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Clerk Assistant (Committees) House of Representatives Parliament House CANBERRA ACT 2600

I wish to make some comments on the proposed Premises Standards.

These comments are my personal comments but to put my comments in context I am the Engineer for Housing SA and have been involved in disabled access, particularly as it relates to residential buildings for many years. That said these are my comments and are not to be taken as representative of the views of Housing SA or the Government of SA.

While I am pleased to see that existing toilets are to be accepted there are also issues with ramps, doorways and widths of corridors that have changed from time to time but while not complying with the proposed update of AS1428.1 seem to be generally working and are often difficult to change.

I have delved into the history and would like to try to put the A90 and A80 chair in context. They were developed by John Bails about 30 years ago when he measured the space the wheel chairs and other aids of that time required. As he had limited resources he purposely picked those items that he expected would require the most space, flattest ramp etc. Hence while the 80th and 90th percentile are often quoted they are based on about the worst 20% and so allow access to a much higher percentage of people with a disability. That is the reason the A80 chair dimensions actually allowed for almost all people. In addition this chair is a manual chair and clearance for hands is required. My research has shown most electric chairs are slightly narrower and no hand space is needed. Hence I suggest the new standard may be requiring more space while the wheel chair users actually require less width. Despite its age John Bails work is still some of the best published research I have been able to find.

I would question the use of tactile indicators. They have been misused for years and if people actually used them there would have been many serious accidents. I believe they were a good idea that has been demonstrated to be unnecessary. They also tend to tip trolleys or make the goods on the trolley fall and have tripped elderly people. The concept of the visual marking on platforms and the like is good but as far as the tactile indicators are concerned I do not think they work. I can not understand why they are needed by an escalator as escalators have a distinctive cover over the motor.

One issue I have with the continual path of travel concept is how it applies within an open plan office, and the individual work areas on that floor. It can be very restrictive on floor coverings.

There may be some advantages to defining the public areas of class 2 buildings and the requirements of those parts or else there can be claims above and beyond the premises standard imposed on some of those.

Does this standard apply to footpaths within a complex of class 2 or class 3 buildings? How about from the public road to the complex? The topography may make that very difficult. Again in those areas electric vehicles may be used and they can negotiate paths much steeper than 1 in 14. The transport standard recognises this with the steepness of ramp allowed into a vehicle.

I trust these comments are useful. Please contact me if you need any more information or clarification.

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