

By email

13 March 2009

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BY: LACA

Committee Secretary
House of Representatives Standing Committee on
Legal and Constitutional Affairs
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Attention: **Dr Anna Dacre**

Dear Dr Dacre,

Health Science Planning
Consultants Pty Ltd
ACN 050 195 170
ABN 34 050 195 170

Re: Inquiry into the draft Disability (Access to Premises – Buildings) Standards 2009

Health Science Planning Consultants (HSPC) is an architectural practice specialised in the design and planning of health care and residential aged care accommodation facilities. It also provides advice on access for people with disabilities.

Please find attached to this letter a submission from HSPC Disability Access Consultancy to the Inquiry, which has been written and formatted to be accessible using JAWS screen reader software.

This submission addresses all the documents listed for your review, with the primary aim of commenting on the draft Premises Standards itself (Exhibit 1) and the draft Australian Standards (Exhibits 9, 10 and 11) which it references.

It is understood that any proposal to amend BCA clauses derived from the Access Code, including the referenced Australian Standards, cannot be effected without a review by Parliament. This indicates the importance of achieving both accuracy and adequacy in the proposed Premises Standards.





It is our opinion that the collective draft documents prescribe a degree of access to buildings which is inferior to that anticipated by the Disability Discrimination Act. We are hopeful that the Committee will find the comments useful in its deliberations.

Please contact the undersigned by email or telephone should you require further input.

Francesca Davenport RAIA ACAA

Senior Architect & Access Consultant

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**Submission to House of Representatives
Standing Committee on Legal and Constitutional Affairs
Inquiry into the draft Disability (Access to Premises - Buildings) Standards 2009**

We note the Inquiry's Terms of Reference and offer the following comments on the documents released on 12 December 2008 and 12 February 2009.

1 GENERAL COMMENTS on EXHIBIT 1

In its current form the draft Disability (Access to Premises – Buildings) Standards 2009 will not achieve the degree of "certainty" to all that it is expected to provide because it lacks reference to some critical issues integral to the access provisions of the DDA. The main issues are:

- 1.1 The current draft Standard refers to AS1428.1 2001 which has a minimum 1000mm-wide clear accessway, applicable for the 80th percentile wheelchair size (A80 wheelchair) based on a research by John Bails in the early 1980s. The premise of the DDA is to reduce discrimination and the 90th percentile wheelchair size (A90 wheelchair) is considered the minimum appropriate model, which requires a minimum 1200mm-wide path of travel. This dimension still excludes more than 10% of current users of wheeled mobility devices. Increasing need for wider wheelchairs reduces the proportion of A80 wheelchairs in use.

A 1200mm-wide clear path of travel will also meet the needs of people with vision impairment. Technical Bulletins dated 17/04/97 published by the Joint Mobility Unit (a service provided by the Royal National Institute of Blind People and Guide Dogs for the Blind Association) stated that the minimum clear path of travel required by an adult + a sighted escort is 1200mm; an adult + guide dog require 1100mm.

It clearly indicates that a minimum 1200mm-wide clear path of travel is required to meet the needs of people with disabilities. This enhanced provision was promoted by the Human Rights and Equal Opportunity Commission in its Advisory Notes for Access to Premises in 1997, and is considered as a fundamental requirement for a disability standard.

The Disability Standards for Accessible Public Transport (DSAPT), in effect since 2002, require accessways to have a minimum unobstructed width of 1200mm. It would make sense to ensure that the provisions under the Premises Standards are consistent with the requirements of the DSAPT.

- 1.2 Lack of consideration of egress and evacuation from multi-level buildings and any possible solutions, such as safe havens for people with mobility impairment and visible emergency warning indicators for people with hearing impairment.
- 1.3 The omission of Class 2 buildings from the draft Premises Standards will open up potential disability discrimination claims. Many City Councils already define housing accessibility and adaptability requirements which have been accepted by the industry. These requirements could have been included to improve housing options and availability of accessible housing, to reduce discrimination, and to support "ageing in place".
- 1.4 Lack of wayfinding provisions for people with vision impairment.



2 GENERAL COMMENTS ON EXHIBITS 9, 10, and 11

This submission makes recommendations for amendments relevant to Exhibits 9, 10, and 11 - draft Australian Standards referenced by the draft Access Code - with particular emphasis on the content of Exhibit 9.

Exhibit 9 is the major reference in the deemed-to-satisfy provisions of the Draft Access Code as it establishes the technical requirements of the Code and is integral to its interpretation and implementation. Its content must be accurate, consistent and unambiguous. Users must be able to respect its authority and the opportunity for varying interpretations must be minimised, if not eliminated.

Referencing an Australian Standard in a Disability Standard, which by definition is an instrument of the Australian Parliament, imposes restraints on the application of any future amendment. Placing it within a Code which is intended to be referenced by the Building Code of Australia furthers these restraints.

It is important that any new Disability Standard recognises its likely longevity and the need to get it right considering that:

- Publications which are integral to an instrument of Parliament cannot be effective unless they are endorsed by the Parliament;
- The Premises Standard, Australian Standards, and the Building Code of Australia have differing timeframes for review;
- The review process takes time, as evidenced in the first 5-year review of the Disability Standards for Accessible Public Transport, which has taken more than 15 months and is still not completed.

Parliament needs to be precise and positive in its consideration of these documents. Standards Australia is likely to take the view that it may only consider amendments nominated by Parliament, because to do otherwise will corrupt the finality of the current review.

Summary of recommendations:

- 2.1 That as a matter of structure, criteria should not be introduced in figures which are not referenced in the text.
- 2.2 That the minimum clear width of travel be 1200mm, applicable to all buildings as it currently applies to public transport buildings.
- 2.3 That a diagram consistent with AS1428.1 Supplement 1- 1993, Figure C2, be included for the A90 wheelchair and reach limits.
- 2.4 That *"ramp"* be redefined as "common ramp".
- 2.5 That *"landings"* be defined as elements separate from ramps.
- 2.6 That the same criteria and limitations apply to both kerb ramp and step ramp.
- 2.7 That any mention or inclusion of tactile ground surface indicators references AS1428.4.
- 2.8 That the requirements for luminance contrast between building elements be defined.
- 2.9 That the requirements for reveals at sliding doors be refined.
- 2.10 That the term *"automatic doors"* be defined.
- 2.11 That the term *"where required"* be defined.
- 2.12 That in areas where alternative products and design solutions are possible, the intent of the provision be defined.
- 2.13 That the term *"where a symbol does not exist"* be defined.



3 DETAILED COMMENTS

Notations used :

- Quotes from the Exhibits are shown in *"italics"*.
- Proposed amendments are shown in **bold red font**.

Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
EXHIBIT 1		
Part 1 Preliminary	Clause 1.4	This Clause should include a <i>"person competent in access"</i> who is integral to the model administrative process (Exhibit 5 "The Protocol"). <u>Proposed amendment</u> Add <i>person competent in access</i> has the meaning given by subsection 2.2 (5).
Part 2 Scope of Standard	Clause 2.1(3)(a)	The meaning of <i>"(a) it is not a part of a building;"</i> is unclear. <u>Proposed amendment</u> Add <i>"(a) it is not a part of an existing building; and"</i>
Part 2 Scope of Standard	Clause 2.1(5)(b)(ii)	It needs to be clarified that <i>"the entrance"</i> means the Principal Pedestrian Entrance .
Part 2 Scope of Standard	Clause 2.2	This Clause should include <i>"Persons Competent in Access"</i> . <u>Proposed amendment</u> Add (1)(d) a person competent in access. (4) a definition of "a person competent in access".
Part 2 Scope of Standard	Clause 2.2(1)	This Clause contains a qualification <i>"to the extent that they are responsible for, or have control over, matters in the Access Code for a relevant building"</i> . This is a most unusual clause and qualification and likely to create a real difficulty in implementation. For example, if the owners accepts an architect's drawings, do they then have responsibility for and have control over the building for matters in the Access Code? The qualification should be removed totally and that it is the responsibility of all to comply as per the intent of the DDA.
Part 3 Requirements of Standards		No comment.



Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
Part 4 Exceptions and Concessions		No comment
Part 5 Review		No comment.
Schedule 1 Access Code Part D	Clause DP1 (a)(ii)	This Clause could be interpreted as excluding a tearoom. <u>Proposed amendment</u> Add <i>"(ii) access work and public places, accommodation and facilities for personal hygiene, areas normally used by the occupants; and</i>
Schedule 1 Access Code Part D	Clause DP4	Appropriate means for evacuation of people with disabilities from multi-storey buildings must be provided, including for example the provision of safe havens.
Schedule 1 Access Code Part D	Clause DP8 Limitation	Alternative arrangement must be provided for vehicles that do not allow valet parking due to the absence of a conventional driver's seat. Some people with disabilities drive while seated in their wheelchair. <u>Proposed amendment</u> Add <i>(c) in the case of (a) and (b) allow use of controlled spaces, accessible from the Principal Pedestrian Entrance, for parking of specially fitted vehicles not suitable for valet parking.</i>
Schedule 1 Access Code Part D	Clause DP9	<u>Proposed amendment</u> Add Such communication system includes AV and TV systems in schools; PA systems in airports, ferry terminals, bus stops and the like.
Schedule 1 Access Code Part D	Table D3.1 Class 1b (a)	In the current draft, access for people with disabilities is required only when there are 4 or more bedrooms or dwellings. This will almost certainly exempt most Bed and Breakfasts, new cabins in caravan parks, and new Eco-lodges. <u>Proposed amendment</u> Change <i>(i) 1 to 10 dwellings</i>



Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
<p>Schedule 1 Access Code Part D3</p>	<p>Table D3.1</p>	<p>Access to the public areas of Class 2 buildings is necessary to ensure that s.23 of the DDA is recognised.</p> <p><u>Proposed amendment</u></p> <p>Add</p> <p>Class 2</p> <p>Common areas</p> <p>From a pedestrian entrance <i>required to be accessible</i>, to the entrance doorway of each <i>sole-occupancy unit</i> located on not less than one level.</p> <p>To and within not less than 1 of each type of room or space for use in common by the residents, including a cooking facility, sauna, gymnasium, <i>swimming pool</i>, common laundry, games room, individual shop, eating area, or the like.</p> <p>Where a ramp complying with AS1428.1 or a passenger lift is installed-</p> <ul style="list-style-type: none"> (i) to the entrance doorway of each <i>sole-occupancy unit</i>; and (ii) to and within rooms or spaces for use in common by the residents located on the levels served by the lift or ramp.
<p>Schedule 1 Access Code Part D3</p>	<p>Table D3.1 Class 9c Common Areas Para 1</p>	<p>Existing clause states:</p> <p><i>"From a pedestrian entrance..... and to the entrance doorway of each sole-occupancy unit located on that level"</i></p> <p>There is little benefit for independent access if a person with disability can only get to the door but cannot enter the unit.</p> <p><u>Proposed amendment</u></p> <p>Add</p> <p><i>"From a pedestrian entrance..... and to and through the entrance doorway of each sole-occupancy unit located on that level"</i></p>



Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
<p>Schedule 1 Access Code Part D3</p>	<p>Table D3.1 Class 9c Common Areas Para 3</p>	<p>Existing clause states: <i>"Where a ramp complying with AS 1428.1 or a passenger lift is installed:</i> <i>(a) to the entrance doorway of each sole-occupancy unit; and"</i></p> <p>There is little benefit for independent access if a person with disability can only get to the door but cannot enter the unit.</p> <p><u>Proposed amendment</u></p> <p>Add</p> <p><i>"(a) to and through the entrance doorway of each sole-occupancy unit; and"</i></p>
<p>Schedule 1 Access Code Part D3</p>	<p>Clause D3.2(2)(b)</p>	<p>This Clause may result in a distance of 100m between accessible entrances.</p> <p><u>Proposed amendment</u></p> <p>Change</p> <p><i>"(b) in a building with a total floor area more than 500 m², a pedestrian entrance which is not accessible must not be located more than 25m from an accessible pedestrian entrance;"</i></p>
<p>Schedule 1 Access Code Part D3</p>	<p>Clause D3.3(b)</p>	<p>People with vision impairment and people with mobility impairment who are ambulant (not using wheelchairs) will use exit stairs in an emergency.</p> <p>Therefore, exit stairs used for general access and <i>"fire-isolated ramps and fire-isolated stairways"</i> must not be excluded from the requirements of AS 1428.1 which include:</p> <ul style="list-style-type: none"> (i) handrails on both sides of stairs; (ii) opaque risers and no projection past the risers; (iii) contrast strip on the tread at the nosing; (iv) warning TGSIs as per AS 1428.4.1. <p><u>Proposed amendment</u></p> <p>Delete <i>"fire-isolated ramps and fire-isolated stairways"</i> from this Clause to read:</p> <p><i>"(b) every ramp and stairway, except for ramps and stairways in areas exempted by clause D3.4, must comply with:"</i></p> <p>Consider upgrade of current BCA requirements:</p> <ul style="list-style-type: none"> - Review the minimum required width of exit stairs which is currently 1m. The clear width should be 1200mm minimum to allow passing which would facilitate speedier evacuation. Research by Jake Pauls, building safety analyst, has shown that the USA current minimum width of stair of 44" is inadequate and he is recommending 56". - Require the installation of handrails on both sides of exit stairs.



Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
Schedule 1 Access Code Part D3	Clause D3.3(d)(i)	It is difficult for most wheelchair users to move in reverse. <u>Proposed amendment</u> Change and Add <i>"(i) passing spaces complying with AS 1428.1 at maximum 9m intervals on those parts of an accessway where a direct line of sight is not available, or at maximum 20m intervals on those parts of an accessway where a direct line of sight is available; and"</i>
Schedule 1 Access Code Part D3	Clause D3.4(f)(ii)	This Clause retains a level of discrimination which is not acceptable under DDA. <u>Proposed amendment</u> Add <i>(iii) where not less than one of each type of common facilities is provided on the entrance storey;</i>
Schedule 1 Access Code Part D3	Clause D3.5(d)	Unless marked, there is no way of keeping the space available for those it is intended for. This Clause should be removed.
Schedule 1 Access Code Part D3	Table D3.5 Class 1b and 3 (a) Number of accessible carparking spaces required	The formula is flawed. The use of a car is integral to the life of people with disabilities. <u>Proposed amendment</u> Delete the whole formula. Add The number of accessible carparking spaces shall be equal to the number of accessible sole-occupancy units or to the number of accessible bedrooms.
Schedule 1 Access Code Part D3	Table D3.5 Class 3, 9a, 9c	Considering our ageing population, the provision of "1 space for every 100 carparking spaces or part thereof" is inadequate. <u>Proposed amendment</u> Add <i>"1 space for every 50 carparking spaces or part thereof"</i>



Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
Schedule 1 Access Code Part D3	Clause D3.7(4)	Public announcements and emergency warning must be audible and visual. <u>Proposed amendment</u> Add <i>"(4) Any screen or scoreboard associated with a Class 9b building and capable of displaying public announcements must be capable of supplementing any public address system, including a public address system used for emergency warning purposes only."</i>
Schedule 1 Access Code Part D3	Clause D3.8(1) (a) and (d)	Fire isolated stairway and fire isolated ramp which are used for general access must not be exempted. <u>Proposed amendment</u> Add <i>"(a) a stairway, other than a fire isolated stairway used for emergency evacuation only;"</i> <i>"(d) a ramp other than a fire isolated ramp used for emergency evacuation only, a step ramp, kerb ramp or a swimming pool ramp; and"</i>
Schedule 1 Access Code Part D3	Clause D3.9(iii)	There is no reason why this Clause should be restricted to a cinema. <u>Proposed amendment</u> Change "(iii)" to (c)
Schedule 1 Access Code Part D3	Clause D3.10(2)(a)	A movable ramp cannot be used independently and may be unsafe in a wet environment. <u>Proposed amendment</u> Delete "or movable ramp"
Schedule 1 Access Code Part D3	Clause D5.2(a) Clause D5.3(a)	Include reference to an appropriate Standard relevant to slip resistance. <u>Proposed amendment</u> Add <i>"(a) have a slip-resistant surface in accordance with CSIRO/SA HB 197; and "</i>
Schedule 1 Access Code Part D3	Clause D5.5(c) and (d)(iii)	Refer to above comment.



Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
<p>Schedule 1 Access Code Part D4</p>	<p>Clause D4.3 (11)</p>	<p><i>"Tactile text must be Arial typeface"</i></p> <p>Arial typeface is not the most suitable for tactile text; especially because its capital "I" (l) is the same as lower case "i".</p> <p>A number of fonts for tactile text exist that are better than Arial typeface, for example Tiresias Signfont.</p> <p><u>Proposed amendment</u></p> <p>Change</p> <p><i>"Tactile text must be sans serif typeface"</i></p>
<p>Schedule 1 Access Code Part F2</p>		<p>The current BCA 2008 Clause F2.5 <i>Construction of Sanitary Compartments</i> permits doors to swing inward if there is a <i>"clear space of at least 1.2m between the closet pan... and the nearest part of the doorway"</i>. The principle here is to enable a person to enter the room if someone collapses in the process of transferring onto the closet pan. The term <i>"doorway"</i> is inappropriate and should be changed to <i>"door swing"</i> if it is to be effective and meet the performance requirements.</p> <p><u>Proposed amendment</u></p> <p>Change</p> <p><i>"unless there is a clear space of at least 1.2m between the closet pan within the sanitary compartment and the nearest part of the door swing"</i>.</p>
<p>A Schedule 1 Access Code Part F2</p>	<p>Clause F2.4</p>	<p>The clause does not recognise that conventional toilets may serve for both genders, that is, that they may be unisex.</p> <p><u>Proposed amendment</u></p> <p>Add</p> <p><i>(i) where unisex sanitary facilities are provided, accessible unisex sanitary compartments must be provided.</i></p>



Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
<p>Schedule 1 Access Code Part F2</p>	<p>Clause F2.4</p>	<p>The clause does not recognise that toilet use is often allocated by factors other than gender – for example, in hospitals, Staff, Patients and Visitors are often allocated specific toilets. Unless this is recognized, a person from one sector who requires accessible facilities may be obliged to use accessible facilities provided for persons of another sector, because accessible facilities for that person's sector have not been provided. The difficulty was managed in the 2004 Access Code for Class 5, 6, 7, 8 and 9 - <i>one accessible unisex sanitary compartment at each bank of sanitary compartments containing male and female facilities</i>. A broader application is recommended.</p> <p><u>Proposed amendment</u></p> <p>Add</p> <p>(j) where sanitary facilities are provided for different groups of occupants, the provisions of Tables F2.4(a) and F2.4(b) apply to sanitary facilities for each group.</p>
<p>Schedule 1 Access Code Part F2</p>		<p>It is noted that there is no Clause F2.3 in the Access Code and that the present BCA Clause F2.3 will apply.</p> <p>This has no requirements for conventional toilets in Class 1B buildings.</p>
<p>Schedule 1 Access Code Part F2</p>	<p>Table F2.4(a) Class 1B</p>	<p>As written, a person who requires accessible facilities must enter a private room to access the toilet if that is where the accessible toilet(s) is/are provided. The person may not be the occupant of that room. All other persons may use a toilet which is commonly available, if one is provided. This seems to discriminate against those who need accessible facilities.</p> <p>Class 1B buildings are of two types, as defined at Table D3.1. They may consist of dwellings let for short-term holiday accommodation, or a boarding house or the like. The buildings may be of considerable size. It is highly likely that common, conventional toilets will be provided</p> <p><u>Proposed amendment</u></p> <p>Delete text in second column and add</p> <p>(a) In every <i>accessible</i> dwelling described at Table D3.1(a), not less than 1; and</p> <p>(b) at each bank of <i>sanitary compartments</i> in common areas, not less than 1; and</p> <p>(c) where bedrooms are provided with private sanitary compartments, not less than 1 private <i>accessible</i> unisex sanitary compartment at each accessible bedroom</p>



Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
Schedule 1 Access Code Part F2	Table F2.4(a) Class 5, 6, 7, 8 and 9	<p>The provision of 1 accessible unisex sanitary compartment on every storey is inadequate where the storey has a large floor area – shopping centres, hospitals warehouse/showrooms and the like. The UK Building regulations manage this by establishing a maximum distance between accessible facilities on the same floor, which seems to work satisfactorily.</p> <p><u>Proposed amendment</u></p> <p>Change (a) to read</p> <p><i>"(a) 1 on every storey containing sanitary compartments provided that the distance between accessible unisex sanitary compartments on any storey shall not exceed 40 metres."</i></p>
Schedule 1 Access Code Part F2	Table F2.4(a) Class 5, 6, 7, 8 and 9	<p>The exception for Class 9a ward areas discriminates against those who require accessible facilities where bathrooms are provided en suite with wards. Other patients may use the adjacent en suite bathroom but those with disabilities must leave the ward and go to a bathroom in a common area.</p> <p><u>Proposed amendment</u></p> <p>Delete the exception in Column 1</p> <p>Add in Column 2</p> <p><i>(c) where sanitary compartments are provided en suite with wards in a Class 9a health-care building, 1 for every 20 en-suite compartments or part thereof.</i></p>
Schedule 1 Access Code Part F2	Table F2.4(b)	<p>The exception for Class 9a ward areas discriminates against those who require accessible showers where showers are provided en suite with wards. Other patients may use the adjacent en suite shower, those with disabilities must leave the ward and go to a shower in a common area.</p> <p><u>Proposed amendment</u></p> <p>Delete the exception in Column 1</p> <p>Add, in Column 2</p> <p><i>(c) where showers are provided en suite with wards in a Class 9a health-care building, 1 shower at every en suite accessible unisex sanitary compartment</i></p>
Schedule 1 Access Code Part H2		No comment.



Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
EXHIBIT 2		
		This was a useful document before Exhibits 9, 10 and 11 were made available. It should now be withdrawn. It does not constitute part of the Disability Standard or any of its referenced documents.
EXHIBIT 3		
		The Guidelines will be a useful tool when the Disability Standards are finalised. Detailed perusal is not productive until that time because their content will depend upon the final content of the Standards.
EXHIBIT 4		
RIS	Summary	The RIS assesses the draft Premises Standard, in part, by the formulation of considerations of "Cost benefits". Whilst these may be of interest to property owners and occupiers they are not relevant to the legal requirement for compliance with an existing Act of Parliament, with the possible exception of considerations of a "negative cost benefit" which may, in certain circumstances, provide grounds for consideration of "unjustifiable hardship" as described in s.11.
RIS	Summary	The RIS is heavily qualified and does not include among its quantitative estimates any intangible benefits. Since the creation of any Disability Standard under the DDA is intended to define the DDA in its particular aspect, and the DDA deals in part with intangible concepts, the usefulness of any RIS in the project is more of political, not practical, value. The RIS admits that it cannot value the impact of the proposed Standard. The DDA is social legislation, not building legislation. To assess a Standard made under its auspices by estimating dollar costs alone misunderstands the nature of the legislation.
RIS	Summary	The process is flawed. The calculations do not take into account those many buildings which already do their best to meet the DDA intent in accessibility. Known examples exist in hospitals, schools, universities, shopping centres, office buildings, residential premises, hotels, carparks, laboratories, theatres, and stadia, as well as government buildings of any type. The most numerous building types by far which lag behind current best practice – and by definition, conformity with the DDA – are the two-storey retail/office building and the public areas of residential buildings. The narrow commercial needs of these particular building types should not drive the broader process. Extension of the application of the Building Cost exercise to all proposed buildings is misleading in the extreme.



Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
		<p>There are building owners and developers in Australia whose building costs under the proposed Access Standard will not increase one cent – in fact, in some cases, they will diminish. The statement nominated at p.112 that <i>"industry focuses on the unjustifiable hardship exemptions provided under the DDA to argue that the current proposals risk going further than the DDA, to the substantial disadvantage of industry and consumers more generally"</i> is untrue if "industry" includes all building owners and managers, not simply those whose interests are commercial.</p> <p>It is acknowledged that buildings which are lawful under the DDA already contribute to the benefits, both tangible and intangible, of that conformity.</p>
RIS	Summary, page 4	<p><i>"However, it is widely accepted that current compliance with existing obligations under the DDA is at low levels, both due to uncertainty as to the specific nature of compliance obligations and due to the complaints-based nature of the enforcement arrangements under the DDA."</i></p> <p>Most aggrieved persons do not enter the complaints process because it is emotionally taxing, very time consuming - which may result in loss of earnings - and there may be significant legal costs involved.</p> <p><u>Proposed amendment</u></p> <p>Changing the 'Complaints based nature of the legislation's enforcement arrangements' to an alternative comparable with, for example, the enforcement provisions for Standards relating to Workplace Health and Safety legislation would go a long way towards remedying this problem.</p>
RIS	Table S2	<p>Table S2 at p.6 ignores both their costs and their benefits. Because they reflect current practice, their additional costs resulting from application of the premises Standard are nil, whereas their benefits, even the tangible ones, are considerable.</p> <p>The RIS does not take into account the cost of rectifying buildings constructed to an incomplete Premises Standard which are still found to discriminate against people with disabilities. When this is added as a "cost risk" the figure for the 2009 Standards would approach more nearly those for the 2004 version.</p>
RIS	Conclusion	<p>The RIS makes much of the comparison with the RIS derived from the 2004 Draft Premises Standard. The inference is that because there is a more advantageous financial outcome, the present Premises Standard is superior. This is most misleading and the Committee should not be swayed by it. The opposite is more likely to be the case.</p>



Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
RIS	Consultation	The account at pp 111-121 illustrates the unresolved dilemma and " <i>polarisation of stakeholder views</i> " remains. The RIS is a valuable document, because it illustrates that polarisation.
EXHIBIT 5		
Article 4	Clause 3	The meaning of " <i>Persons Competent in Access</i> " should be included in " <i>Part 1 Clause 1.4 Interpretation</i> " and " <i>Part 2 Clause 2.2 Persons to whom Standards apply</i> "
Article 7	Clause 2	This could be interpreted as the administration, requiring the Panel members to have their own insurance and indemnity which could have implications under Part 3 of the Act.
EXHIBIT 6		
All		No Comment
EXHIBIT 7		
All		No comment.
EXHIBIT 8		
All		No comment.



Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
EXHIBIT 9		
1 Scope		No comment.
2 Application	Paragraph 3	There appears to be a typographical error. <u>Proposed amendment</u> Add <i>"The Standardbetween 18 and 60 years and may not be appropriate" "</i>
2 Application	Paragraph 4	This Standard must be based on the A90 wheelchair size. Therefore all references to the 80th percentile of wheelchair size must be deleted from the document. <u>Proposed amendment</u> Change <i>"The dimensions in this Standard, relevant to the use of wheelchairs, relate to the 90th percentile wheelchair size and user (see Figure 1).."</i> Delete <i>"80th"</i> and the remainder of the paragraph.
2 Application	Paragraph 5	The referenced research by J Bails is 25 years old. More recent information, for example data obtained during the research by Hunarch Consulting in 2003, should be used.
3 Referenced Documents		<u>Proposed amendment</u> Add AS/NZS HB197 An introductory guide to the slip resistance of pedestrian surface materials.
4 Definitions	4.5 Continuous accessible path of travel	Heading and content must be consistent with Exhibit 10, Definition 1.4.4. <u>Proposed amendment</u> Add <i>"4.5 Continuous accessible path of travel (accessway)"</i> Add A path of travel required to be accessible shall not include a step, stairway, turnstile, revolving door, escalator, moving walkway or other impediment.



Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
4 Definitions	4.14.1 Kerb ramp 4.14.2 Step ramp	There is no logical reason for a step ramp to have a maximum gradient of 1:10 when all the other limitations are the same as those applicable to a kerb ramp, which has a gradient not steeper than 1:8. <u>Proposed amendment</u> Change <i>"4.14.2 Step ramp An inclined surface and a gradient not steeper than 1:8."</i>
4 Definitions	4.16 Slip resistant	The stated definition describes slip resistance. A definition used in Australian Standard should be included.
4 Definitions	4.18 Tactile ground surface indicator (TGSI)	Definition used in this document (Exhibit 9) must be consistent with Definition 1.4.22, Exhibit 10.
5 Dimensions	Paragraph 1	<u>Proposed amendment</u> Add <i>"..... All dimensions are net and by projecting skirtings, architraves, window sills, kerbs, handrails or other fixtures."</i>
6 Luminance Contrast		The current statement does not nominate what building elements are to contrast; it does not nominate what they are to contrast with and it does not specify the level of luminance. <u>Proposed amendment</u> The clause needs to be re-written to reference particular elements (for example, handrails and grabrails, door furniture and switches) noted elsewhere in the text. Add the following to address walls and floors: The junction of walls and floors shall be identified by 30% minimum luminance contrast between the planes. The contrast shall extend a minimum of 50mm either horizontally or vertically from the junction.
7 Continuous accessible paths of travel	Clause 7.3 Width of a continuous accessible path of travel Para 1	<u>Proposed amendment</u> Delete: 1000mm Add: 1200mm This change would align this standard with the Access Code Part H2 Public Transport Building
7 Continuous accessible paths of travel	Clause 7.3 (a)	<u>Proposed amendment</u> Add <i>"(a) Fixtures and fittingsskirtings, architraves, window sills, kerbs, handrails and the like."</i>



Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
7 Continuous accessible paths of travel	Figure 2	<p><u>Proposed amendment</u></p> <p>Delete "1980 mm" unless it is further defined.</p>
7 Continuous accessible paths of travel	Figure 3	<p><u>Proposed amendment</u></p> <p>Delete: 1000mm</p> <p>Add: 1200mm</p>
7 Continuous accessible paths of travel	Clause 7.5 Circulation space for 90 degree or less wheelchair turn	<p><u>Proposed amendment</u></p> <p>Change heading to Turning space.</p> <p>Change text to Where the unobstructed width of the path of travel is less than 1200mm any change of direction greater than 30° shall have a 500mm x 500mm truncation on the inner corner. No truncation is required where the angle of change of direction is less than 30°.</p>
8 Floor or ground surfaces on continuous accessible paths of travel and circulation spaces	Clause 8.4.1 (a)	<p>Text of this Clause should be consistent with Figure 7.</p> <p><u>Proposed amendment</u></p> <p>Add</p> <p>"(a) the pile height shall be not more than 6mm and the base height shall not be more than 4mm "</p> <p>Underlay increases necessary effort to traverse a carpet, often to the degree that movement for a person mobilising independently in a manual wheelchair becomes impossible.</p> <p><u>Proposed amendment</u></p> <p>Add</p> <p>(d) underlay shall not be used.</p>
9 Signage	Clause 9.1(b)	<p>The clause "Where a symbol does not exist..." is meaningless. There is no source referenced for the symbols used in the examples (lift, male, female figurines) and the ISA and ISD are called "symbols" in the text.</p> <p><u>Proposed Amendment</u></p> <p>Delete Clause 9.1(b)</p> <p>Add</p> <p>(b) The International Symbol of Access and the International Symbol for Deafness (see Clause 9.2) may be used without explanatory text such as "accessible", "hearing loop installed". Facilities shall be identified by the use of English words between 1200mm and 1600mm above finished floor levels. Other symbols may be used in association with the text. Where other symbols are used, they shall comply with AS2899.1</p> <p>This Standard will require referencing at Clause 3.</p>



Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
9 Signage	Final "Note"	This note refers to the current BCA Specification D3.6. In Exhibit 1 (Access Code) this was changed to Part D4. Ensure cross-reference is correct.
9 Signage	Figure 8 (d)	Signage indicating handing (RH or LH) of sanitary compartment for people with ambulant disabilities is unnecessary. As illustrated in Figures 54 and 55, there is no handing for these toilets; the pan is in the centre of the compartment with grabrails on both sides. <u>Proposed amendment</u> Delete handing signage (RH or LH).
10 Tactile Ground Surface Indicators		Refer to comments on Exhibit 10.
11 Walkways, Ramps and Landings	General	Review provision of different gradients for step ramps, kerb ramps and threshold ramps to standardise both gradients and landings. "Ramps" should be defined as common ramp . "Landings" should be defined as elements separate from ramps and walkways.
11 Walkways, Ramps and Landings	Clause 11.1 (d)	Bitumen can be rough or smooth and when smooth is worse than concrete. This provision on bitumen surface also creates confusion. <u>Proposed amendment</u> Delete all reference to bitumen surface.
11 Walkways, Ramps and Landings	Figure 13	Clear width of accessway should be shown between handrails. <u>Proposed amendment</u> Delete "1000" (which included handrails) Add Indicate "clear width of path of travel" (between handrails).
11 Walkways, Ramps and Landings	Figure 20	Incorrect reference to related Figures. <u>Proposed amendment</u> Change "See Figure 30"
11 Walkways, Ramps and Landings	Figure 21	<u>Proposed amendment</u> Add Define where taper starts, i.e. at side of opening or at edge of circulation space at doorway as per Figure 30.



Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
11 Walkways, Ramps and Landings	Clause 11.7 Step ramps Clause 11.7.1 (a), (b), and (c) Figures 22a, 22b	<p>There is no logical reason for a step ramp to be different from a kerb ramp in terms of its design criteria and limitations.</p> <p>External step ramps at entrance to building illustrated in Figure 22(b) should be no different to in-line kerb ramps on narrow footpaths illustrated in Figure 24 (c).</p> <p><u>Proposed amendment</u></p> <p>Change general requirements stated in text and figures to be consistent with kerb ramps in all details.</p>
11 Walkways, Ramps and Landings	Clause 11.7 Step ramps Paragraph 3	<p>Figure 23 and some Figures in Appendix C of Exhibit 10 indicate angle of splay less than 45°. This should be allowed as it is not always possible to achieve a 45° angle.</p> <p><u>Proposed amendment</u></p> <p>Add</p> <p><i>"The edges of step ramp shall have a 30° - 45° splay wherecross traffic."</i></p>
11 Walkways, Ramps and Landings	Figure 23 Clause 11.8.2 (ii)	<p>As illustrated in Figure 23 it is not always possible to achieve a 45° splay in corner locations. Text should match diagrams/illustrations.</p> <p><u>Proposed amendment</u></p> <p>Change</p> <p><i>"(ii) The edges of a kerb ramp shall be tapered or splayed at 30° - 45°."</i></p>
11 Walkways, Ramps and Landings	Figure 24(a) Figure 24(b)	<p>Top and bottom landings must be 1500mm long.</p> <p><u>Proposed amendment</u></p> <p>Change</p> <p>Amend Plan View to indicate 1500mm bottom landing consistent with Section A-A.</p>
12 Stairways	Figures 25(a) and 25(b)	<p>These diagrams illustrate stairway location and handrail extensions.</p> <p>TGSIs are the province of Exhibit 10 (AS 1428.4) and should only be shown here in dashed lines.</p> <p><u>Proposed amendment</u></p> <p>Delete [Figure 25(b)] all dimensions relevant to TGSIs.</p> <p>Amend [Figure 25(b)] end of handrail extensions on Plan.</p> <p>Add [Figure 25(a)]</p> <p><i>"900mm min or 1100mm min"</i> from nosing to boundary.</p>



Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
12 Stairways	Clause 12.1(e)	<p>There should be no or minimal projection past the riser as it is a trip hazard for some people.</p> <p><u>Proposed amendment</u></p> <p>Change</p> <p><i>"Stair nosings shall not project more than 3mm past the riser." An inclined riser may project up to 25mm beyond its base. "See Figure 26."</i></p>
12 Stairways	Figure 26	<p>Diagram must be consistent with text of Clause 12.1(g), i.e. that the contrast strip shall be provided on the tread.</p> <p>The contrast strip must not extend over the riser as this makes it difficult for people with low vision to identify the actual edge of the tread when going up the stairs, therefore creating a serious hazard of mis-step.</p> <p><u>Proposed amendment</u></p> <p>Delete "strip of contrasting colour 25 to 50".</p> <p>Delete contrast strip on the riser.</p>
12 Stairways	Clause 12.2(g)	<p><u>Proposed amendment</u></p> <p>Add</p> <p><i>(g) The 300mm extension is not required in the inner handrail at intermediate landings where the treads are staggered." See Figure 27.</i></p> <p>Add</p> <p>Illustration of stairs where the treads at intermediate landing are in line, requiring the 300mm extension. [Refer to Figures 6(a) and 6(c), AS 1428.2-1992.]</p>
12 Stairways	Clause 12.2(g)	<p>There is a need to consider how stair handrails meet balustrades at a landing, which are required to be 1000mm high. It needs to be determined whether one or both of the following two options is(are) acceptable:</p> <ul style="list-style-type: none"> - If the change in direction (from angled to horizontal) of the handrail is to occur in line with the edge of the landing as per Figure 25(a), then the stair handrail needs to be 1000mm high. This is within the specified 865mm to 1000mm range but may be too high for some people. - If the stair handrail is 900mm high, the change of direction will occur at a point past the edge of the landing.
13 Handrails	Clause 13(e)	<p>Incorrect reference.</p> <p><u>Proposed amendment</u></p> <p>Amend</p> <p><i>"The height of with Item (d), shall any landings."</i></p>



Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
14 Doorways, Doors and Circulation Space at Doorways	Clause 14.1 Paragraph 1	Define "high luminance contrast". <u>Proposed amendment</u> Change <i>"Doors forming partshall have not less than 30% luminance contrast" "</i>
14 Doorways, Doors and Circulation Space at Doorways	Clause 14.1	<u>Proposed amendment</u> Add (e) door jamb and adjacent wall.
14 Doorways, Doors and Circulation Space at Doorways	Clause 14.2 Visual indicators at glazed doors and sidelights	Clause 6.8 does not exist and needs to be defined. Define the minimum height, width and location of glazed viewing panels in doors and fire doors (where maximum glass area is specified, which is less than required by AS1428.1-2001 Clause 7.5.2).
14 Doorways, Doors and Circulation Space at Doorways	Clause 14.4.3 Sliding doors	This section requires an introduction which applies to all sliding doors. <u>Proposed amendment</u> Add The clear circulation space at doorways with sliding doors is based on the clear opening width of the doorway (D). The clear circulation space shall not be less than the dimensions specified in the tables in Figure 31 for the appropriate clear opening width. Where a sliding door is powered, and the approach is from the front, circulation space at WL is not required. [See Figure 31(d)]
14 Doorways, Doors and Circulation Space at Doorways	Clause 14.4.3.1 Cavity sliding doors	<u>Proposed amendment</u> Amend <i>"Where in Figure 31 for width (D)."</i> Delete "WH" <i>"Where a sliding door is automatic, for a front approach the WL dimension does not apply."</i>
14 Doorways, Doors and Circulation Space at Doorways	Figure 32 Door approach	There appears to be reference errors. <u>Proposed amendment</u> Amend Line 1: "Figure 31(d)" Line 2: "Figure 31(a), (b), (c)"



Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
14 Doorways, Doors and Circulation Space at Doorways	Clause 14.4.4 Automatic doors	<u>Proposed amendment</u> Change "automatic doors" to powered doors. Add Where a sliding door is powered, and the approach is from the front, circulation space at WL is not required. [See Figure 31(d)] Amend "For location of manual controls for powered doors, see Clause 14.6.3."
14 Doorways, Doors and Circulation Space at Doorways	Figure 34(c)	<u>Proposed amendment</u> Amend Show dimension as clear dimension between back of handle and face of door, consistent with Figure 34(b).
14 Doorways, Doors and Circulation Space at Doorways	Clause 14.6.3 Location (Line 1)	<u>Proposed amendment</u> Add "Except in early childhood centres and swimming pool barriers or similar where". Note: Example of a "similar" facility is the children's part of a hospital.
15 Switches and general purpose outlets (power points)		No comment.
16 Sanitary Facilities	Clause 16.2.5(d) Figure 41(a) Figure 41(b)	A review is necessary to eliminate conflicting requirements, such as: <ul style="list-style-type: none"> - Installation of a backrest as a separate item would effectively prevent the use of a toilet seat with cover (double-flap toilet seat). - The backrest obstructs the 600mm clearance required from the front of the pan to "the front of any back-wall-mounted fixture or obstruction" regardless of whether a single-flap or double-flap toilet seat is installed. It must be determined whether or not this 600mm clearance is still relevant and required. - Conflicting dimensional limitations relevant to backrest vertical height, its position above the toilet seat, and height of top of backrest above floor level (a.f.l.) - It is irrelevant how far down the back rest extends as long as its vertical height and the height a.f.l. of top of backrest are determined.



Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
<p>16 Sanitary Facilities</p>	<p>Clause 16.2.5(d) Figure 41(a) Figure 41(b)</p>	<p><u>Proposed amendment</u></p> <p>Amend / Add</p> <ul style="list-style-type: none"> - Correction to title of Figures 41(a) & 41(b). - Toilet pan and cistern should only be shown diagrammatically avoiding irrelevant details. - The diagram should be applicable for the use of either a concealed or an exposed cistern. - Angle of backrest shall be 100° to 105°. (This will allow the toilet seat flap to stay up when required, either during toilet use or cleaning.) - "Top of backrest 850 to 860 minimum" (above floor level) - "Lower edge of backrest 650 maximum" (above floor level). - Illustration of backrest and cistern must be clearly separated to avoid confusion. [This applies especially to Figure 41(a).]
<p>16 Sanitary Facilities</p>	<p>Figure 43</p>	<p>Staff call button is sometimes required. It would be useful to include its position in this diagram.</p> <p><u>Proposed amendment</u></p> <p>Add</p> <p>Staff call button location in line with and before the zone for toilet paper dispenser.</p>
<p>16 Sanitary Facilities</p>	<p>Clause 16.2.10</p>	<p>In case of emergency where a person collapses or falls out of the wheelchair, there must be adequate clearance inside the toilet to enable a person to push the door open a fraction and enter the room to render assistance.</p> <p><u>Proposed amendment</u></p> <p>Add [after Clause (a)]</p> <p>(b) Inward opening doors shall allow a clear space of at least 1.2m between the closet pan and the nearest part of the door swing.</p>



Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
16 Sanitary Facilities	Clause 16.2.10	<p>Privacy in everyday use should not be compromised by emergency provisions. It is important for the users to be confident of their privacy. Some applications use escape latchsets whereby it unlocks when the user checks the engagement of the latch. These latchsets are unsuitable. The proposed amendment disqualifies them.</p> <p><u>Proposed amendment</u></p> <p>Add [existing Clause (c) becomes (d)]</p> <p><i>(d) "Doors The latch mechanism shall be operable from the outside in an emergency but otherwise shall not be openable from the outside. The door mechanism shall enable the user to verify that the door is secure from unintended or unauthorised entry."</i></p>
16 Sanitary Facilities	Clause 16.4.1 Paragraph 1	<p>At least one mirror must be provided.</p> <p><u>Proposed amendment</u></p> <p>Delete "where provided" from paragraph 1.</p> <p>Change text in 2nd sentence.</p> <p><i>"A vertical mirror with finished floor. Alternatively, a vertical mirror with a reflective surface not less than 350mm wide, shall extend from of the finished floor."</i></p> <p>Add</p> <p><i>In all sanitary facilities, the mirror shall be located either above or adjacent to the washbasin.</i></p>
16 Sanitary Facilities	Clause 16.4.3	<p>At least one item of each type must be provided.</p> <p><u>Proposed amendment</u></p> <p>Delete "where provided".</p> <p>Change text</p> <p><i>"Soap dispensers, paper towel dispensers or hand dryers, and similar fittings shall be installed with be operable by one hand."</i></p>

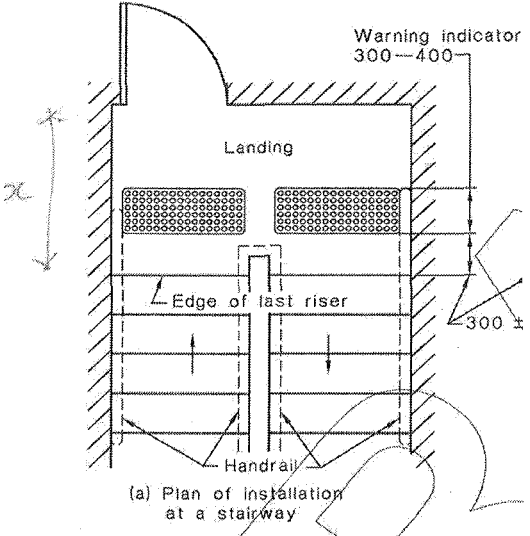


Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
16 Sanitary Facilities	Clause 16.5.2 (b) & (c) Figure 49	<p>The gradients required in 16.5.2 (c) are extremely difficult, if not impossible, to achieve in practice where the recess is 1100 x 1600 and the floor waste is located as per Fig. 49</p> <p><u>Proposed amendment</u></p> <p>Amend & Change text and diagram</p> <p><i>(b) The waste outlet for the showerwith Figure 49."</i></p> <p><i>(c) The slope of the floor of the shower recess shall have a gradient between 1 in 50 and 1 in 80 and the floor waste shall be located at 550±25 from 3 sides of the shower recess (see Figure 39 and Figure 49)."</i></p> <p>Consider</p> <p>Provision of a continuous grated trench in the shower recess in lieu of the floor waste, which will minimise conflicting slopes and make it easier to achieve the required floor gradients. This has been shown to work and would be a good alternative.</p>
16 Sanitary Facilities	Clause 16.5.6	<p>In a facility shared with ambulant users, the shower head is frequently left in a position higher than 1350mm a.f.l.</p> <p>A product exists that allows the shower head holder to be pulled down from a seated position.</p> <p><u>Proposed amendment</u></p> <p>Add</p> <p><i>(d) Allow the shower head holder to be pulled down from a seated position by means of a lever or the like.</i></p>
16 Sanitary Facilities	Figure 51(b) Figure 53	<p><u>Proposed amendment</u></p> <p>Amend</p> <p>Centreline of WC pan: "450 to 460"</p> <p>Centreline of wash basin: "425 min."</p> <p>Add</p> <p>Dimensions to locate the coat hooks relevant to the shower seat.</p>



Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
16 Sanitary Facilities	Clause 16.7.5	<p>The coat hook(s) must be accessible from a seated position (a wheelchair user).</p> <p><u>Proposed amendment</u></p> <p>Delete existing text.</p> <p>Add</p> <p>Coat hook(s) shall be installed between 1200mm and 1350mm from the finished floor and not less than 500mm out from any internal corner. Where associated with a shower recess configured as shown in Figure 51(b) they shall be placed on the wall within reach of a person seated on the folding seat.</p>
18 Assembly Buildings	Figure 56(a) Approach from the rear	Clearance in front of wheelchair must allow a person to pass, i.e. 450mm minimum (walking sideways, which is common in auditoria).
18 Assembly Buildings	Figure 56(b)	Plan and Section A-A do not match.
18 Assembly Buildings	Figure 56(c)	<p><u>Proposed amendment</u></p> <p>Amend</p> <p>Section A-A: Show level floor relevant to wheelchair position, consistent with Plan.</p>



Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
EXHIBIT 10		
Section 2	Clause 2.2.2(g) Figure 1	The application of this Clause will result in a TGSi area of less than $300 \pm 10\text{mm}$. <u>Proposed amendment</u> Change <i>“(g) where discrete warning TGSIs are used, the arrangement shall be as shown in Figure 1 with a minimum of 7 discrete warning TGSIs.”</i>
Section 2	Clause 2.2.2(b) Clause 2.2.2(g)	The requirements of these Clauses cannot be achieved for a curved line illustrated in Figure 5.
Section 2	Figure 2 (a)	This layout is applicable to the main floor of most stairs. It is understood that the provision of 300mm deep warning TGSIs is based on the expectation that a person who has to open the door to get to the stairs would not be walking at a rapid pace and thus would be able to detect the shallower warning TGSIs. However, this would only apply where the distance from edge of last riser to doorway (marked as "X" in diagram below) is short. This provision could be misleading if the distance allows the person to walk fast.  <p>(a) Plan of installation at a stairway</p> <u>Proposed amendment</u> Add Define the distance from edge of last riser to doorway (marked as "X") for the application of 300mm-deep TGSIs, beyond which 600mm-deep TGSIs must be provided.

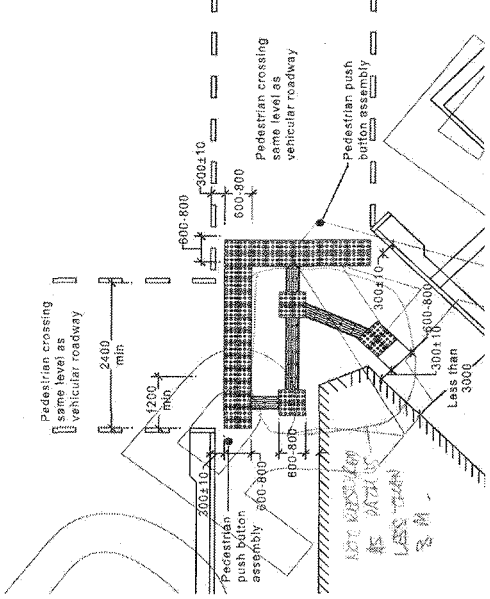
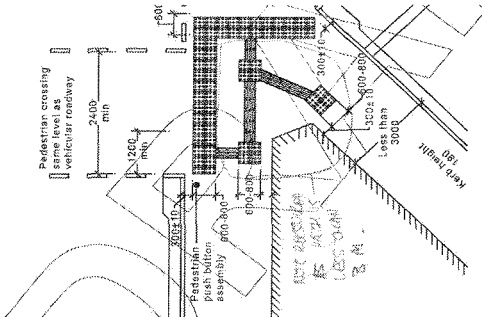


Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
Section 2	Figure 2 (c)	<p><u>Proposed amendment</u></p> <p>Add</p> <p>300mm-deep warning TGSIs shall be provided where handrails at enclosed landing are not continuous.</p>
Section 2	Figure 4	<p>Manufacturers of walking walkways and the like often will not warranty an installation if TGSIs are added to service access plates which are often within the area indicated.</p> <p><u>Proposed amendment</u></p> <p>Add</p> <p>A provision for flexibility or a note to consider this situation.</p>
Section 2	Figure 7	<p>A sloping wall or structure along the path of travel may pose a hazard.</p> <p>There should be a clause defining the requirement for warning TGSIs in such situations where a clear height of 2000mm is not achieved.</p> <p><u>Proposed amendment</u></p> <p>Add</p> <p>In the absence of a suitable barrier, warning TGSIs shall be installed as shown in the diagram below where a clear height of 2000mm is not achieved within 300mm from the base of the sloping structure.</p>
Section 2	Figure 9	<p>The illustration shows 7 bars within a 300mm-wide (150 + 150) directional TGSi. This is not consistent with the design/spacing shown in Figure 8 and in conflict with the note "300 – 400 wide".</p> <p>The illustration should either be drawn accurately or be shown diagrammatically only and "300 – 400 wide" consistently shown.</p>
Section 2	Figure 11	<p>Directional indicators at bus stops should start at 300±10mm from the building line to be consistent with the provision at mid-block crossing.</p>

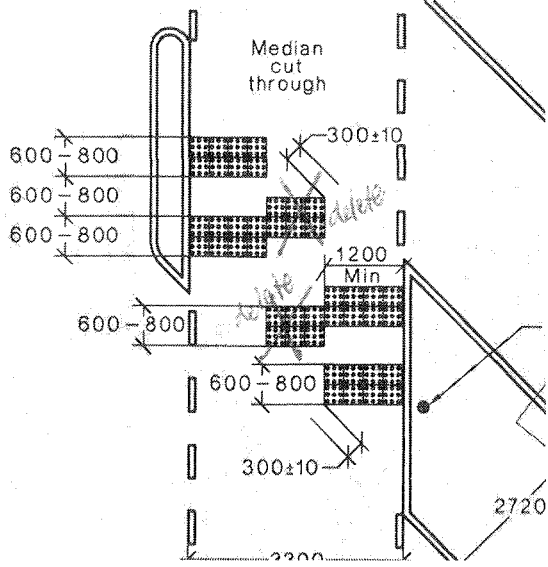
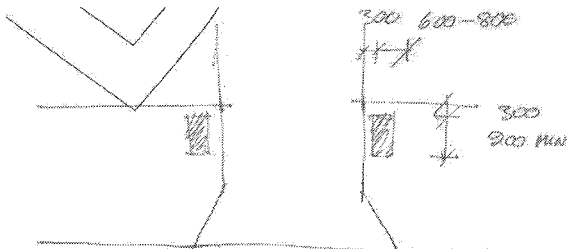


Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
Appendix C	General	<p>The 1200mm clear access width (B) as per Figure C1 is supported.</p> <p>This must be retained and be included in Exhibit 9.</p> <p>This comment applies to other drawings in this document (Exhibit 10).</p>
Appendix C	Figure C2(A)	<p>In the built environment, the road curve generally has a greater radius than shown in the diagrams. It would be helpful to include a diagram illustrating this situation and its effect on the design of the kerb ramps.</p>
Appendix C	Figure C2(D) (E) (F)	<p>Figure C2(D) should be titled "dual entry crossing points" as per Figure C2(F).</p>
Appendix C	Figure C2(C) Figure C8 (page 48)	<p>The minimum angle permissible on the splayed edge should be defined as it is not always possible to achieve a 45° angle.</p>
Appendix C	Figure C8 (page 49)	<p>Applying the principle of locating warning TGSIs at 300mm from a hazard in the direction of travel, the 300mm distance should be "x" as indicated in the diagram below.</p> <p>This comment applies to other figures as well.</p> <div data-bbox="925 1043 1340 1292" data-label="Diagram"> </div> <p><u>Proposed amendment</u></p> <p>Amend</p> <p>Indicate 300mm dimension from warning TGSIs to the kerb in the direction of travel.</p>



Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
<p>Appendix C</p>	<p>Figure C9 (page 51) Detail B</p>	<p>Directional tiles are generally not required where footpath is less than 3m.</p> <p>If this diagram is meant to indicate that directional TGSIs are required in complex situations, regardless of footpath width, then this provision should be included in the text of a Clause.</p> 
<p>Appendix C</p>	<p>Figure C9 (page 51) Detail A</p>	<p>Refer to comment above on Detail B.</p> 



Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
<p>Appendix C</p>	<p>Figure C10 Median Crossing</p>	<p>Placement of 1200mm-wide TGSIs to both sides of the cut through provides adequate guidance.</p> <p><u>Proposed amendment</u></p> <p>Delete warning TGSIs in the centre. See diagram C10(a) below.</p>  <p>Fig. C10 (a)</p> <p>The same principle should apply to Figure C10 (b).</p>
<p>Appendix C</p>	<p>Figure C12</p>	<p><u>Proposed amendment</u></p> <p>Amend</p> <p>Figure C12 to illustrate pedestrian path and vehicular crossing as shown in sketch below.</p> 
<p>Appendix D</p>	<p>Figure D1</p>	<p>It would be useful to include an illustration of a bus stop separated from the kerb by the footpath.</p>



Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
EXHIBIT 11		
Section 2	Clause 2.2.1(e)	The bollard should be easily seen by pedestrians with low vision and drivers. <u>Proposed amendment</u> Add Bollard shall be not less than 1050mm high with 30% luminance contrast at all times when viewed against the background or be provided with contrasting and reflective band not less than 75mm wide at a height between 900mm and 1000mm above ground level.
Section 2	Figure 2.3	Figure 2.3 must be consistent with Figure 2.2. <u>Proposed amendment</u> Add 5400 to indicate length of parking space
Section 2	Clause 2.3	Drivers may drive forward or reverse into the dedicated parking space. Therefore the whole dedicated parking space must be clear of any obstruction. <u>Proposed amendment</u> Add There shall be no wheel stops in parking spaces for people with disabilities. Note: This requirement was in Section 6.3 of DR04021-2004 (Draft Parking Standard released in 2004 for public comment).
Section 2	Figure 2.5	Walkway as shown in this diagram does not align with Exhibit 9, Clause 11.2(a), which requires the ground surface abutting the sides of the walkway to extend horizontally for a minimum of 600mm. <u>Proposed amendment</u> Amend width of walkway.
Section 2	Figure 2.6 Section A-A	Refer to comment and proposed amendment above relevant to Figure 2.5. Dimensions of parking space in Figure 2.6 must be consistent with those in Figures 2.4 and 2.5. <u>Proposed amendment</u> Delete "7000" Add 7800 to indicate length of parallel parking space. Delete line shown in the middle of the kerb ramp.



Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
Section 2	Clause 2.4 Paragraph 1	Minimum headroom in the vehicular travel path must accommodate taller vehicles which are becoming more widely used by people with disabilities, especially by those who remain in their wheelchair while in transit. <u>Proposed amendment</u> Delete "2200mm" Add 2300mm This was included in DR04021 (2004), Clause 6.4.
Section ?	New Clause	<u>Proposed amendment</u> Add requirements relevant to boom gates, accessible ticket machines, and accessible pay station machines.