

Submission to the Second Review of the Premises Standards 2010 by Spinal Life Australia

The following items are presented for consideration:

Fit out:

Poor, unregulated fit out frequently ruins the best work of building designers. As access and inclusion advocates, we constantly see well designed buildings rendered non-functional or difficult to access due to poor fit out. Fit out is covered in the Disability Standards Accessible Public Transport (DSAPT) so the question arises: Why not in the Premises Standard? Here is one example: There is nothing about beds in Class 3 (accommodation) buildings yet beds are in the DSAPT. We also note how poor fit out adversely impacts employment opportunities for people with disability. We recommend fit out receive prioritized assessment for inclusion in the Premises Standards.

Gold Standard for houses:

On 30 April 2021, Australia's Building Minister's agreed to mandate the Silver level of accessibility into the National Construction Code (NCC) for new housing from September 2022. Welcome news on the one hand but Silver level is insufficient for various populations and does not progress housing equity in Australia, which is notable because of the faith the community put in the Kirribilli Agreement 2010-2020 only to see 10 years wasted under self-regulation. The difference between Silver and Gold levels is stark: Silver level supports people who are ambulant. Gold level is the minimum level required for people who use mobility aids – and they are significant populations, the primary sectors being the Over 60s, people with disability, medical conditions and young families requiring accessibility so grandparents can visit and support them. All new class 1a houses and class 2 sole occupancy units should be built to the Livable Housing Australia Gold standard.

One further point: Spinal Life surveyed its members in 2020 asking what it is like 'Living with a disability in inaccessible housing'. The survey indicates a significant impact connecting inaccessible housing and employment.

The question was asked: Has a lack of accessible housing ever....

Prevented you taking a job?	30%
Reduced your hours of work?	28.33%
Reduced your productivity at work?	25%
Led to losing or giving up a job?	<u>16.67%</u>
Total:	100%

Accessible Adult Change Facilities in all major transport buildings:

Accessible Adult Change Facilities are currently not required in any public transport premises except airports.

F2.9 Accessible adult change facilities

(2) One unisex accessible adult change facility must be provided in an accessible part of a:

(e) passenger use area of an airport terminal building within an airport that accepts domestic and/or international flights that are public transport services as defined in the Transport Standards.

Rural airports serviced twice weekly by 32 seat aircraft now require Accessible Adult Change Facilities. Rail stations and ferry terminals that see thousands of passengers per hour at peak times do not. All major public transport premises should have Accessible Adult Change Facilities.

Arguments that rail stations are not destinations and therefore should not have Accessible Adult Change Facilities are nonsensical, given every rail station is a destination in its own right for visitors and residents alike. These rail stations all have public toilets, including accessible unisex toilets, and should not discriminate against people who need Accessible Adult Change Facilities.

Lifts to AS1735.12-2020:

The Premises Standards currently reference AS1735.12-1999 *Lifts, escalators and moving walks Part 12 Facilities for persons with disabilities*. This Standard is badly out of date. The current version of the Standard is AS1735.12-2020. It is a vastly improved and contemporary Standard and should be the Premises Standards referenced Standard.

Hearing augmentation to AS1428.5:

The Premises Standards have requirements for hearing augmentation systems but provide no technical reference to ensure that the system is fit for purpose. The relevant Australian Standard is AS1428.5 *Communication For People Who Are Deaf Or Hearing Impaired* and this should be referenced in the Premises Standards.

Signs to AS1428.4.2-2018:

All signs between 1200-1600 mm above floor level and that identify facilities or which provide wayfinding information should have tactile and braille components as per AS1428.4.2-2018 *Design for access and mobility Means to assist the orientation of people with vision impairment - Wayfinding signs*.

Guide dog toileting areas:

Guide dog and assistance dog toileting areas provide greater independence for people who depend on assistance dogs for mobility. They should be available in places of public assembly and any major commercial buildings. Brisbane airport has two excellent examples of assistance dog toilets and these should be the template for indoor assistance dog toilets¹.

Quiet spaces:

Places of public assembly should have quiet spaces available for people who experience sensory overload. Sports stadiums^{2, 3} and some airports⁴ are beginning to install these features. They should be available in any larger shopping mall, place of public assembly or commercial building.

Upgrading the Transport Premises requirements in H2:

The current requirements for public transport premises are situated in Part H2 of the Premises Standards. They were imported from the *Disability Standards for Accessible Public Transport 2002* in 2010. Part H2 is likely to soon be out of synch with the *Disability Standards for Accessible Public Transport 2002* as these Standards are undergoing modernization. H2 should reflect the requirement of the *Disability Standards for Accessible Public Transport 202X* when they are published.

Fit for purpose access paths:

Ramp and lift alternatives to stairs and escalators are often far less convenient and can present travel bottlenecks. The Premises Standards require ramp and lift alternatives but have no statement regarding the provision of an equal level of service to stairs and escalators. This can result in reduced amenity of access for people who have mobility impairments.

Ramps and lifts should offer the same pedestrian level of service at all times as stair and escalator alternatives. Level-of-service category C (based on J. Fruin (1987) *Pedestrian Planning and Design*) is the TransLink worst-case acceptable level of service in public transport environments in Queensland⁵.

¹ <https://www.bne.com.au/passenger/passenger-information/special-assistance/assistance-dogs>

² <https://www.ausleisure.com.au/news/nrl-and-afl-launch-sensory-rooms-at-some-venues-to-connect-with-all-fans/> ,

³ <https://www.abc.net.au/news/2019-05-01/afl-quiet-rooms-help-fans-with-special-needs-at-football/11039204>

⁴ <https://www.internationalairportreview.com/news/76072/gatwick-sensory-room/>

⁵ <https://www.publications.qld.gov.au/dataset/public-transport-infrastructure-manual>

For pedestrian horizontal travel (that is, walkways and overpasses) and platform waiting areas, TransLink typically prefers that a LOS C (between 0.65–0.9 square metres per person of personal space) be achieved as a minimum during peak periods.

Fire refuges:

Fire refuges become overcrowded as floor level rises. Refuges must be of a size able to cope with demand which means more or larger refuges on higher floors. A scale of increasing refuge size based on a ratio of floor height above ground, floor occupancy levels and the anticipated proportion of occupants not able to evacuate via the fire stairs is required.

The number of people not able to evacuate via the fire stairs due to restricted mobility increases with floor level. Refuge size remains static from floor 1 to floor 40. At a certain level above ground the number of people seeking refuge exceeds refuge capacity.

The gold standard for fire refuges is to place them at the landing of the fire rated goods lift. People with impaired mobility can be evacuated without crossing an affected area and not have to wait out the emergency in a fire refuge distant from the lift. These should be the recommended refuges.

Carparks / passenger set down

Disability car parking is well covered in the Premises Standards but no mention is made of accessible taxi zones or accessible passenger loading zones. These features should be accessible if they are provided in off-street car parks associated with commercial premises. Accessible vehicle and taxi spaces should be based on the parallel parking layout of AS2890.6-2009 *Off-street parking for people with disabilities*.

Power operated toilet door:

Try this test: put yourself in manual wheelchair seeking to independently access an outward opening door in a public unisex accessible toilet. It is hard to avoid pulling the door onto your wheelchair because it is difficult to get out of your way! Further, carers or companions assisting wheelchair users to enter or exit a public unisex accessible toilet must often hold a door open while simultaneously pushing or pulling the wheelchair through the door. This is a difficult and not always a safe manoeuvre. Power assisted doors will solve the difficulties. These are increasingly common in shopping centres and should be the rule rather than discretionary.

Kerb ramp gradient:

Kerb ramps are one of the most critical pieces of infrastructure creating an accessible path of travel for wheeled devices, e.g. mobility aids, prams/strollers, trolleys – and for people who cannot climb steps. However, their usability depends on the gradient and the current minimum 1:8 is too steep for all users and would benefit significantly from a modest upgrade. American legislation specifies 1:12. The City of Gold Coast Council did mobility device testing in Coolangatta and shifted their policy to 1:10 for new work. Spinal Life, having tested and examined this issue through the lived experience of its members over many years would agree with 1:10. We acknowledge that further testing is required and urge that it occurs in order to reduce accidents and offer greater certainty to all users who require kerb ramps to successfully complete the round journey from home to destination to home.

Accessible tourism:

It is timely to draw attention to the way accessible tourism is impacting Australia's social and economic performance. Much can be attributed to the Disability Standards Accessible Public Transport (DSAPT) which required 90% compliance by 2017, allowing greater participation in day trips through accessible public transport. A compilation of research below sets out key data:

"My TravelResearch.com" has completed major research on Accessible Tourism in Victoria, Queensland and Australia in 2017. The research says the contribution of Accessible Tourism to the Australian Visitor economy is \$10.8 billion

- Tourism Research Australia's (TRA) National Visitor Survey (NVS) 2017 First Quarter data on day and overnight trips shows that:
- People with disability spent \$3.3 billion on tourism services, accounting for 17 per cent of all tourism expenditure
- On average, people with disability spent more on day trips than people without disability, \$111 compared with \$106
- People with disability took around 9 million day trips, which accounted for 21 per cent of all day trips
- Expenditure was \$2.9 billion for older people and \$2.7 billion for young families.

"Inclusive tourism: economic opportunities"

This report is part of a project being implemented by the University of Technology Sydney Institute for Public Policy and Governance and Local Government NSW to enable local governments and tourism operators in

New South Wales to improve access to their infrastructure, services and products. Search at: <http://apo.org.au/node/133611>

In view of its importance to Australia's visitor economy, greater emphasis is required in the area of accessible accommodation - and event venues, noting the Cairns Convention Centre remains an excellent model as does Robina Stadium on the Gold Coast.

Further, across the Premises Standards, greater acceptance is needed for intuitive design to meet visitor and tourism requirements, given that visitor numbers per annum significantly exceed the resident population of most Australian cities and towns. Visitors are categorised as those from intrastate, interstate and overseas. The following example includes a capital city, large regional city, small regional city:

Brisbane residents 1,400,000 plus visitors = 9,195M

Cairns residents 164,000 plus visitors = 2.88M

Griffith, NSW residents 27,000 plus visitors = 750,000

These figures underscore the emphasis to achieve intuitive design in tandem with universal design principles.

Connecting the Premises Standards with the market:

There is no subtle way to say this but we offer the observation that the Premises Standards is possibly a victim of its integration into the National Construction Code given many planners, designers, builders and certifiers do not take note of it, they just read the National Construction Code. This will require cultural and political change - and one government department needs to take a leadership role to resolve it.