



# ACCESS DESIGN SOLUTIONS

Access and Design Audits, Training, Project Management

ABN 20 607 206 290

RECEIVED <sup>SM</sup>  
26 FEB 2009  
BY: LACA

Re:- Comments on Access to Premises Standard 25<sup>th</sup> February 2009<sup>1</sup>

These comments are in the capacity as Chair of ME64 standards committee, the committee responsible for the development of the AS1428 Suite of Standards, and having been on that committee for 31 years and Chair for the past 19 years. Also as an Accredited Access Consultant of 19 years and one who has worked in the disability sector for 42 years I am hoping that my comments will not be taken lightly as each one is extremely important to the disability groups affected. The whole purpose of the A to P standard is to allow these people to enjoy the freedom and enjoyment of our communities we all do, without being discriminated against or being placed at risk.

It is appreciated that the "Access to Premises Standard" as a regulatory document tells us "*What we have to do*" whilst we turn to the Australian Standards to "*Tell us how to achieve the outcome*". Therefore this document should not have any technical information contained therein; these must be referenced to the appropriate Australian Standard.

The following are our observations on issues that require amendment to the Access to Premises Standard.

**Working off the "Consultation Draft only" document for references.**

Part	Reference	Issue	Recommendation
D3 Access for People with a Disability	Page 24, Table D3.1	No provision for disabled access has been made in Class 2 buildings under 3 storeys high. Class 2 buildings have many public and common areas, which need to be accessible by people with disabilities who wish to live above the ground floor or visit someone on a floor other than the ground floor.	That access/egress is provided to all levels where public and common areas exist for Class 2 buildings up to the entry door of each unit or apartment.

<sup>1</sup> Access to Premises Standard Comments.ltr250209

D3.4 Exemptions	Page 29 (f)	The upper floors less than 200m <sup>2</sup> of Class 5, 6, 7b & 8 buildings not having access provided is discriminating against people with disabilities from working within any of these smaller facilities. Job opportunities are being reduced significantly as many small businesses have multiple level facilities in these types of buildings, and many people with disabilities would be discriminated against by not having the opportunity to even apply for a job or have their own business in such a facility.	Clause (F) be eliminated from the D3.4 Exemption list.
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D3.6 Signage	Page 31	<p>Provision has only been made for signs to entrances, sanitary facilities in raised tactile and Braille format, which is excellent, however other information signage through out a facility is generally problematic in that:</p> <ul style="list-style-type: none"> <li>• No provision has been made for signs above a height of 2000mm above finished floor /ground level (AFFL/AFGL), which can be hidden out of sight if located between 1200mm to 1600mm AFFL/AFGL. These provisions are essential to assist people with disabilities in wayfinding to move about a building.</li> <li>• Provision needs to be made for <u>ALL</u> information signs to be in sentence case, as people with cognitive disabilities have difficulty in comprehending signs in upper case. Bigger is not always better. As soon as these signs are changed to sentence case then the problem disappears as this group of people, which is increasing in size with our ageing population, will then understand what the sign is telling them.</li> </ul>	<p>Provide the following additional paragraphs:</p> <p>(g) Information signs located ≥2000mm above the finished floor or ground level are to meet the criteria as set out in AS1428.1 – 20XX (still being fine tuned).</p> <p>(h) All information signs are to be in sentence case, e.g. upper and lower case.</p>
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<p>D3.8 Tactile Indicators</p>	<p>Page 33 Clause(1)(d)</p>	<p>This clause exempts step ramps and kerb ramps from having Tactile ground surface indicators (TGSI's) applied to them. It is obvious that the people involved in this decision do not fully understand their placement or the importance of TGSI's on step ramps and kerb ramps, which in each case is totally different. The following sets out the reasons why:</p> <ul style="list-style-type: none"><li>• <b>Step ramps</b> Firstly it is important to understand one of the main uses of TGSI's, which is to warn a person with vision loss of an <i>unexpected</i> hazardous situation along a path of travel. The A to PS requires that 1:14 to 1: 19.9 ramps have TGSI's as the change in grade of the path of travel is considered a tripping hazard, which is correct. The TGSI's are placed 300+/-10mm before the change of grade, to give adequate warning to a person with a vision loss that the hazard is immediately in front of them. Why then has someone decided <u>to eliminate TGSI's for step ramps, which have a steeper grade of 1: 8 to 1: 10 and are a much greater tripping hazard than 1: 14 ramps.</u> We also note that the <b>Guidelines on page 21</b> indicate their removal from step ramps because ".....of the danger of <i>slipping</i> on tactiles surfaces <i>on a slope</i>". <u>TGSI's for step ramps are not to be placed on the slope but 300+/-10mm before the change in grade.....also.....</u> <u>All TGSI's must meet the slip resistance rating of R11 for external and R10 for internal use by a registered NATA laboratory.</u> We know that some manufacturers have been installing TGSI's that do not meet these requirements, hence the problems. To eliminate the use of TGSI's at step ramps places people with vision loss in a hazardous situation, which is extremely irresponsible as they will and do trip on changes in grade. Councils Australia wide are spending large sums of \$'s grinding down and replacing paving lifted by tree roots or that have settled unevenly due to the incidence of people tripping and falling, many</li></ul>	<p>That step ramps be included as a requirement for TGSI applications in D3.8(1) and that the incorrect assumption in the Guidelines that TGSI's are placed on a slope be removed.</p>
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		<p>of whom do not have a vision loss.</p> <p>The misunderstanding of placing the TGSIs on the slope has obviously caused this issue. If the issue is one of slip resistance and it is, then <b><u>the correct approach should be to ensure that emphasis is placed on the correct slip resistance testing from a NATA registered laboratory</u></b> and not to eliminate them from being used to warn of the change in grade of a step ramp.</p> <ul style="list-style-type: none"><li>• <b>Kerb ramps</b> The application of TGSIs for kerb ramps is totally different to that of step ramps. In many cases TGSIs are not required to be used if the kerb ramp location and construction meet 3 design requirements as set out in the AS1428.4 standard. In every case a person with a vision loss will know that on corners they will expect a kerb ramp/s and at mid block crossings as directional TGSIs are used to guide them to the kerb ramp, therefore they are expecting a change in plane, unlike step ramps where they will be unaware of a step ramp along their path of travel. The TGSIs on a kerb ramp are used for 3 reasons. The 1<sup>st</sup> <b>to give the direction to safely travel across the vehicular way</b> to the other side so as they do not become disorientated and end up in the middle of an intersection. This is achieved by them aligning themselves perpendicular to the rear of the TGSIs which are to be installed perpendicular to the direction of travel.  The 2<sup>nd</sup> is that they are set back 300+/-10mm from the front line of the kerb on the shortest side of the kerb ramp to indicate <b>that by standing behind the TGSIs whilst waiting to cross they know that they are far enough back from the roadway not to come into contact with any part of a vehicle that may cut across a</b></li></ul>	<p>That kerb ramps be included as a requirement for TGI applications in D3.8(1) and that emphasis be placed on the slip resistance requirements, e.g. "TGI's are to meet the R10 &amp; R11 oil/wet ramp tests at a minimum grade of 12.5% or a gradient of 1: 8".</p>
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**corner or travelling close to the kerb and be struck by a wing mirror or other projection from the vehicle.**

Finally the 3<sup>rd</sup> reason is that many kerb ramps do not have the required change in grade of 1: 8 to 1: 8.5 compared to the walkway immediately in front of the kerb ramp. The minimum change in grade is required as people who have lost their vision as a result of diabetic retinopathy also have another side effect of their diabetes, which is loss of sensitivity in their extremities, e.g. feet, **which does not allow them to detect any change in plane where the gradient is less steeper than the 1: 8 to 1: 8.5 change compared to the walkway.**

Extensive dialogue over a 2 year period prior to the current AS1428.4 – 2002 took place between Standards Australia, Blind Citizens Australia and Physical Disability Council of Australia, the latter 2 being the peak bodies representing the interests of people with vision loss and those with a physical disability. Agreement was reached that TGSI's were important for people with vision loss and were to be placed on kerb ramps, with some variations as per the standard.

The issue is again one of slip resistance and it is that **the correct approach should be to ensure that emphasis is placed on the correct slip resistance testing from a NATA registered laboratory** and not to just eliminate them from being used on kerb ramps. By far the majority of TGSI installations are compliant and are not subject to people slipping on them in any weather conditions.

The Premises standard needs to regulate that TGSI's are to meet the R10 & R11 oil/wet ramp tests at a minimum grade of 12.5% or 1:8.

Some facts to help in further understanding this issue. Of the legally blind people in Australia, only 31% use a long cane, 2 – 3% use a guide

		<p>dog and the remaining 66% rely on their residual vision to move around the built environment. The last group, 66% are those who are being placed at risk at crossings if TGSI's are removed from kerb ramps. Many people in the past prior to the introduction of TGSI's would not venture out into the built environment, whereas now they are more confident to do so without being placed at risk and can enjoy being able to safely move around our built environment.</p> <p><b>The issue is one of regulating correct slip resistance of TGSI's, which will resolve the slipping issue and not to remove them from kerb ramps, which will place people with vision loss at risk and being in conflict with the DDA legislation in that it will be discriminatory.</b></p>	
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D3.8 Tactile Indicators	Page 33 Clause(1)(d)	<p>This clause exempts swimming pool ramps from having Tactile ground surface indicators (TGSI's) applied to them.</p> <p>The top of swimming pool ramps are just as hazardous as normal ramps elsewhere, even more so as water is involved and a person who accidentally stumbles on a change of gradient could fall, hit their head on the pool side and even drown. TGSI's are critical at the top of pool ramps to warn people with a vision loss of the change in gradient.</p>	That the application of TGSI's at the top of ramps be included for swimming pools as a requirement for TGSI applications in D3.8(1).
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D4.3 Braille and tactile sign specification	Page 36 (2)(ii)	<p>The specification of having the lower case, 50% of the upper case characters is incorrect. Most font styles, especially the Arial fonts have the lower case characters 2/3 the height of the upper case, this is a standard. This clause is not required as font styles are already regulated for and required the upper/lower case relationship.</p>	Remove D4.3(2)(ii) from the text <b>OR</b> correct it to read ".....must have a minimum height of 50% of the related upper case characters.
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D4.3 Braille and tactile sign specification	Page 37 (11)	The tactile text font chosen is required for people with vision loss, which is a sans serif font, however this does not go far enough as there are a number of Arial fonts that will not work for tactile signs, e.g. Arial Narrow, Arial Unicode MS, & <b>Arial Black</b> . Due to the spacing being too close or the letters being too thick (even though the specifications requires a minimum 2mm to 7mm), both of which make their reading extremely difficult or even impossible. The original specification referred to Helvetica medium or similar sans serif fonts, which was an excellent specification as the “Medium” set the letter thickness, upper/lower case relationship and spacing of letters.	Change to “Tactile text must be Arial, Helvetica medium or other similar sans serif typeface” This gives a choice of font style, all of which will suffice and be easily read tactually by people with vision loss.
D4.6 Braille	Page 37 (e)	The arrow is mentioned as a solid arrow, which would be clearer if the word “Raised” was inserted before the word arrow.	Insert the word “raised” between solid and arrow.
H2.2 Accessways	Page 47 (7)	The passing area is 6m, whereas in “D”, passing areas are to be every 20m. For consistency, the 6m needs to be changed to 20m. The 6m requirement is extremely onerous for local scenarios, whereas and much of the larger transport infrastructure sites will due to their nature have large wide open pedestrian areas. It will only be the pedestrian bridges and the like on smaller suburban transport facilities that will need this requirement where pedestrian traffic will be limited.	Change “....every 6 metres.....” to “every 20 metres.....”

Should you require any further information or wish to discuss this response please do not hesitate to contact me.

Sincerely

Murray Mountain  
Chair Australian Standards Committee ME64 (1428)