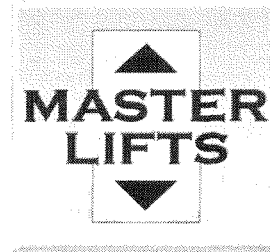


CENTRAL CORRESPONDENCE OFFICE
P.O. BOX 617, Virginia QLD 4014
63 Yarraman Place, Virginia, Brisbane, QLD 4014

Phone: (07) 3265 6344 Fax: (07) 3265 6044
Email: director@masterlifts.com.au



ABN 26 112 048 343

12 March 2009

Committee Secretary
House of Representatives Standing Committee on
Legal and Constitutional Affairs
PO Box 6021
Parliament House
CANBERRA ACT 2600

SM
RECEIVED
13 MAR 2009

BY: LACA

Dear Sir/Madam

Re: Disability (Access to Premises – Buildings) Standard 2009

We wish to congratulate those responsible for the preparation of the consultation draft. We also offer our thanks for the opportunity to offer constructive comment on the draft.

Our experience: We have been in the lift industry for over sixteen years as importers, manufacturers and installers. Our company has offices in all States, with a focus on lifts for persons with disabilities, the lifts covered by AS1735 Parts 7, 14, 15 and 16, as well as AS1735 Part 12.

These are the lifts that are the focus of the Premises Standard 2009, as seen in Tables E3.6. (a) and (b)

Our comments will be brief and be focussed on what we believe are important points.

We submit that “reasonably achievable, equitable and cost effective access to buildings” can be more comprehensively ensured by amendments to the following two areas:

1. **Part E3.6 Passenger Lifts**
2. **Part D5 Accessible water entry/exit for swimming pools.**

1. We refer to pages 41, 42 and 43 of the draft Premises Standard.

E3.6 Passenger Lifts

In an *accessible* building, every passenger lift must:

(b) have *accessible* features in accordance with Table E3.6 (b)

Our conclusion, after sixteen years of concentrated experience with specifically the lifts for people with disabilities, is that Tables E3.6(a) and Table E3.6 (b) are, generally, accurate and appropriate.

Increasing the minimum floor dimensions of all passengers lifts to 1100mm x 1400mm is very important (Box 3) Also having a minimum clear door opening of 900mm (Box 4), and having a passenger protection system - a curtain of light - (Box 5) are important safety features on lifts for the disabled. Emergency hands free communication (Box 11) is another very important feature.

However, there are three anomalies in Table E3.6 (b) that we believe should be, and can be, addressed very inexpensively. They are in regards to AS1735 Part 14 low rise platform lifts that travel vertically up to one metre.

Let us briefly explain:

We believe that there is, generally, a lack of appreciation of the numbers of Part 14 lifts that are required in public buildings for use by persons with disabilities. Further, because the travel distance is only a metre, they are thought by many, particularly building owners, to be not as important as other vertical lifts that have a greater travel distance.

Page 118 of the Regulation Impact Statement at the end of the first paragraph under the heading **Comment received, states:** *“Apart from commercial lifts, AS1735.16 lifts have played a greater part than any other lift in providing public and private access for people with a disability”.*

For lifts that travel between two or three levels, this is true.

However, it is universally agreed by architects, access consultants and suppliers who provide lifts for people with disabilities, that the lift type most commonly required is the low rise platform lift, covered by AS1735 Part14, with a vertical travel distance of up to one metre.

For example, over the last three years our company has installed 124 Part 16 lifts. During the same period, our company has been involved with the installation of 240 Part 14 low rise platform lifts.

Why is the Part 14 lift so frequently required?

Because there are many existing public buildings with three or four step entrances or with mezzanine areas that have been built to be accessed by three or four steps. Most stages are also this height.

Following are the three anomalies in Premises Standard Page 42, Table E3.6 (b) that need to be addressed together with actual costs for the modifications.

1. Box 1. (Appendix A) Handrail complying with the provision for a mandatory handrail in AS1735 Part 12.

For some reason, low rise platform lifts complying with AS1735 Part 14 have been excepted from having a handrail complying with AS1735 Part 12.

No architect or access consultants with whom we have spoken can give a reason why Part 14 lifts should be excepted.

The reasoning offered by all access professionals with whom we have spoken is that the persons with disabilities who would be using the Part 14 lifts would be the same persons and have the same range of disabilities as those using the Part 2, 3, 15 or 16 vertical passenger lifts. These latter lifts all have to have a compliant handrail. It is no less important to have such in a Part 14 lift even though its travel distance is less. We concur with this reasoning.

Our recommended amendment:

**Table E3.6(b) Application of features to passenger lifts,
Box 1, Application column:**

Remove: (b) a low-rise platform lift complying with AS1735.14

Outcome: Handrails will comply with AS1735.12 – 5.3

Cost: Maximum \$100.00

2. Box 8 E3.6 (b) states that Part 14 low rise platform lifts are excepted from requiring car and landing control buttons complying with AS1735 Part 12.

The above AS 1735 Part 12, section 7 actually covers two features:

- a) the car stations (panels) containing the buttons; and
- b) the control buttons

a) Car stations (panels).

The actual wording from the code is as follows:

AS1735 Part 12 - 7.2.1 Number of control panels

Where either the width or depth of the car, as defined in AS1735 Part 12, is less than 1400mm, not less than two control panels shall be provided in positions that are accessible, one to the left and one to the right of a person entering a lift car.

This is for the convenience of persons with upper body mobility problems and those who require the choice of car sides that they can reach.

b) Control buttons - Braille and tactile buttons AS1735 Part 12.

Braille and tactile signs, indicators and buttons are constantly specified throughout the Premises Standard. These are required for the vision impaired.

The actual wording from the code is as follows:

AS1735 Part 12 - 7.2.2 Control buttons on control panels

A tactile symbol and braille equivalent, located above or to the left or on the face of the respective buttons, shall be provided.

Our recommended amendment:

**Table E3.6(b) Application of features to passenger lifts,
Box 8, Application column:**

Remove: (b) a low-rise platform lift complying with AS1735.14

Outcomes: A second car station must be fitted
Braille and tactile buttons must be fitted
Lift car and landing control buttons must comply with AS1735.12

Cost: Second car station - \$340 including fitting
Braille and tactile buttons - \$220.00

Table E3.6 (b) - Box 1 and Box 8 - in its present form are excluding beneficial low cost features for the disabled persons in Part 14 low rise platform lifts, when at the same time, the features have been specified as essential for all of the other four vertical lift types. We strongly recommend that Table E.3.6 (b) be modified to have the above three features included in Part 14 lifts. We have set this out in Appendix A.

Summary: For many years councils have been asking developers and building owners to install low rise platform lifts for disabled persons to access mezzanine areas in new buildings or when renovating existing buildings. Even though architects, designers and other professionals have been endeavouring to have lifts installed that were of sufficient floor dimensions and that have features that catered for the needs of disabled persons, frequently, buildings owners installed small, under sized platform lifts that were imported. In many cases these small inadequate lifts began life in their country of origin as small goods lifts and have been adopted for use as passenger lifts in Australia.

Where the draft Premises Standard speaks of “cost effective access”, we don’t believe it means the cheapest possible, regardless of the lack of appropriate features. As we have shown with real costings, it takes very little additional money to make low rise platform lifts with the correct platform dimensions compliant with AS1735 Part 12 and suitable for use by disabled persons.

No one should have to pay more for lifts than is necessary. However, rather than allow lifts to be installed only because they costs a little less, and giving no attention to the fact that they are a long way short of AS1735 Part 12 requirements, seems to be a mockery of our promise to give equitable vertical access when it is very reasonably achievable and cost effective as we have shown.

One of the many building surveyors with whom we have had dealings who is also concerned with the number of inadequate non compliant Part 14 lifts that are being installed, offered this reasoning:

“I think it’s like bridges. Is a short bridge less important that a long bridge? Just because a bridge is shorter, would it be right to allow it to be narrower? To not have proper safety signs? Or have signs that could not be read?”

We believe that the bench marks of AS1735 Part 12 should be applied to imported lifts to ensure they comply with the new Premises Standard.

In reality, there are cost effective low rise platform lifts being manufactured in Australia now that architects and other professionals approve as being suitable for use by disabled persons. They have the 1100mm x 1400mm platform dimensions, compliant handrails, 2 car control stations as well as braille and tactile buttons.

We also believe that Standards Australia should be directed to upgrade AS1735 Parts 14 and 15 to the only real standard for lifts for persons with disabilities, AS1735 Part 12 as acknowledged in the Premises Standard, Page 42.

Table E3.6 (b) and page 48. H26 Lift facilities must comply with AS1735 Part 12.

In passing, it should be pointed out that there are also imported lifts being sold and installed in Australia as being compliant with AS1735 Part 15 when they fall a long way short of the requirements of Part 15.

2. We refer to pages 38 and 39 of the draft Premises Standard.

Part D5 Accessible water entry/exit for swimming pools

D5.4 - Platform swimming pool lift

D5.5 - Sling-style swimming pool lift

As importers, manufacturers and installers of swimming pool lifts for over sixteen years we have seen a multitude of lifts to aid the entry/exit of people into swimming pools and spa baths. Hydrotherapy is vital for a large range of conditions.

The vast majority fall into two main types:

A Pool lifts with rigid seats for people with good upper body mobility who cannot enter/exit the pool unaided. These are used by people transferring from wheelchairs as well as people who are not wheelchair bound.

B Pool lifts with slings for people with poor upper body mobility. These are usually used by people who require a wheelchair for mobility.

In public pools that are not specifically for less abled people, some authorities have installed pool lifts that have both seats and slings that can be interchanged depending upon the user.

Type A pool lifts are by far the most widely used in Australia, as well as America, Europe and many other countries.

Appendix B shows a range of the seat-style swimming pool lifts that are available and in common use throughout Australia.

We submit that a further section be added to Part D5 to allow for the use of Seat-style swimming pool lift.

We are happy to supply any further material required by the Committee.

Yours faithfully

Bill Wakefield

Bill Wakefield
Director

Angela Wakefield

Angela Wakefield
Director

Appendix A

Table E3.6 (b) Application of features to passenger lifts

Box	Feature	Application	Box
1	Handrail complying with the provisions for a mandatory handrail in AS1735.12 5.3	All lifts except: (a) a stairway platform lift complying with AS1735.7; (b) a low-rise platform lift complying with AS 1735.14 Remove (b)	1
2	Lift floor dimension of not less than 1400mm x 1600mm	All lifts which travel more than 12m	2
3	Lift floor dimension of not less than 1100mm x 1400mm	All lifts which travel not more than 12m except a stairway platform lift complying with AS 1735.7	3
4	Lift floor dimensions of not less than 810mm x 1200mm	A stairway platform lift complying with AS 1735.7	4
5	Minimum clear door opening complying with AS 1735.12	All lifts except a stairway platform lift complying with AS 1735.7	5
6	Passenger protection system complying with AS 1735.12	All lifts with a power operated door	6
7	Lift landing doors at the upper landing	All lifts except a stairway platform lift complying with AS 1735.7	7
8	Lift car and landing control buttons complying with AS 1735.12 including: (a) 2 stations- one each side 7.2 (b) braille and tactile buttons Add (a) and (b)	All lifts except: (a) a stairway platform lift complying with AS 1735.7; (b) a low-rise platform lift complying with AS 1735.14 Remove (b)	8
9	Lighting in accordance with AS 1735.12	All enclosed lift cars	9
10	(a) Automatic audible information within the lift car to identify the level each time the car stops; and (b) audible and visual indication at each lift landing to indicate the arrival of the lift car; and (c) audible information and audible indication <i>required</i> by (a) and (b) is to be provided in a range of between 20-80 dbA at a maximum frequency of 1500Hz	All lifts serving more than 2 levels	10
11	Emergency hands-free communications, including a button that alerts a call centre of a problem and a light to signal that the call has been received	All lifts except a stairway platform lift complying with AS 1735.7	11

APPENDIX B

RANGE OF SEAT - STYLE SWIMMING POOL LIFTS

