



Submission: Access to Premises Standards Review 2021

Access to premises is critical for social and economic participation

NDS welcomed the introduction of the 2010 Disability (Access to Premises – Buildings) Standards (the Standards) as an essential part of the Australian Government's commitment to social inclusion. These Standards play an important role in implementing the objectives of the National Disability Strategy, which is critical to the economic and social wellbeing of all Australians.

The impact of the Standards is broad. Improved accessibility in premises can make life easier for a wide range of people including young families, an increasing older population and people recovering from temporary impairments. However, for some people the benefits are life changing. Increasing access to premises for these people over time will bring greater life opportunities. This includes options to attend training courses, take on a job, run a small business, buy or rent accommodation, study and enjoy more choice in travel and leisure destinations.

The National Disability Insurance Scheme, now fully implemented, is improving the lives of people with significant disability. Its impact will be maximized if our collective social and economic infrastructure becoming increasingly accessible. The Premises Standards play a key role in making this happen.

Maintaining this regulation is critical to ensuring equitable access

NDS appreciates this opportunity to reinforce the need for an effective regulatory approach. NDS strongly advocates for implementation of universal design for many aspects of building regulation, especially for new constructions. In this way, our community infrastructure will slowly become fully inclusive at minimal cost, while offering the extensive social and economic benefits outlined in the National Disability Strategy. These Standards have begun this process as they have legislative backing and are incorporated into the Building Code of Australia.

As demonstrated in the housing sector, the alternative of taking a voluntary approach does not work. In 2010, the National Dialogue for Universal Housing Design representing government, housing industry and community sectors agreed to an aspirational target for all new housing to provide specified minimum access features by 2020. Interim targets were also set. Livable Housing Australia was charged with promoting the agreement in 2011 and was funded by the Australian Government for the first four years. Despite these efforts, the housing industry has fallen a long way short of the target. A generous estimation is that the voluntary approach will achieve less than

5% of the National Dialogue's 2020 target¹. Lessons from this experience should be heeded when considering any proposals to weaken the Premises Standards.

Stronger commitment to co-design with people with disability

Architects and developers working on premises should involve people with disability early. Working with a group of people with a range of disabilities will help identify and find solutions to access issues early.

An example is the Perth Optus Stadium which was co-designed with people with disability. NDS also provided input through working and steering groups established by the WA Government. This type of consultation co-design should be mandatory, especially for large scale projects, both public and private. Ultimately, getting the infrastructure project right at the beginning saves on refitting it and outlaying the significant associated costs down the track.

Improved access and egress

Access and egress must be prioritised within the Standards, with people with disability raising the importance of the following:

- Take a holistic approach such as the need to look well beyond the building to ensure there is a continuous accessible pathway—it is not worth doing one part and forgetting other important elements (for example, it is not worth having a fabulous accessible car bay if you cannot access the parking meter, the ramp is too steep or the path is uneven)
- Proximity to accessible public transport for those who do not drive to the premises
- Accessibility of security measures such as internal building access via swipe cards that open automated gates and doors—for example how long does it remain open and is it suitable for people using mobility aids?
- Number, proximity and accessibility of surrounding areas of accessible parking bays
- Width of pathways leading up to a building should consider the dimensions of the largest mobility devices to ensure others can move safely around them
- Voice activation technology should be incorporated in lifts alongside the best placement of buttons and auditory announcement of floors
- Placement and heights of counters, door handles, light switches, and touch screens so they suit people of all disability types
- The following examples demonstrate the importance of considering access and egress issues for all people with disability as a first priority -

Toilets and change room provisions

NDS has been a vocal supporter of the need for more fully accessible toilets across Australia. We are opposed to any reduction in accessibility.

Changing Places should be installed in all new public buildings, with no exemptions for places that many Australians visit—such as stadiums, recreational facilities, major tourism sites and national parks. The locations of Changing Places toilets should be

¹ Australian Network for Universal Housing Design, 2015. Report on the Progress of the National Dialogue on Universal Housing Design 2010-2014

listed on accessibility websites e.g. <https://changingplaces.org.au/find-changing-places-toilet/> and <https://toiletmap.gov.au/>.

All accessible toilets must contain sanitary disposal bins—this is currently not the case. There is an urgent need to improve the design of many accessible toilet doors; they are often heavy and do not have an easy open mechanism.

Compliance

Complaints processes should be easy to access and readily available to complainants.

A better auditing system is required so that checks are made on the ‘true’ accessibility of a building (noting earlier comments, for example, about assessing accessibility beyond the parking bay itself).

The experiences of people with disability trying to make a complaint about a premise is often unsatisfactory—following it through becomes ‘too hard’ to persist with. We need to have better and more responsive mechanisms in place.

Complaints about older building need to lead to an audit taking place. There may be a relatively inexpensive ‘quick’ fix which would improve the accessibility of the building and resolve the complaint. Complaints need to be taken seriously and measures to address them thoroughly explored.

Communication and wayfinding

Greater attention should be given to embedding wayfinding in all public buildings. It should not be addressed as an afterthought.

Accessible wayfinding and accessible navigation is critical for people with disability—linking the two is essential. Accessible wayfinding is the process of finding routes between pairs of locations that are accessible (an ‘accessible route’), and is often used for pre-trip planning. Accessible navigation is the process of determining the current location of the user on an accessible route and providing step-by-step instructions for navigating on it.

Wayfinding standards should form part of the Access and Premises Standards These should give specific guidance for example on the design and installation of static signage to assist people who are blind or have low vision to navigate the built environment.

The main body of the Standard should provide detailed examples and measurements for the design, location and installation of tactile signs at building and site entry points and for rooms and facilities. They should also be a compulsory part of the National Construction Code from 2022, so that they are understood and incorporated into design briefs.

Environmental sensitivities

Suitable accessible flooring should be considered. Some flooring is easier than other types for people in manual wheelchairs to self-propel on. When wet, some floors become slippery and unsafe and this is a particularly an issue for users of electric wheelchairs who may not be able to adequately brake on it.

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National Disability Services is the peak industry body for non-government disability services. It represents service providers across Australia in their work to deliver high-quality supports and life opportunities for people with disability. Its Australia-wide membership includes over 1150 non-government organisations which support people with all forms of disability. Its members collectively provide the full range of disability services—from accommodation support, respite and therapy to community access and employment. NDS provides information and networking opportunities to its members and policy advice to State, Territory and Federal governments.