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Australian
Institute of
Architects

Disability (Access
to Premises –
Buildings)
Standards 2009

Submission to
House Standing
Committee on Legal and
Constitutional Affairs

April 2009

SUBMISSION BY

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PURPOSE

- This submission is made by the Australian Institute of Architects (the Institute) to the House of Representatives Standing Committee on Legal and Constitutional Affairs in response to the Disability (Access to Premises – Buildings) Standards 2009.
- This submission has been prepared with the assistance of the Institute's National Access Working Group.
- At the time of this submission the Executive of the Institute is: Howard Tanner (National President), Melinda Dodson (President-Elect), Alec Tzannes (Immediate Past President), Shelley Penn and Rod Mollett.
- The Chief Executive Officer is David Parken.

INFORMATION

Who is making this submission?

- The Institute of Architects is an independent, national, member based organisation with approximately 10,000 members across Australia and overseas. The Institute exists to: advance the interests of members, their professional standards and contemporary practice; and expand and advocate the value of architects and architecture to the sustainable growth of our community, economy and culture. The Institute actively works to maintain and improve the quality of our built environment by promoting better, responsible and environmental design.

Introduction

The Australian Institute of Architects (the Institute) welcomes the opportunity to comment on the Government's draft Disability (Access to Premises – Buildings) Standards 2009 [Premises Standards].

The Institute believes that ensuring a high level of accessibility within the built environment for people of all abilities must be a matter of priority for governments and the community as a whole. A significant proportion of the population will experience a period of disability, whether permanent or temporary, at some stage of their lives. Physical and non-physical barriers within the built environment can have a substantial impact on freedom of movement and therefore freedom of choice especially for people with disabilities, limited mobility or older people.

The architectural profession plays a significant role in the design, documentation and construction of the built environment, and therefore we seek clarity in the standards that govern accessibility in buildings.

Existing rights of access to public facilities and buildings are governed by the combined effect of the prohibition on discrimination contained in the *Disability Discrimination Act* [DDA] together with the provisions of the applicable State or Territory Equal Opportunity legislation and the technical requirements contained in the Building Code of Australia [BCA].

The Institute believes the Premises Standards serve a dual purpose by both codifying the requirements of the DDA and providing more certainty to the building sector about its responsibilities in providing accessible buildings.

Recognising that the Premises Standards have been developed over a significant period of time, the Institute submits that the Premises Standards must be enacted as soon as possible and any issues arising from the Committee's inquiry must be referred to appropriate organisations for prompt resolution but without delaying the passage of the Standards. For instance, we note that the Premises Standards omits issues such as egress and evacuation from high buildings and wayfinding provisions for people with a vision impairment and we submit that these issues could be considered separately from the passage of the Standards. Any substantial unresolved issues should be held over to be addressed, in the worst case, as part of the five year review of the Standards.

The Institute also submits that it is essential for an appropriate mechanism to be provided in the Premises Standard to ensure that both the BCA and relevant Australian Standards are not held static in the event that either the Australian Building Codes Board or Standards Australia identify a need to make significant changes after implementation.

Comments on the Premises Standards

Regulatory Impact Statement

The Institute accepts that the Standards, as identified in the Regulatory Impact Statement [RIS] may involve substantial additional costs for building owners and developers. However we appreciate that almost all important social change involves costs to at least some sections of the community and note that:

- The RIS also points to substantial intangible and unquantifiable benefits arising from the requirements of the Premises Standards,
- As the RIS states, it is arguable that while the Standards amend relevant sections of the BCA, they do not create any new compliance obligations that do not already exist under the DDA's general duties provision,
- Many building owners, developers and architects have substantially adopted measures proposed in the Premises Standards over the last five or more years, so that some of the potential additional costs have already been factored in to current building practice, and
- The scope of 'concessions' under the Standards, in order to minimise the cost to owners of smaller and existing buildings, represents a significant degree of compromise in the 'pure' codification of the DDA, underlining that the balance of cost and benefit of the Premises Standards is appropriate.

Australian Standard 1428.1 2001

The Premises Standards refer to AS1428.1 2001 which has a minimum 1000mm – wide accessway, based on research conducted in the 1980s. This has been clearly indicated as applicable for the 80th percentile wheelchair size (A80 wheelchair) and discriminates against a significant number of people. The premise of the *Disability Discrimination Act* 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.

Class 2 buildings

The Institute notes that the Premises Standard differs from the draft released for consultation in 2004 in that the 2009 Standard does not include access requirements for Class 2 buildings, (apartments and blocks of flats). Increasingly, units within Class 2 buildings are being offered on a short term basis for use such as holiday lets or serviced apartments. In essence, regardless of their purpose when constructed, they are commonly offering accommodation similar to hotels/motels which are required to provide common area access.

The Institute supports the notion of the Australian Building Code Board examining the issue of classification of Class 2 buildings where they are being used primarily as short term serviced apartments without being obliged to implement accessibility measures.

Issues for clarification

The following comments refer to individual clauses where the wording appears unclear or ambiguous in its meaning and therefore could lead to unintended consequences or uncertainty.

Part 2 Scope of Standard

Clause 2.1(5)(b)(ii)

It is unclear whether the reference to 'entrance' in this clause is intended to refer to the 'principal' entrance

Schedule 1 Access Code for Buildings

Part D

Clause DP1(a) (ii)

It appears that access to ancillary rooms such as staff rooms, tea rooms etc are inconsistently excluded from this clause.

Part D3

Clause D3.3(b)

This clause relates to parts of buildings to be accessible. It appears that the clause exempts fire isolated ramps and fire isolated stairs from compliance with the Standards. Exemption of fire isolated stairs and ramps fails to recognise that these may be commonly used for general access and should therefore meet accessibility requirements under this clause. Only fire isolated stairs and ramps that are designated and required *solely* for emergency egress should be exempted from the Standards.

Clause D3.3(d)(i)

This clause relates to access ways and in particular specifies that access ways must have passing spaces complying with AS 1428.1 at maximum 20m intervals on those parts of an access way where a direct line of sight is not available.

Requiring passing spaces at a maximum of 20metre intervals may be unduly onerous potentially requiring a wheelchair user to reverse significant distances which can be extraordinarily difficult. Therefore we suggest shorter maximum intervals be considered.

Clause D3.8 (a) and (d)

This clause relates to the provision of tactile ground surface indicators to buildings required to be accessible. The clause appears to exempt fire isolated stairways and as stated above, it is our submission that only fire isolated stairs and ramps that are designated and required *solely* for emergency egress should be exempted from the Standards.

In addition, where concessions or exemptions have been given in relation to certain buildings or parts of buildings so that they are not required to provide for wheelchair access, the Institute submits that less onerous and low-cost accessible features (such as tactile ground surface indicators, compliant handrails on stairways in small buildings etc) should still be required.

Clause D3.9(iii)

This clause relates to wheelchair seating spaces in Class 9b assembly buildings. It is not clear why the requirement for wheelchair seating locations to be representative of the range of seating should be limited to cinemas.

Clause D4.3 (11)

This clause relates to braille and tactile sign specification and in particular states that tactile text must be Arial typeface. The Institute submits that it is unnecessarily restrictive and inflexible to be so specific. The requirement should be that the font is 'a sans serif style such as Arial'.

Clause D5.2(a) Clause D5.3(a), Clause D5.5(c) and (d)(iii)

These clauses relate to swimming pool access and refer to slip-resistant surfaces. The Institute submits that an appropriate definition or reference to an applicable standard for slip resistant surfaces would make this requirement more robust.

Part F2 Table F2.4(a) Class 1b

This section refers to accessible unisex sanitary compartments in class 1b buildings such as boarding houses, guest houses, hostels etc. It appears to suggest that a person who requires accessible sanitary facilities will need to enter someone's bedroom if that is where the accessible unisex sanitary facility is provided. This would appear to be an inadequate situation particularly if public or communal sanitary facilities are available to all other persons.

Part F2 Table F2.4(a) Class 5,6,7,8,9

The provision of one accessible unisex sanitary compartment on each storey does not seem adequate where a storey has a large floor area eg, shopping centres, warehouses etc. It is suggested that the approach of other international regulations to address this through establishing maximum distances between accessible sanitary facilities on the same floor, should be considered.

Table F2.4 (b) Class 1b

This section refers to accessible unisex showers in class 1b buildings such as boarding houses, guest houses, hostels etc. It appears to suggest that a person who requires an accessible shower will need to enter someone's bedroom if that is where the accessible unisex sanitary facility is provided. This would appear to be an inadequate situation particularly if public or communal shower facilities are available to all other persons.

Appendix

In the following tables, the Institute's National Access Working Group has provided commentary and suggested amendments, for consideration, to the three draft Australian Standards relating to; new building work, tactile indicators and off street parking for people with a disability.

Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
EXHIBIT 9 Draft Australian Standard General requirements for access – new building work		
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 <i>AS/NZS HB197 An introductory guide to the slip resistance of pedestrian surface materials.</i>

Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
4 Definitions	4.5 Continuous accessible path of travel	<p>Heading and content must be consistent with Exhibit 10, Definition 1.4.4.</p> <p><u>Proposed amendment</u></p> <p>Add</p> <p><i>"4.5 Continuous accessible path of travel (accessway)"</i></p> <p>Add</p> <p>A path of travel required to be accessible shall not include a step, stairway, turnstile, revolving door, escalator, moving walkway or other impediment.</p>
4 Definitions	4.14.1 Kerb ramp 4.14.2 Step ramp	<p>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.</p> <p><u>Proposed amendment</u></p> <p>Change</p> <p><i>"4.14.2 Step ramp</i> <i>An inclined surface and a gradient not steeper than 1:8."</i></p>
4 Definitions	4.16 Slip resistant	<p>The stated definition describes slip resistance. A definition used in Australian Standard should be included.</p>
4 Definitions	4.18 Tactile ground surface indicator (TGSi)	<p>Definition used in this document (Exhibit 9) must be consistent with Definition 1.4.22, Exhibit 10.</p>
5 Dimensions	Paragraph 1	<p><u>Proposed amendment</u></p> <p>Add</p> <p><i>"..... All dimensions are net and by projecting skirtings, architraves, window sills, kerbs, handrails or other fixtures."</i></p>
6 Luminance Contrast		<p>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.</p> <p><u>Proposed amendment</u></p> <p>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.</p> <p>Add the following to address walls and floors:</p> <p>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.</p>

Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
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 fittings skirtings, architraves, window sills, kerbs, handrails and the like."</i>
7 Continuous accessible paths of travel	Figure 2	<u>Proposed amendment</u> Delete "1980 mm" unless it is further defined.
7 Continuous accessible paths of travel	Figure 3	<u>Proposed amendment</u> Delete: 1000mm Add: 1200mm
7 Continuous accessible paths of travel	Clause 7.5 Circulation space for 90 degree or less wheelchair turn	<u>Proposed amendment</u> Change heading to Turning space. 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°.
8 Floor or ground surfaces on continuous accessible paths of travel and circulation spaces	Clause 8.4.1 (a)	Text of this Clause should be consistent with Figure 7. <u>Proposed amendment</u> Add <i>"(a) the pile height shall be not more than 6mm and the base height shall not be more than 4mm "</i> 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. <u>Proposed amendment</u> Add (d) underlay shall not be used.

Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
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>
9 Signage	Final "Note"	<p>This note refers to the current BCA Specification D3.6.</p> <p>In Exhibit 1 (Access Code) this was changed to Part D4. Ensure cross-reference is correct.</p>
9 Signage	Figure 8 (d)	<p>Signage indicating handing (RH or LH) of sanitary compartment for people with ambulant disabilities is unnecessary.</p> <p>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.</p> <p><u>Proposed amendment</u></p> <p>Delete handing signage (RH or LH).</p>
10 Tactile Ground Surface Indicators		Refer to comments on Exhibit 10.
11 Walkways, Ramps and Landings	General	<p>Review provision of different gradients for step ramps, kerb ramps and threshold ramps to standardise both gradients and landings.</p> <p>"Ramps" should be defined as common ramp.</p> <p>"Landings" should be defined as elements separate from ramps and walkways.</p>
11 Walkways, Ramps and Landings	Clause 11.1 (d)	<p>Bitumen can be rough or smooth and when smooth is worse than concrete. This provision on bitumen surface also creates confusion.</p> <p><u>Proposed amendment</u></p> <p>Delete all reference to bitumen surface.</p>

Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
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.
11 Walkways, Ramps and Landings	Clause 11.7 Step ramps Clause 11.7.1 (a), (b), and (c) Figures 22a, 22b	There is no logical reason for a step ramp to be different from a kerb ramp in terms of its design criteria and limitations. 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). <u>Proposed amendment</u> Change general requirements stated in text and figures to be consistent with kerb ramps in all details.
11 Walkways, Ramps and Landings	Clause 11.7 Step ramps Paragraph 3	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. <u>Proposed amendment</u> Add "The edges of step ramp shall have a 30°- 45° splay wherecross traffic."
11 Walkways, Ramps and Landings	Figure 23 Clause 11.8.2 (ii)	As illustrated in Figure 23 it is not always possible to achieve a 45° splay in corner locations. Text should match diagrams/illustrations. <u>Proposed amendment</u> Change "(ii) The edges of a kerb ramp shall be tapered or splayed at 30°- 45°."
11 Walkways, Ramps and Landings	Figure 24(a) Figure 24(b)	Top and bottom landings must be 1500mm long. <u>Proposed amendment</u> Change Amend Plan View to indicate 1500mm bottom landing consistent with Section A-A.

Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
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)] “900mm - 1100mm min” from nosing to boundary.</p>
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 <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 <i>“strip of contrasting colour 25 to 50”.</i></p> <p>Delete contrast strip on the riser.</p>
12 Stairways	Clause 12.2(g)	<p><u>Proposed amendment</u></p> <p>Add <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 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>

Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
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. <u>Proposed amendment</u> Amend <i>"The height of with Item (d), shall any landings."</i></p>
14 Doorways, Doors and Circulation Space at Doorways	Clause 14.1 Paragraph 1	<p>Define "high luminance contrast". <u>Proposed amendment</u> Change <i>"Doors forming part shall have not less than 30% luminance contrast"</i></p>
14 Doorways, Doors and Circulation Space at Doorways	Clause 14.1	<p><u>Proposed amendment</u> Add (e) door jamb and adjacent wall.</p>
14 Doorways, Doors and Circulation Space at Doorways	Clause 14.2 Visual indicators at glazed doors and sidelights	<p>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).</p>

Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
14 Doorways, Doors and Circulation Space at Doorways	Clause 14.4.3 Sliding doors	<p>This section requires an introduction which applies to all sliding doors.</p> <p><u>Proposed amendment</u></p> <p>Add</p> <p>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.</p> <p>Where a sliding door is powered, and the approach is from the front, circulation space at WL is not required. [See Figure 31(d)]</p>
14 Doorways, Doors and Circulation Space at Doorways	Clause 14.4.3.1 Cavity sliding doors	<p><u>Proposed amendment</u></p> <p>Amend</p> <p>"Where in Figure 31 for width (D)."</p> <p>Delete "WH"</p> <p>"Where a sliding door is automatic, for a front approach the WL dimension does not apply."</p>
14 Doorways, Doors and Circulation Space at Doorways	Figure 32 Door approach	<p>There appears to be reference errors.</p> <p><u>Proposed amendment</u></p> <p>Amend</p> <p>Line 1: "Figure 31(d)"</p> <p>Line 2: "Figure 31(a), (b), (c)"</p>
14 Doorways, Doors and Circulation Space at Doorways	Clause 14.4.4 Automatic doors	<p><u>Proposed amendment</u></p> <p>Change "automatic doors" to powered doors.</p> <p>Add</p> <p>Where a sliding door is powered, and the approach is from the front, circulation space at WL is not required. [See Figure 31(d)]</p> <p>Amend</p> <p>"For location of manual controls for powered doors, see Clause 14.6.3."</p>
14 Doorways, Doors and Circulation Space at Doorways	Figure 34(c)	<p><u>Proposed amendment</u></p> <p>Amend</p> <p>Show dimension as clear dimension between back of handle and face of door, consistent with Figure 34(b).</p>

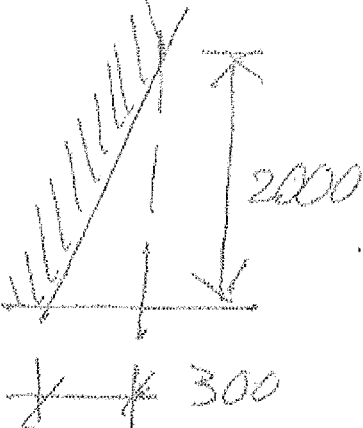
Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
14 Doorways, Doors and Circulation Space at Doorways	Clause 14.6.3 Location (Line 1)	<p><u>Proposed amendment</u></p> <p>Add</p> <p><i>"Except in early childhood centres and swimming pool barriers or similar where</i></p> <p>Note: Example of a "similar" facility is the children's part of a hospital.</p>
16 Sanitary Facilities	Clause 16.2.5(d) Figure 41(a) Figure 41(b)	<p>A review is necessary to eliminate conflicting requirements, such as:</p> <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 <i>"the front of any back-wall-mounted fixture or obstruction"</i> 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.
16 Sanitary Facilities	Clause 16.2.5(d) Figure 41(a) Figure 41(b)	<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.) - <i>"Top of backrest 850 to 860 minimum"</i> (above floor level) - <i>"Lower edge of backrest 650 maximum"</i> (above floor level). - Illustration of backrest and cistern must be clearly separated to avoid confusion. [This applies especially to Figure 41(a).]

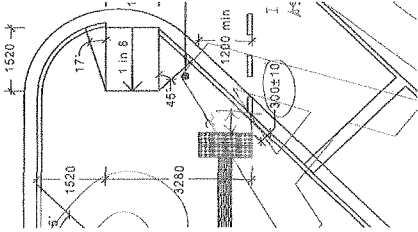
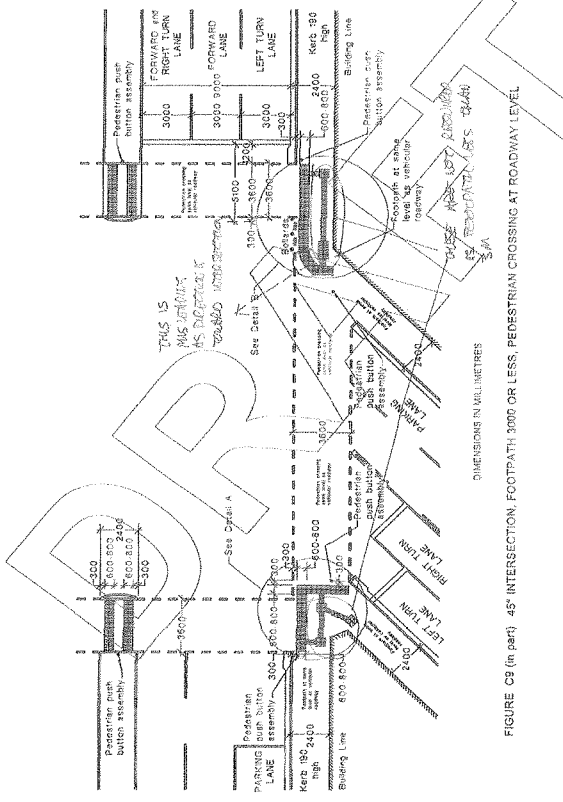
Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
16 Sanitary Facilities	Figure 43	<p>Staff call button is sometimes required. It would be useful to include its position in this diagram.</p> <p><u>Proposed amendment</u></p> <p>Add</p> <p>Staff call button location in line with and before the zone for toilet paper dispenser.</p>
16 Sanitary Facilities	Clause 16.2.10	<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> <p>-----</p> <p>--</p> <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>(d) "Doors The latch mechanism shall be operable from the outside in an emergency but otherwise shall not be operable from the outside. The door mechanism shall enable the user to verify that the door is secure from unintended or unauthorised entry."</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>"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."</p> <p>Add</p> <p>In all sanitary facilities, the mirror shall be located either above or adjacent to the washbasin.</p>

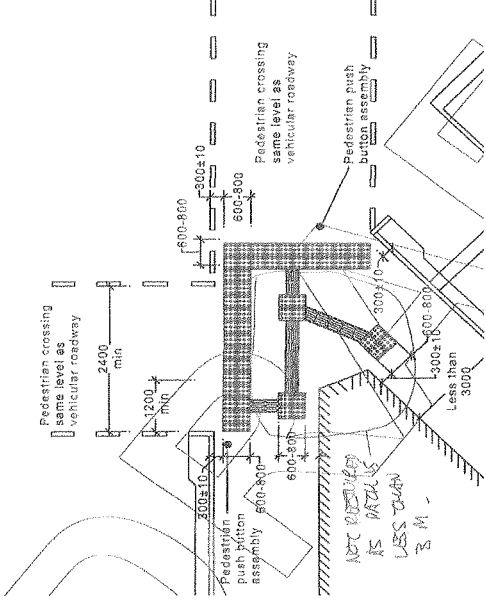
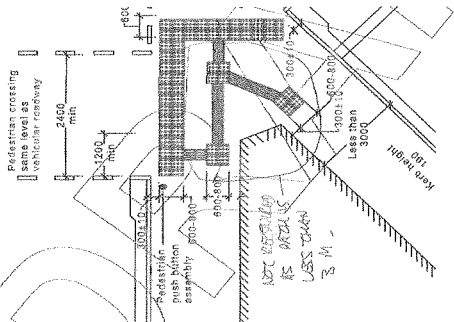
Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
16 Sanitary Facilities	Clause 16.4.3	<p>At least one item of each type must be provided.</p> <p><u>Proposed amendment</u></p> <p>Delete "where provided".</p> <p>Change text</p> <p>"Soap dispensers, paper towel dispensers or hand dryers, and similar fittings shall be installed with be operable by one hand."</p>
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>(b) <i>The waste outlet for the showerwith Figure 49.</i></p> <p>(c) <i>The slope of the floor of the shower recess gradient between 1 in 50 and 1:80 and the floor waste located at 550±25 from 3 sides of the shower recess (see Figure 39 and Figure 49).</i></p> <p>: The floor waste must be.</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>(d) Allow the shower head holder to be pulled down from a seated position by means of a lever or the like.</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" Centreline of wash basin: "425 min."</p> <p>Add</p> <p>Dimensions to locate the coat hooks.</p>

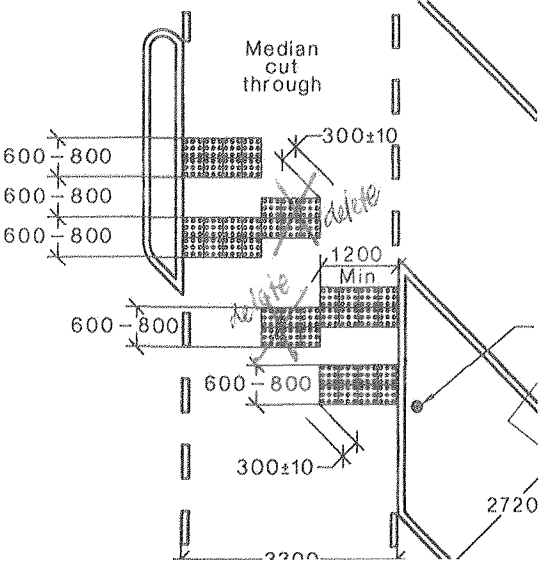
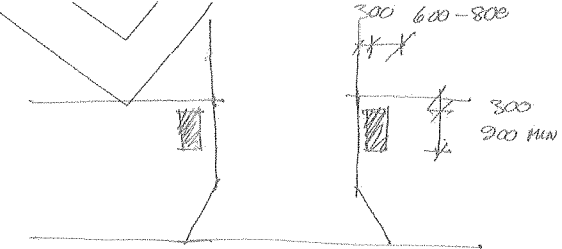
Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
16 Sanitary Facilities	Clause 16.7.5	<p>The coat hook(s) must be accessible from a seated position.</p> <p><u>Proposed amendment</u></p> <p>Delete existing text.</p> <p>Add</p> <p>Coat hook(s) shall be installed between 1200mm and 1350mm 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 Draft Australian Standard Design for Access and mobility – tactile indicators		
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)	<p>This layout is applicable to the main floor of most stairs.</p> <p>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.</p> <p>However, this would only apply where the distance from edge of last riser to doorway (marked as "X" in diagram below) is short.</p> <p>This provision could be misleading if the distance allows the person to walk fast.</p> <div data-bbox="821 1075 1348 1601" data-label="Diagram"> <p>(a) Plan of installation at a stairway</p> </div> <p><u>Proposed amendment</u></p> <p>Add</p> <p>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.</p>
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>

Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
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 11	<p>It would be useful to include a layout for a bus stop located at the T-junction of footpaths, where one footpath continues at the kerbside.</p>
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(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>

Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
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>  <p>Proposed amendment</p> <p>Amend</p> <p>Indicate 300mm dimension from warning TGSIs to the kerb in the direction of travel.</p>
Appendix C	Figure C9 (page 51)	<p>Directional tiles are not required as footpath is less than 3m wide.</p> <p>Detail B is misleading as direction is toward the intersection.</p>  <p>FIGURE C9 (in part) 45° INTERSECTION, FOOTPATH 3000 OR LESS, PEDESTRIAN CROSSING AT ROADWAY LEVEL</p> <p>DIMENSIONS IN MILLIMETRES</p> <p>DR 04020--4944-PDR.doc - 12/01/2004 16:24:05</p>

Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
Appendix C	Figure C9 (page 51) Detail B	<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> 
Appendix C	Figure C9 (page 51) Detail A	<p>Refer to comment above on Detail B.</p> 

Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
Appendix C	Figure C10 Median Crossing	<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 below.</p> 
Appendix C	Figure C12	<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> 
Appendix D	Figure D1	<p>It would be useful to include an illustration of a bus stop separated from the kerb by the footpath.</p> <p>Refer also to comment on Figure 11.</p>

Document/Part	Clause/Table/Figure	Comments & Proposed Amendments
EXHIBIT 11 Draft Australian Standard Parking Facilities – Off-street parking for people with disabilities		
Section 2	Clause 2.2.1(e)	<p>The bollard should be easily seen by pedestrians with low vision and drivers.</p> <p><u>Proposed amendment</u></p> <p>Add</p> <p>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.</p>
Section 2	Figure 2.3	<p>Figure 2.3 must be consistent with Figure 2.2.</p> <p><u>Proposed amendment</u></p> <p>Add</p> <p>5400 to indicate length of parking space</p>
Section 2	Clause 2.3	<p>Drivers may drive forward or reverse into the dedicated parking space. Therefore the whole dedicated parking space must be clear of any obstruction.</p> <p><u>Proposed amendment</u></p> <p>Add</p> <p>There shall be no wheel stops in parking spaces for people with disabilities.</p> <p><i>Note: This requirement was in Section 6.3 of DR04021-2004 (Draft Parking Standard released in 2004 for public comment).</i></p>
Section 2	Figure 2.5	<p>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.</p> <p><u>Proposed amendment</u></p> <p>Amend width of walkway.</p>

<p>Section 2</p>	<p>Figure 2.6 Section A-A</p>	<p>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.</p>
<p>Section 2</p>	<p>Clause 2.4 Paragraph 1</p>	<p>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.</p>
<p>Section ?</p>	<p>New Clause</p>	<p><u>Proposed amendment</u> Add requirements relevant to boom gates, accessible ticket machines, and accessible pay station machines.</p>