

Submission No 24

Draft Disability (Access to Premises - Buildings) Standard

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Submission to the
Federal Parliament's Legal and Constitutional Affairs Committee

From

Barry Bennett

Comment on the draft Access to Premises Standard:

Home unit blocks and other Class 2 buildings, under the Building Code of Australia (BCA), are not included in the current draft standard. It is considered that there will be a public expectation that at least the common areas, front entry and access corridors to rooms are accessible so that people with disabilities can at least visit people in apartment buildings. It is probably desirable to have a minimum number of the apartments dimensioned so that in the future they could be converted for access if necessary. A number of planning schemes are incorporating these features in their approval process.

On occasions designers want to use the public footpath/road reserve as a means of access to and from various accessible features in a building or on a private lot. It would be helpful if the standard could address this situation and provide some guidance as to when the use of the road reserve is appropriate. My thoughts is that the use of the road reserve could be appropriate if the path of travel complies with relevant Australian Standards, or the building is designed so that able bodied persons must use that route as well?

Performance Requirement DP4 of the BCA requires applicants to consider the provision of exits for people of all characteristics and mobility. The deemed to satisfy provisions of the BCA do not consider egress for people with disabilities. This inconsistency should be addressed as it causes confusion. In the draft fire isolated stairs are exempt from access requirements that assist people with vision impairment and people with ambulant disabilities.

Currently the BCA provides concessions under D3.3 for the amount of a Class 6 or 9b building that needs to be accessible. This concession does not apply to other classes such as Class 5 (office) which causes confusion. Some guidance as to how much of a floor and what facilities should be accessible is desirable.

The BCA and Australian Standards do not provide guidance on disabled access to fitting rooms in retail premises. This is a DDA issue.

The Australian Standards covering lifts need to be reviewed to ensure all lifts including hoists and stair climbers are accessible and safe. Some groups consider that the use of lifting devices can be discriminatory due to the exposure of the user. Some guidance is desirable.

Some guidance on how many steps constitute a different level not requiring access would be useful. Is a single step which divides a full floor area such as a sunken living area or lounge area allowable or should full length tactiles and handrails be provided - perhaps a ramp?

Some issues such as slipperiness for floor finishes and vision marking on glass which are noted in the Australian Standards for guidance should be incorporated in the Codes as mandatory.

Some guidance on access to temporary events, such as scaffold grandstands and other short term facilities, would be desirable.

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