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Submission No 89

The Hon. Mark Dreyfus QC MP
House of Representatives Legal
and Constitutional Affairs
PO Box 6201
Parliament House
CANBERRA ACT 2600

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BY: LACA

Dear Mr Dreyfus

Inquiry into draft Disability (Access to Premises – Buildings) Standards 2009.

Moreland City Council is pleased to present this submission relating to the draft Disability (Access to Premises – Building) Standards.

Council is committed to ensuring the rights of people with a disability are recognised, protected and promoted. The issue of inaccessibility of the built environment features prominently in Council's Disability Policy and Action Plan. We therefore welcome the development of the draft standards.

Council notes that the draft standards would achieve greater consistency between the objectives of the Disability Discrimination Act 1992 (DDA) and relevant building legislation. The implementation of the standards, through their incorporation into the Building Code of Australia will provide significant benefits for the building industry, building authorities, communities in general and people with a disability in particular.

Council supports the draft standards, however we ask that the inquiry consider the following matters:

Class 2 Buildings

The initial draft Premises Standards released for public comment in 2004 included a provision that would require access to be provided to the common areas of Class 2 Buildings, namely apartments and blocks of flats.

Council notes that provisions for Class 2 buildings are not included in the 2009 draft standard. Council has articulated its position in numerous policy documents that a regulatory approach to achieving accessible housing is a desired and necessary course of action. Therefore we recommend that provisions for Class 2 buildings be incorporated into the draft standards.

Clause H2.14 Emergency Warning Systems

The draft standards propose that: 'in the event of an emergency, provisions must be made for people with vision impairment to locate the exit path.' Council proposes that consideration also be given to:

- Standardisation of visual warning devices with a safe visual light;
- Seals on smoke-isolating exit doors;
- Hearing loops-integrated with alarm systems;
- Luminescent evacuation plans and skirting board level arrows indicating fire refuge/exits and
- Fire rated lifts with separate electricity supply.

F2.4 Accessible sanitary facilities

Council acknowledges that the requirements for accessible sanitary facilities are an improvement on current requirements.

The section dealing with accessible sanitary facilities references AS1428.1, for specifications on circulation space and sanitary facilities. Current AS1428.1 requirements are not adequate for a significant number of people with a disability, namely those unable to access facilities without support. It is recommended that additional measures be investigated to ensure that individuals with high support needs have access to suitable sanitary facilities at some locations within the community.

While Council recognises the challenges this on facility planning and development, investigating class's and types of buildings that could accommodate such facilities would greatly improve access.

Please contact Councils MetroAccess officer Shawn Neilsen
for queries relating to this submission.

Yours sincerely

Peter Brown
CHIEF EXECUTIVE OFFICER

13 / 3 /2009