



26 February 2009

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



email: [laca.reps@aph.gov.au](mailto:laca.reps@aph.gov.au)

### **Submission to Parliamentary Committee: New Parliamentary Inquiry on Disability Access Standards**

We note the Terms of Reference contained in Press Release of 12 December 2008 and offer the following comments on the Draft Disability (Access to Premises - Buildings) Standards.

#### **1.0 GENERAL COMMENTS:**

- 1.1 The Access to Premise lacks reference to some critical issues which means that it remains as an incomplete DDA standard and lacking in certainty for all. The main issues are:
  - o Lack of adequate reference to or incorporation of wayfinding issues
  - o Lack of consideration of egress and any possible solutions, such as safe havens.
- 1.2 There is also a lack of inclusion of Class 2 buildings, which will open up potential for discrimination claims. Many Councils already define accessibility and adaptability requirements which have been accepted by the industry so these could have been included to ensure consistency and less discrimination.
- 1.3 The current standard refers to AS1428.1 2001 which has a minimum accessway of 1000mm. This has been clearly indicated as applicable for A80 wheelchairs and discriminates against a number of people. The premise of the DDA is to reduce discrimination and the A90 is considered the minimum or 1200mm wide path of travel.

This requirement has been widely accepted by the industry, both public and private, since 2004, and is a fundamental requirement for a disability standard.

The other issue is that increased obesity is a fact of life and this has driven the need for larger wheelchairs. Without an increase in the width of path of travel it is effectively reducing the accessibility for a greater number of people.

#### **2.0 DETAILED COMMENTS**

The following are detailed comments. There are some questions raised when items are considered unclear. Rewording may not be suggested in all cases, but the issue to be clarified is identified.

Document/Part	Clause	Comment
<b>Disability (Access to Premises – Buildings) Standards 2009</b>		
		<b>General:</b> If BCA is amended by changing a clause similar to Schedule 1, does the Act have to be amended to make it enforceable? If so this would be a most cumbersome process.
<b>Part 1 Preliminary</b>		No comment
<b>Part 2 Scope of Standard</b>	2.2	This clause is qualified “to the extent that they are responsible for, or have control over, matters in the Access Code for a relevant building”. This is a most unusual clause and qualification and likely to create a real difficulty in implementation. If the owner accepts an architect’s drawings, do they then have responsibility for and have control over the building for matters in the Access Code? I suggest that the qualification should be removed totally, and it is the responsibility of all to comply. This is the intent of the DDA.
	3 (a)	Wording is unclear. Should “existing” be added before building in (a)?
	4 (a) “competent authority”	Approval for internal works is by a certifier. Is the “competent authority” then the certifier?
	5(b)(ii) “... accessible path of travel from <u>the</u> entrance...”	Can this be any entrance or is it the Principal Pedestrian Entrance or any accessible entrance? I suggest we add “principal public” before entrance.
<b>Part 3 Requirements of Standards</b>	3.1 (3) Targets (2) (a) - 25%	Does this mean 25% of items a) – j) or 25% of total building?
	3.1 (3) (4)	Does this mean 55% of items a) – j) or 25% of total building?
<b>Part 4 Exceptions and Concessions</b>	4.1 (3) (f)	Is “heritage” a technical factor?
	4.1 (3) (k)	How do you resolve this if the heritage value is sufficient to enable non-compliance? This only says it is a factor to consider (refer separate submission).
	4.1 (4) (a) “...access to <u>public</u> premises...”	Why only ‘public’? The standard applies to a wider range of buildings.
	4.3	This can be with the owner’s consent.
	4.3 (1) (b) The Building Certifier	For internal work, this is the approving authority. Who then ensures compliance?
	4.4	Accepts something less than objective of A90 which was considered the DDA level.
	4.5	Accepts something less than objective of A90 which was considered the DDA level.
<b>Part 5 Review</b>	5.1 (1) (a)	Is 5 years too short? It took more than 5 years to consider this one (from 2004)

<b>Schedule 1 Part A3 Access code – documents adopted by Referee</b>	AS 1428 Part 4 1992	This will need amendment to the revised standard.
	AS1735.12	200X? May need amendment to meet these new requirements.
<b>Schedule 1 Part D Access and Egress</b>	DP1	Add "areas normally used by occupants" as this could exclude a tearoom.
	DP4	How do you cater for PWD on upper levels? Performance requirements should include them otherwise discrimination remains.
	DP8 Limitation (b)	What does this clause mean? Car parks are accessible by the public or occupants.
	DP9	This should also include vision impaired and appropriate provisions for them such as message systems, AV's and TV's in schools; airports, ferry terminals, bus stops, etc.
<b>Schedule 1 Part D3 Access for people with a disability</b>	Table D3.1 Class 1b (b) Access Requirements Para 3	Does this mean provide a step and you do not need to provide access to more than 1 room and common facilities? It is interesting to note that in (a) 0-3 dwelling requires no accessible units but in (b) an accessible unit is required regardless. These should be consistent and if the intent of the DDA is to be achieved (a) should be amended to require at least one accessible dwelling.
	Table D3.1 Class 1b Common Areas Access Requirements	This only requires one SOU floor to be accessible which retains discrimination.
	Table D3.1 Class 9b Common Areas	It is critical that wheel chair spaces are dispersed and this needs to be made clear.
	Table D3.1 Class 9c Common Areas Para 1	This only requires one SOU floor to be accessible which retains discrimination.
	Table D3.1 Class 9c Common Areas Para 3	Does this mean provide a step and you do not need to provide access to more than 1 room and common facilities?
<b>Schedule 1 Part D3.2 Access to buildings</b>	(2) (b)	This does not require entrances every 50m, which it should.
<b>Schedule 1 Part D3.4 Parts of buildings to be accessible</b>	(b) (ii)	What of general use fire stairs which should not be excluded?
<b>Schedule 1 Part D3.3 Exemptions</b>	(c) – (f)	What of OH&S issues and other hazardous areas eg wood working equipment, sensitive laboratories? This is especially inappropriate for a class 6 which could be a café or public facility which should not be granted this exemption.
	(f) (ii)	Retains a level of discrimination which should not be accepted under DDA.
<b>Schedule 1 Part D3.7 Hearing augmentation</b>	(4)	Must be audible/visual.
<b>Schedule 1 Part D3.8 Tactile Indicators</b>	(1) (a) and (d)	Why not a fire stair, if a general access stair as well?

	(1) (e) (ii) "a vehicular way adjacent to any pedestrian entrance..."	How far away need it be to be adjacent? Delete adjacent.
	(3)	Does this mean grab rails on both sides of access way which is in AS1428.1?
<b>Schedule 1 Part D3.9</b>	(iii)	Open to interpretation as the range can vary greatly
<b>Schedule 1 Part D3.10 Swimming Pools</b>	(2) (a)	Moveable ramp is not independent/ dignified.
	(2) (c)	Must be safely use by PWD independently and all ages.
<b>Schedule 1 Part D5.2 Fixed or moveable ramp</b>	(a)	Need to specify level of resistance or reference a standard.
<b>Schedule 1 Part D5.3 Zero depth entry</b>	(a)	Need to specify level of resistance or reference a standard.
<b>Schedule 1 Part D5.5 sling-style swimming pool lift</b>	(c) and (d) (iii)	Need to specify level of resistance or reference a standard.
<b>Schedule 1 Part F2 Sanitary and other facilities</b>		<b>General comment:</b> Should call bells be specified? They provide a useful assistance.
		The current BCA Clause F2.5 <i>Construction of Sanitary Compartments</i> permits doors to swing inward if there is a "clear space of at least 1.2m between the closest pan... and the nearest part of the doorway". 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 "doorway" is inappropriate and should be "door swing" if it is to be effective and meet the performance requirements.
<b>Schedule 1 Part H2 Public transport building</b>	(6)	<b>General Comment:</b> All references to AS1428.2 should be replaced, as it will no longer exist.
<b>Disability Standard for Accessible Public Transport Amendment 2009</b>		
		No Comment
<b>Disability (Access to Premises – Buildings) Standards Guidelines 2009</b>		
<b>Part 2.3 What buildings do the Premises Standards apply to?</b>	(4)	Discrimination remains in the areas not covered in the BCA which is unfortunate.
<b>Part 3 Relationship to the Building Code of Australia</b>	(4)	How to manage amendments to BCA that are incorporated in later years without amending the Act every year. This needs resolution or the Act will be out of date or compliance will be to an out of date Act.
<b>Part 4.1 Building access matters not dealt with by the Premises Standards</b>	(1)	Tearooms are also not dealt with, but should be.

<b>Part 4.6 Innovation beyond the Premises Standards</b>	(2) "... While the Premises Standards will only require compliance in the specific editions of the Australian Standards referenced in the Access Code..."	This is inadequate if standards are amended
	(2) "...if it would satisfy the Performance Requirements of the Access Code."	Why make it confusing and convoluted? There must be a way of referring to the current standard otherwise as refinements occur to correct problems compliance is to an incorrect detail.
<b>Part 5.1 Unjustifiable Hardship</b>	(4)	Yet it may be to an outdated standard.
<b>Part 5.3 Lessees</b>	(3)	This is messy and retains discrimination. Or will discrimination not exist as compliance is exempt under this clause?
<b>Part 6, 1.3 Updated Australian Standards</b>	(1)	This needs to be current version of standard
<b>Access Code for Buildings Part A General Provisions</b>	Class 1 buildings (3)	Why not? It should if discrimination is to be removed.
<b>Access Code for Buildings, Clause D3.8 Tactile Indicators</b>	(3)	Provided a handrail is continuous.
<b>A Model Process to Administer Building Access for People with a Disability. 'The Protocol' 2009</b>		
Article 7	Clause 2	This could be interpreted as the administration, requiring the Panel member to have their own insurance and indemnity which could have implications under Part 3 of the Act.
<b>Regulation Impact Statement</b>		
		It is based on incorrect assumptions, especially as much of the industry has been using the 2004 draft proposal for a number of years. The figures are then misleading.
<b>Proposed BCA Amendments Associated Building Cost Matrix - Upgrade</b>		
		No comment.
<b>Proposed BCA Amendments Associated Building Cost Matrix - New</b>		
		No comment.
<b>Summary of main Australian Standards referenced in the Access Code.</b>		
		<b>General Comment:</b> Separate comments are made on the standards.
<b>Specifications for continuous accessible paths of travel</b>	Para 1 "...1200mm..."	1200 refer to in DSAPT and parts of proposed Schedule 1.

	Point 1 " <u>...on an accessway...</u> "	"Accessway" is not defined in AS1428.1. Should be "continuous path of travel".
<b>Walkways ramps (including kerb and step ramps) and landings</b>	Comment "...1.8 ..."	This is a messy mix and the one design should apply to both kerb ramps and step ramps.

Yours faithfully

Eric Martin  
Director  
Registered Architect  
ACT376 VIC5150 NSW5991  
WA1663 QLD3391



The Beehive Group Pty Ltd (Trustee) T/A  
**Eric Martin & Associates**

ARCHITECTS

Ph 02 6260 6395

PO Box 4699 KINGSTON ACT 2604

Suite 10, 68 Jardine Street KINGSTON ACT 2604 AUSTRALIA

ABN: 317 906 87011

Fax 02 6260 6413

Email: [ema@ema.com.au](mailto:ema@ema.com.au)

Eric Martin ACT Architect Reg No 376

26 February 2009

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

RECEIVED SM  
27 FEB 2009  
BY: LACA

email: [laca.reps@aph.gov.au](mailto:laca.reps@aph.gov.au)

**Submission to Parliamentary Committee:  
New Parliamentary Inquiry on Disability Access Standards  
ISSUES RELATED TO HERITAGE BUILDINGS**

We note the Terms of Reference contained in Press Release of 12 December 2008 and offer the following comments on the Draft Disability (Access to Premises - Buildings) Standards.

We commend the introduction of Heritage into the documents and offer the following comments on the draft proposals. However, the process of resolving disability access and heritage is clearly an adversarial approach as it relies on a determination of unjustifiable hardship which is for the courts to determine. There is a better way for a better outcome such as a performance based solution. However for this to be effective, better information in the guidelines is essential. We would also encourage States/Territories to adopt The Protocol, provide access to an expert panel for advice or encourage a conciliation process to resolve difficult issues.

**1.0 DISABILITY (ACCESS TO PREMISES – BUILDINGS) STANDARDS  
2009**

Specific references to heritage buildings are contained in *Part 4 Clause 4.1 Unjustifiable Hardship*:

- “(3) *In determining whether compliance with a requirement of these Standards would involve unjustifiable hardship, all relevant circumstances of the particular case are to be taken into account including the following:*
- (j) *detriment reasonably likely to be suffered by a building developer, building certifier<sup>4</sup> or building manager, or a person with a disability or other building user, including in relation to means of access, comfort and convenience if compliance with these Standards is required;*
  - (k) *if detriment under paragraph (j) involves loss of heritage values – the extent to which relevant heritage value or features of the building are essential, and to what extent incidental, to the building.”*

## 2.0 DISABILITY (ACCESS TO PREMISES – BUILDINGS) STANDARDS GUIDELINE 2009

It is worth noting Part 5 Exceptions and Concessions, in particular,

### “5.1 Unjustifiable Hardship

(3) *There is, however, no mechanism in the DDA or the Premises Standards for anyone to give prior approval for non-compliance with any part of the Premises Standards on the grounds of unjustifiable hardship. Decisions about unjustifiable hardship can only be made by a court following an actual complaint.*

And

“(8) *Where a person responsible for a building does not provide full and equitable access in an existing building (including heritage buildings) because they believe this would involve unjustifiable hardship, providing no access at all would not be appropriate. For example, while enlarging a lift shaft may not be possible, improving access by upgrading lift controls and providing announcements in lifts may be possible. While it may be too difficult to provide access to a small heritage listed building through the front door, it may be possible to design easier access for all visitors through a rear or side door.*”

## 3.0 A MODEL PROCESS TO ADMINISTER BUILDING ACCESS FOR PEOPLE WITH A DISABILITY ‘THE PROTOCOL’ 2008

This establishes an Access Panel to determine acceptable alternate solutions.

Annex 1 to the Protocol for Administering Building Access Guidance Advice Clause 1.4 Unjustifiable Hardship item 3 (j) and (k) includes the same clause as in part 1 above and item 7 includes the same clause as (8) in point 2 above.

## 4.0 APPLICATION

Any proponent must comply with the BCA for new works unless they seek dispensation under unjustifiable hardship under the DDA through the Courts or seek acceptance of an alternative solution through The Protocol or the approving authority.

## 5.0 COMMENT

The statement in (3) (k) (refer point 1 above) is open to interpretation or misinterpretation and needs amendment.

### 5.1 “Heritage Value”

Who attributes this? Is a listing on a National, State/Territory or local statutory list required? Are non-statutory lists such as the National Trust of Australia or Professional Institutions considered acceptable?

### 5.2 “Relevant Heritage value or features of a building”

Relevant to whom? And what is a feature?

### 5.3 “...are essential and to what extent incidental...”

Essential, or incidental to what?

- 5.4 The missing issue here is an understanding of cultural significance which is a fundamental component of all heritage assessments and listings which is set down by established criteria and principles. Significance is attributed to places as a whole and to fabric/components/elements. Levels of significance, and hence their heritage value, can vary.
- 5.5 It would be more appropriate to use definitions embodied with "the Burra Charter" 1999 which is accepted and known nationally as a standard charter for places of cultural significance. Eg definitions of "cultural significance" (Clause 1.2) and "values" (Article 5). Other relevant sections are Article 15: Change; Article 22: New Work and Article 27: Managing Change.
- 5.6 There is a strong role for The Protocol to work in this area for the best outcome, rather than retreat to a formal process to establish unjustifiable hardship.
- 5.7 The guideline point 5.1 (8) (refer point 2 above) suggests that a rear or side door may be acceptable if the front door is not. This appears clearly discriminatory and needs rewording.

## 6. A SUGGESTION

- 6.3 (k) if detriment under paragraph (j) involves
- the potential loss of cultural significance of a heritage listed place
  - potential loss of fabric of high heritage value, and
  - an irreversible impact on the cultural significance.
- 6.2 The guideline document 5.1 (8) needs the last sentence to read "While it may be too difficult to provide access to a small heritage building through an original or existing door, it may be possible to relocate the principle public entrance and design an easier access for all patrons through an alternative entrance."
- 6.3 The Guideline document needs to be expanded beyond just a repeat of the clauses in Access to Premises Standard to explain what is meant by this clause. The explanation could be by reference to:
- Burra Charter
  - Key references that outline details on access to heritage buildings
  - The benefit of The Protocol (or technical panels if The Protocol is not adopted)
  - Heritage Impact Statements.

This information source is essential if the intent of the DDA, which is looking for the best outcome, is to be achieved. We are willing to assist in preparing an expansion of the guidelines as desired.

Yours faithfully

Eric Martin  
 Director  
 Registered Architect  
 ACT376 VIC5150 NSW5991  
 WA1663 QLD3391



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

email: [laca.reps@aph.gov.au](mailto:laca.reps@aph.gov.au)

RECEIVED  
27 FEB 2009

BY: LACA

## STANDARDS AUSTRALIA COMMITTEE ME-064 ACCESS FOR PEOPLE WITH DISABILITIES DESIGN FOR ACCESS AND MOBILITY<sup>1</sup>

We note the Terms of Reference contained in Press Release of 12 December 2008 and offer the following comments.

### 1.0 GENERAL COMMENTS:

#### Part 1: General Requirement for Access – New building work.

##### Minimum Accessway Width:

The current standard refers to AS1428.1 2001 which has a minimum accessway of 1000mm. This has been clearly indicated as applicable for A80 wheelchairs and discriminates against a number of people. The premise of the DDA is to reduce discrimination and the A90 is considered the minimum or 1200mm wide path of travel.

This requirement has been widely accepted by the industry, both public and private, since 2004, and is a fundamental requirement for a disability standard.

The other issue is that increased obesity is a fact of life and this has driven the need for larger wheelchairs. Without an increase in the width of path of travel it is effectively reducing the accessibility for a greater number of people, which is contrary to the DDA.

The 1200 should be adopted and then this implemented throughout all standards under review.

### 2.0 DETAILED COMMENTS

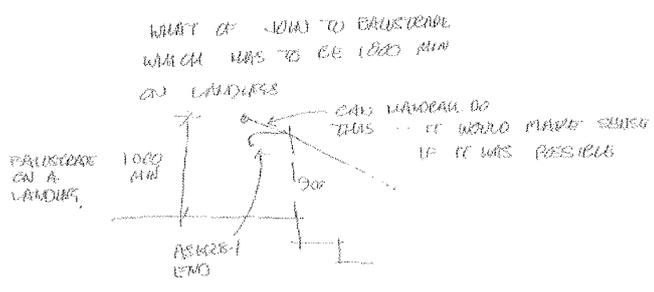
The following are detailed comments. There are some questions raised when items are considered unclear. Rewording may not be suggested in all cases, but the issue to be clarified is identified.

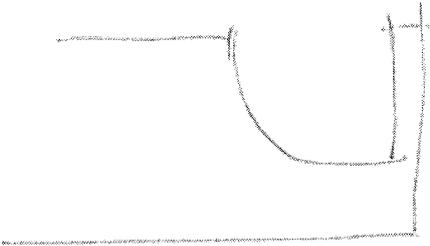
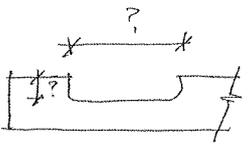
<b>1 Scope</b>	Para 3	Those standards to other features that have disability access requirements need to be referenced in clause 3 Referenced Documents
<b>2 Application</b>	Para 3	If this is so, should this standard be referenced for aged care facilities or at least qualified.
	Para 5	The research referenced is 25 years old and is hardly an appropriate base to work from. Refer also comment below.

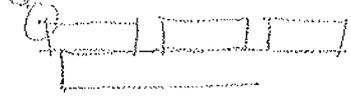
<sup>1</sup> NOTE: Shaded comments are from John Deshon but are fully supported and are added as they are also my comments on the relevant clause.<sup>1</sup>

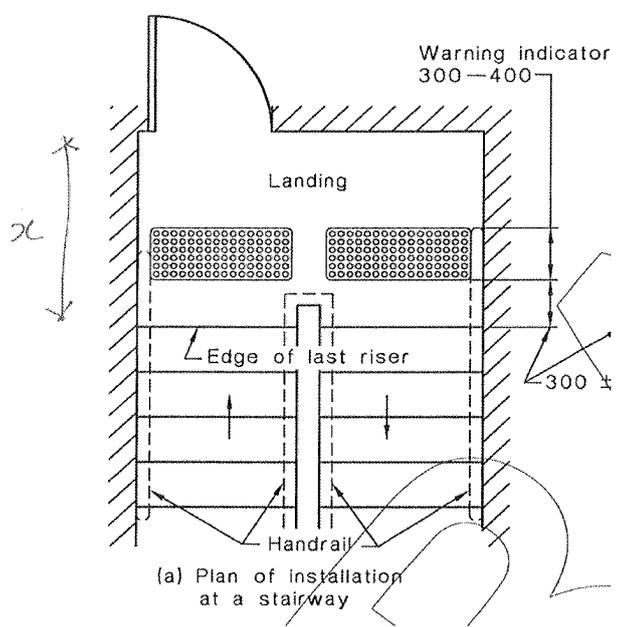
	Para 6	Should have more recent information, eg Hunarch Consulting 2003 Research
<b>3 Referenced Documents</b>		Refer comment on Clause 3 – should have more references.
<b>4. Definitions</b>	4.5 Continuos accessible path of travel	Add (Accessway) as defined in AS1428.4
	4.14.1 Kerb ramp	Step ramp and kerb ramp are effectively the same thing. Why different conditions? If a kerb ramp works then this should apply to both. How do you define something between 1 in 10 and 1 in 12? Or steeper than 1 in 8? It is a ramp but not one within this code
	4.16 Slip resistant	Wrong definition - "slip resistant" is not a force. It is a surface that has a force. This should refer to a measure against an Australian Standard or HB197
	4.17 Sole Occupant	Definition is probably best left to BCA.
	4.18 Tactile ground surface indicator (TGSI)	Add Refer AS 1428.4
	4.20	If considering skirtings, what of architraves and window sills? We consider the face of the wall which has been the accepted standard should continue
<b>5 Dimensions</b>	Para 1 "...projecting skirtings..."	This has not been the interpretation to date. Skirtings do not intrude or restrict access as the knuckle clearance more than compensates.
<b>6 Luminance contrast</b>	Para 1	The current statement doesn't nominate what elements are to contrast, it doesn't nominate what they are to contrast with and it doesn't specify the level of luminance. Re-write the clause to reference particular elements (eg handrails and grabrails, door furniture and switches) noted elsewhere in the text and address walls and floors through the inclusion of the following: <i>"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."</i>
<b>7 Continuous accessible paths of travel</b>	7.3 Width of a continuous accessible path of travel	Width of 1000mm is inconsistent - 1200mm in 2008 DDA, Statement for "accessway" which is not defined here; 1200mm is in Access Code Part H2 Public Transport Buildings. Refer general comment above.
	7.3 (a)	Refer comment above in Section 5 re skirtings.
	Figure 2	It is clear from Figure 1 that skirting or curved floor detail has no impact on spatial requirement.
	Figure 3	Accessway should be minimum of 1200mm. Refer general comment above
	7.5 Circulation space for 90 degree or less wheelchair turn	Rename this section "Turning Space" and edit the text <i>"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°."</i>

	Para 2	Should read 1000mm x 1000mm for consistency
<b>8 Floor or ground surfaces on continuous accessible paths of travel and circulation spaces</b>		
	8.4 Fixed or recessed floor coverings – soft floor coverings 8.4.1 (a)	Note: softness can be due to underlay. A pile height of 6mm with an ultra soft underlay can still be a problem to access.
<b>9 Signage</b>		
	Final Note	References D3.6 – note that this was changed to Part D4 in Access Code for Building
	9.2.1 (c)	Can it be any other colour, eg black on white? These perform equally as well
	9.2.2 (d)	Can it be any other colour, eg black on white? These perform equally as well
<b>10 Tactile Ground Surface Indicators</b>		
Refer to comments on AS1428.4		
<b>11 Walkways, Ramps and Landings</b>		
	11.1 (d) line 4 "...bitumen surfaces.."	Remove reference to bitumen surface. Bitumen can be rough or smooth and when smooth is worse than concrete. It also adds confusion.
	11.2 (a)	Resolve wider paths, ie we believe that 1200mm + 2 x 600 or 2400mm is acceptable without a kerb. This needs to also apply to any access way or landing
	11.2(b)	Edit the clause as follows: "The maximum length of walkways shall be: (i) for a gradient of 1 in 20.....15m (ii) for a gradient of 1 in 33.....25m (iii) for gradients between 1 in 20 and 1 in 33.....as determined by linear interpolation (iv) for gradients less than 1 in 33...no limit
	11.2 (c)	This is virtually never used and just adds another un-necessary option. Delete it.
	11.3 (h)	This is not applicable at floor landings for the inner handrail
	Figure 14	Accessway width should be 1200mm. Refer general comment above.
	Figure 15 & 6	It would be useful to reference TGSI refer AS1428.4
	11.5	I would prefer to distinguish landings from ramps and walkways. This would allow common ramps, kerb ramps, step ramps and threshold ramps to be collected, and then landings for all of them described.
	11.5.2	Treat step and kerb ramps the same. There is no logic to do otherwise.
	11.5.3	Referenced length for step ramp should be 1500mm. Refer fig. 24a
	Figure 21	Define where taper starts at side of opening or edge of circulation space at door as per figure 30 + 600mm as per figure 11.2.
	11.7	Make consistent with kerb ramps in all details
	11.7 (c)	Should be 1:8 to match kerb ramps
	11.7 para 3	Can it be less than 45° as it is not always possible to get 45° as is indicated for kerb ramps.

	Figure 21 (a), (b) and (c)	Max grade should be 1:8 to match kerb ramps
	11.8.2 para 2 (b) "...45°..."	This angle needs greater flexibility eg as is shown as 30° in Figure 23.
	11.8.2 para 2 (b) "...1500mm."	If ramp can be 1520 and 45° is required it needs to be 1520mm wide. In many cases on curve you cannot get 1500mm. The angle needs to be flexible
	Figure 23	Should be 1200mm wide Ramp angle shown in section A-A (166°) is inconsistent with Figure 22 (shown as 174°)
	Figure 24	A path width of 1500mm and 1000mm is shown but it is not consistent with a minimum 1000 (1200 is recommended in my comments) plus 600 as per clause 11.2a
<b>12 Stairways</b>	12.1 (e)	There should be no projection as it is a trip hazard for some people. A tapered riser is acceptable but not a projection.
	12.1 g and Fig 26	Are inserts acceptable and what does "at the nosing" mean? Can there be gaps in contrast band? Eg If the contrast nosing is not continuous then you need to have 45% luminance contrast like individual TGS1? The industry frequently supplies this type.
	12.2 (g)	Does this apply to landings at floor levels? Surely the same principle applies? There is also a need to consider join to a balustrade on a landing which needs to be 1000mm high.  
	Figure 27	What happens when stair set out is not like this and risers are in line? A new drawing option should be provided.
<b>13 Handrails</b>	(e)	Sometimes needs to be 1000mm minimum for BCA or is this covered by (f)?
<b>14 Doorways, Doors and Circulation Space at Doorways.</b>	14.1.1 para 1	Specify level of luminance (eg 30%).
	14.1.1 (a)	Add (e) Door jamb and adjacent wall
	14.2	Clause 6.8 does not exist and needs to be defined. Also the minimum height, width and location of glazing in doors (and fire doors where maximum glass area is specified which is less than required by AS1428.1 2001)
	14.3.2	Need to consider outward opening at end of corridor where there is no need to go past the door. The circulation requirements are less than fig 30 g. It is more like a sliding door and needs 1280mm.

		
	14.3.3	<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 <math>W_L</math> is not required. (See Figure 31(d))</p>
	14.4.4	Is this more appropriately referred to as "powered" doors?
	Figure 33(a)	<p>Does a handle without the end return comply as they are the most used and operate satisfactorily?</p> 
	Figure 34(b)	Why is there a maximum specified as functionally it does not matter
	14.6.2 (b)	Why is there a maximum specified as functionally it does not matter
	14.6.2 (c) and (d)	No maximum gap specified here?
	14.5.2 (f)	<p>What is an acceptable finger grip as they can provide a satisfactory means to a sliding door.</p> 
	14.6.3	Insert the following after "barriers" in line 1: "Or similar (eg children's part of a hospital)"
15 Switches and general purpose outlets (power points)		No comment

<b>16 Sanitary facilities</b>	16.2.5 d and Fig 41b	The angle of the seat will not be met with standard pan, no cistern and grab rail in correct position which should be an acceptable solution
	Figure 43	Please define position of call button as they are sometimes specified.
	16.3.2 (d) (i)	Repeats 16.4.2.
	16.4.1	Does this mean one long mirror on a wall and not above a basin is not acceptable? (If so, this would be unusual especially when no mirror is required).
	16.4.2	Repeats 16.3.2 (d) (1)
	16.4.3	Do soap dispensers/holders have to be recessed?
	16.5.2 (d)	Can whole floor drain to shower outlet? It makes sense to permit this? A continuous grated outlet should be permitted as it is better as it has less conflicting slopes
	16.5.6	Should be able to be reached while sitting down, (ie maximum 1350mm) by means of a lever etc.
	16.5.7	Can it be recessed or surface?
	16.5.9 (c) and (d)	<p>Define "front corners" and "top edges" better.</p> <p>IS THIS A FRONT CORNER OR A TOP EDGE ↓</p> 
	16.5.9 page 78 first para after points	Why so prescriptive with the size of holes or gaps especially as a wider range would not affect its use.
	16.7.3 Para 3	Should read "Doors shall have a hinge or closer..."
	16.7.5	Height range is inconsistent with 16.4.4 which reads 1200 – 1350mm

STANDARDS AUSTRALIA/ STANDARDS NEW ZEALAND – COMMITTEE ME-064 ACCESS FOR PEOPLE WITH DISABILITIES		
DESIGN FOR ACCESS AND MOBILITY		
PART 4.1 TACTILE INDICATORS		
Part 4 Tactile Indicators	2.1.2	What luminance contrast applies for integrated TGSi when drainage holes drilled between tactile buttons?
	2.2.2(e)	It is not clear where 300-400mm wide is used. Delete Para or at least add "min" as in 2.2.2(g).
	(g) and (b)	These two clauses cannot be achieved for a curved line which is acceptable as indicated in Figure 5.
	Figure 2.3(a)	<p>Mark distance from edge of last riser to doorway as "x"</p> 
	Figure 2.3 (c)	This layout is applicable to the main floor of most stairs and when x (as marked on figure 2.3(a)) is not defined it could be misleading. This diagram should have TGSi 600-800mm wide. The use of 300-400mm wide TGSi should only apply when an intermediate landing, which is enclosed, does not have continuous handrails. See also comment on Figure 3(a).
	Figure 3(a)	Note figure 2(c) is enclosed; figure 2(a) is not enclosed
	Figure 4	Manufacturers often will not warranty an installation if TGSi are added to service access plates which are often within the area indicated. Needs flexibility or a note to consider this situation.
	Figure 7	It would be useful to define what minimum height or gap is acceptable without TGSi eg normal accepted gap is 300mm. The situation of what is acceptable for a sloping wall or structure before TGSi are required should be defined. The following is suggested:

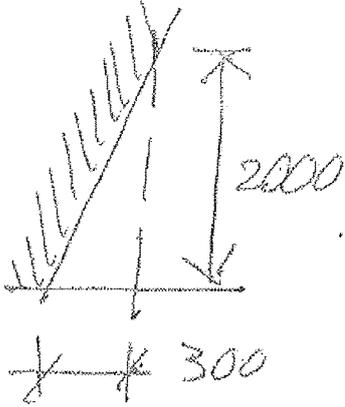
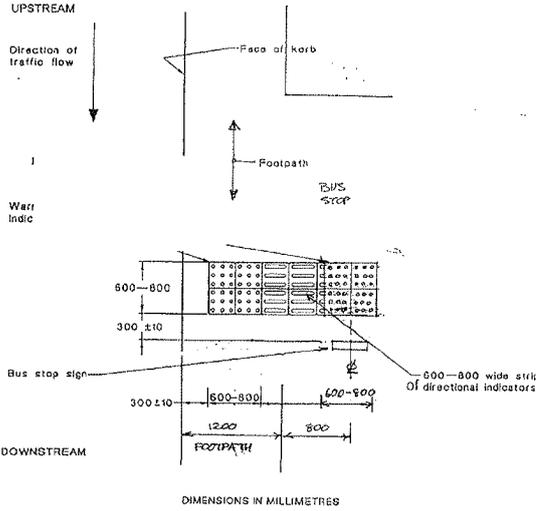
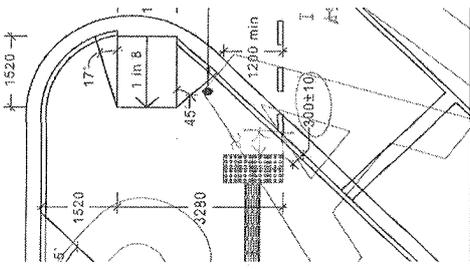
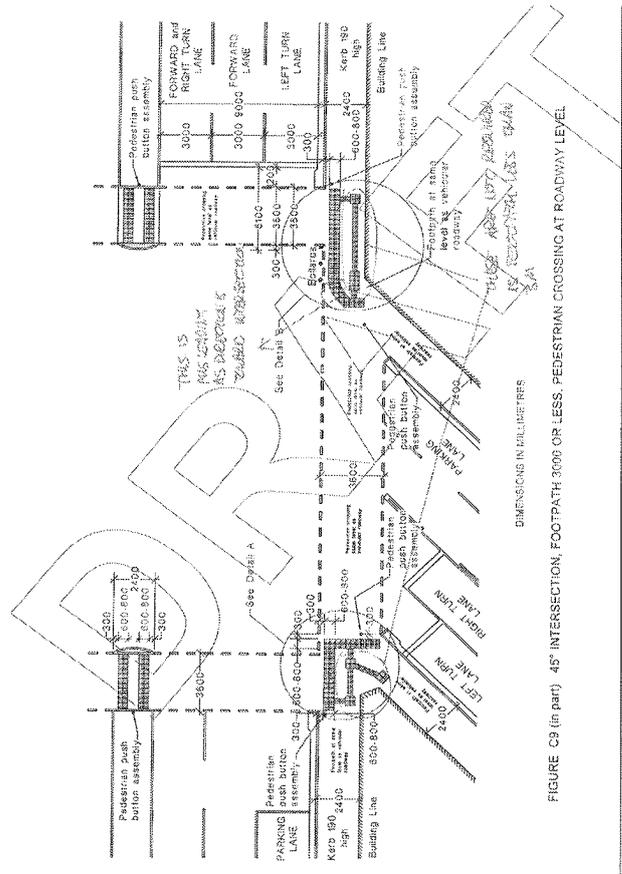
		 <p>When 2000mm is not achieved within 300mm a barrier or TGSi are required.</p>
	<p>Figure 11</p>	<p>Please provide a layout for a bus stop with a footpath against a kerb, eg</p>  <p style="text-align: right;">Figure 4.13-D Bus stops</p>
<p><b>Appendix C Kerb Ramps, Medians and Multiple Entry Points</b></p>	<p>Figure C1</p>	<p>The 1200mm access width (B) is supported. AS1428.1 identifies that the space should be this wide. This comment applies to other drawings in this draft.</p>
	<p>Figure C2(A)</p>	<p>Please illustrate non-standard curves or where kerb ramp is in a wide curve.</p>
	<p>Figure C2(C)</p>	<p>Please identify the minimum acceptable angle for sloping surface next to ramp (shown as 27°). We note that 45° angle shown at corner. What happens when 45° cannot be achieved? ie. is it acceptable as is indicated elsewhere including down to 17° in fig.C8</p>
	<p>Figure C2(F)</p>	<p>Extend directional indicators to meet tactiles in both directions to be consistent with principle that directional should extend between warning indicators</p>

	Figure C3	To be consistent with corners and changes of direction, should the commencement of directional indicators against the building line be warning indicators? This comment applies to other figures as well.
	Figure C8 p48	Note angle from ramp to pedestrian push button assembly is 17° (refer comment on fig C2 c)
	Figure C8 p49	Mark distance from tactiles to pedestrian crossing marker as "x" (as shown on excerpt from figure C8 below).  I query this approach of dimensioning parallel to the kerb as the whole methodology is 300mm from a hazard which is in the direction of travel and suggest the 300mm should be "x". This comment applies to other figures as well.
	Figure C9 p 51	Please note comments on diagram below:  FIGURE C9 (in part) 45° INTERSECTION, FOOTPATH 3000 OR LESS, PEDESTRIAN CROSSING AT ROADWAY LEVEL. DIMENSIONS IN MILLIMETRES DR: 04020-4944-PDR.doc - 12/6/2004 10:24:05
	Figure C9 p52	Please note comments on diagram below:



STANDARDS AUSTRALIA/ STANDARDS NEW ZEALAND – COMMITTEE CE-001 – PARKING FACILITIES		
PARKING FACILITIES AS 2890 PART 6		
<b>Part 6 Off Street Parking for people with disabilities</b>	Figure 2.5	Walkway as shown does not meet AS1428.1 which requires a 1000mm (or 1200mm) path of travel plus 600mm as in AS1428.1 Draft Feb 2009 Clause 11.2 (a)
	Figure 2.6	Refer comment above.
	2.4 Para 1	Headroom of 2200mm needs to increase to 2300mm (as in AS2890 Part 1 2004 Clause 5.3.1 Note) to cater for taller vehicles which are becoming more widely available.
	3.1	Are other contrasting colours acceptable? We recommend that they should be possible eg. safety yellow

Yours faithfully

Eric Martin  
 Director  
 Registered Architect  
 ACT376 VIC5150 NSW5991  
 WA1663 QLD3391