase. This would be better than using the existing lift in its out-of-the way location.
- The lift could also be used for transporting catering supplies, so they would not need to be wheeled through the public corridors at first floor level.



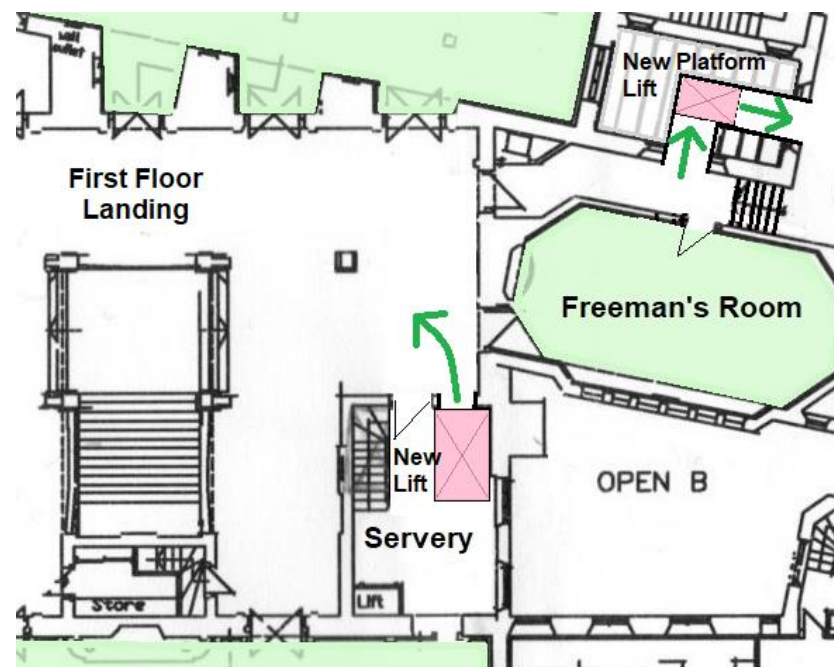
Sketch showing Feasibility Study B and C Works

3.4 Feasibility Study D: New Platform Lift to Court Room

A new platform lift could be installed in the lightwell adjacent to the steps leading down to the Court Room, and the incline platform lift currently installed on these steps would be removed. The feasibility study would need to explore the implications of roofing over this lightwell and forming two openings through existing windows on the corridors to reach the platform lift.

Advantages

- By installing a vertical rise platform lift this proposal would considerably improve the accessible route to the Court Room and other meeting rooms, because wheelchair users find using incline platform lifts very undignified and slow.
- The incline platform lift would no longer block the steps when it is in use.
- The vertical platform lift could also be used to move catering supplies and furniture to the Court Room and other meeting rooms.
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Sketch showing Feasibility Study C and D Works

Access Audit Report of Oxford Town Hall and St Aldate's Chambers
Appendix A Approach Route Parking Audit Table

Access Audit Report of Oxford Town Hall and St Aldate's Chambers

Appendix B Oxford Town Hall Audit Table

Access Audit Report of Oxford Town Hall and St Aldate's Chambers

Appendix C St Aldate's Chambers Audit Table

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Appendix D Legislative Context

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The Equality Act 2010 (formally the Disability Discrimination Act 1995/ 2005) sets out rights and duties for service providers, employers and institutions.

The Equality Acts defines a disabled person as ‘someone who has a physical and mental impairment, which has an effect on his or her ability to carry out normal day-to-day activities.’ The effect must be substantial, adverse and long-term.

Physical and mental impairment includes sensory impairments. It includes hidden impairments including, for example, mental illness.

a) Equality Act 2010

Under the Equality Act 2010 it is unlawful for service providers to treat disabled people less favourably because they are disabled. The service provider must not indirectly discriminate against a disabled person unless there is a clear reason to do so. They must also not treat a disabled person unfavourably because of something connected with their disability, unless there is a clear and fair reason. For this form of discrimination the service provider must know or should reasonably have been expected to know that the person is disabled.

A service provider must not harass a disabled person in relation to access to everyday services and there is protection from direct disability discrimination and harassment for people who are associated with a disabled person or who are wrongly believed to be disabled.

Service providers have to make reasonable adjustments for disabled people in the way they deliver their services. This is so that a disabled person is not put at a substantial disadvantage compared to non-disabled people in accessing the services.

Examples of reasonable adjustments could include:

- installing an induction loop for people who are hearing impaired
- providing disability awareness training for staff who have contact with the public
- providing larger, well-defined signage for people with impaired vision
- putting in a ramp at the entrance to a building which has steps

What is considered a reasonable adjustment for a large organisation like a bank, may be different from what is a reasonable adjustment for a small local shop. It is about what is practical in the service provider’s individual situation and what

resources they may have. They will not be required to make adjustments that are not reasonable because they are unaffordable or impractical.

Service Provider Provisions

The duty to make reasonable adjustments under the Equality Act 2010 Service Provider Provisions is an anticipatory duty owed to disabled people at large. It is not simply a duty to individuals. The duty to make reasonable adjustments, in relation to providing auxiliary aids and overcoming physical barriers to access, applies to the areas of the property where the service is provided, and the access to these areas.

Employer Provisions

Under the Equality Act 2010 there is a duty placed on employers to make reasonable adjustments to enable disabled people to take employment. Employers must take reasonable steps to alter arrangements made, or alter any physical feature that puts a disabled person at a substantial disadvantage. The duty to make adjustments is not anticipatory but is specific to the needs of individuals. There is no requirement to make wholesale changes in anticipation.

The organisation cannot fully anticipate a disabled employee's needs, since individual disabilities vary. Our review considers the

general circulation and facilities requirements for staff who may use mobility aids and other walking aids or who may have a visual or hearing impairment.

Once employment is offered to a disabled person, or an existing employee develops a disability, where this affects mobility, vision, hearing or other normal functions, his or her needs must be fully assessed. We recommend that the organisation holds confidential discussions with the individual and engages a professional access advisor to assess the need for suitable and reasonable adjustments to all work areas affected, including a personal emergency escape plan.

Equality Duty Provisions

The Disability Equality Duty requires all public bodies (e.g. councils, large institutions) to actively look at ways of ensuring that disabled people are treated equally. All of those bodies covered by the specific duties must also have produced a Disability Equality Scheme, which they should implement.

b) Historic Properties under the Equality Act

A key issue affecting access is how to reconcile access requirements to alter physical features with conservation objectives. The Equality Act does not override conservation legislation; what is 'reasonable accommodation' must take account of the architectural and historic nature of the buildings and landscapes.

Heritage England's guidance 'Easy Access to Historic Properties' (re-issued in 2015) provides useful guidance on alterations to historic properties for access. It provides the following guidance:- 'The access aim is to promote simple, uncomplicated movement up to, into and around historic properties. For those who can move or propel themselves independently, this should avoid their being carried, lifted or assisted in other ways. Ideally, it means using the property in the same way as everyone else in an easy dignified manner.'

It is preferable to provide independent means of access to allow visitors to 'use the property in the same way as everyone else'. However, in some historic buildings and landscapes, there will be occasions when it is not possible to make the necessary physical alteration to the premises. In some cases a changed route may be the only option to avoid features such as steps. But any 'alternative route must be reasonable and not pose an undue burden.'

c) Access standards

Building Regulations Part M and K

The design and construction of a new building, or the material alteration of an existing one, must comply with Building Regulations. For buildings in England and Wales, Building Regulations Part M, Access to and Use of Buildings and Building Regulations Part K, Protection from Falling, collision and impact, are intended to ensure that reasonable provision is made for people to gain access to and use buildings.

Guidance accompanying the Building Regulations (known as 'Approved Document M or K' or AD M or K) set out a number of 'provisions' as suggested ways in which the requirements of the Regulations might be met. It is unlikely to be reasonable for a service provider or employer to have to make an adjustment to a physical feature of a building which it occupies, if that feature accords with the relevant provisions of the most up to date version of AD M and K. Any works carried out under the previous versions of AD M and K are deemed to be acceptable for 10 years from the construction date under Equality Legislation.

BS 8300:2018

As the Building Regulations provide only a baseline standard of accessibility for new buildings and buildings undergoing redevelopment, a second document is essential reference when assessing the access requirements of disabled people to existing buildings and landscapes; the British Standard 8300:2018, *Design of buildings and their approaches to meet the needs of disabled people – Code of Practice*.

Indeed, it is unlikely to be reasonable for a service provider or an employer to have to make an adjustment to a physical feature of a building it occupies, if the design and construction of the physical features of the building is in accordance with the guidance in BS8300:2018.

Other Guidance

There are other 'best practice' guides, such as the Centre for Accessible Environments 'Designing for Accessibility', which gives advice concerning design issues not covered in AD M, AD K or BS8300:2018, and the Sign Design Guide, published by Royal National Institute for the Blind, 2000 (ISBN-10: 1858784123), providing useful information on signage.