



12 June 2015

Premises Standards Review Team
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Dear Premises Standards Review Team,

Submission Review of the Disability (Access to Premises-Building) Standards 2010

Hobsons Bay City Council is pleased to have the opportunity to provide the enclosed submission to the review of the Disability (Access to Premises-Building) Standards 2010.

Council is committed to working towards achieving a fully accessible and inclusive municipality where all residents, regardless of their ability can reach their full potential and lead fulfilling lives.

Council looks forward to the outcome of the consultation and the reviewed standards. If you would like further information about this submission, please contact Natalie Walker, Director Strategic Development on 9932 1096 or email nwalker@hobsonsbay.vic.gov.au.

Yours sincerely,



Chris Eddy
Chief Executive Officer



Hobsons Bay City Council Submission Review of the Disability (Access to Premises-Building) Standards 2010

Through its Disability Access and Inclusion Plan, Council is committed to promoting and protecting a municipality which is conducive to wellbeing, where all people can live, work, learn and play now and into the future. In addition, Council is committed to working towards achieving a fully accessible and inclusive municipality where all residents, regardless of their ability can reach their full potential and lead fulfilling lives.

One way Council aims to do this is via the application of the Universal Design principles. Universal Design is defined as *"the design of products and environments to be usable by all people, to the greatest extent possible, without the need for adaptation or specialised design"* (Ron Mace et al, 1997). It includes seven principles:

1. equitable use
2. flexibility in use
3. simple and intuitive use
4. perceptible information
5. tolerance for error
6. low physical effort
7. size and space for approach and use

Below is Council's response in relation to the key consultation questions.

Accommodation Buildings

There is a scarcity of accessible accommodation within Hobsons Bay. Council agrees that there is a need to ensure that hotels and motels provide accessible bedrooms/dwellings. Rather than only provide a specific number of these, Council would suggest that all bedrooms/dwellings developed include the principles of Universal Design, to ensure that they are accessible for not only people with disabilities but also by older people, children, people using prams, and people with low literacy levels. These principles and accessibility should be the standard for all dwellings within accommodation buildings rather than just a few within a complex.

In addition to this, Council would suggest that this recommendation extends past hotels, motels and hostels to also include large development sites. Currently dwellings are being developed that are not accessible for all and unable to support the principles of ageing in place and the family lifecycle. It should be mandatory that private developments that exceed 20 dwellings also have to meet the requirements of Universal Design within a substantial part, if not all, of the development. This will ensure that we are building housing that is accessible for all communities.

Accessible Sanitary Facilities

Accessible sanitary facilities are key to ensuring that community members are able to access places and spaces with flexibility. Council is still working through improvements to ensure public toilets are accessible for all. Within new buildings that are of significant monetary value, Council has aimed to ensure that they include an accessible change



room, including hoist. Where funds have not allowed this, Council has aimed to ensure that the accessible toilet is large enough and structurally supportive of a hoist and change table for installation in the future.

Council suggests that this approach be taken in the reviewed standards to ensure there is an increase in accessible change rooms and or the ability to easily adapt toilets should this be required.

One issue that arises when implementing accessible toilets or change rooms, is the appropriateness of including baby change tables within the space. While there are dimensions available to support this inclusion, further clarification regarding appropriateness of this would be welcomed and if a separate space is required.

Passenger Lifts

The installation of unenclosed passenger lifts, such as stairway platform lifts, is often the outcome of poor initial planning, especially within new builds. Requirements should be in place to ensure that this is avoided in initial plans. If unenclosed passenger lifts are required as part of an upgrade to a building the operation of the lift needs to be accessible for all, allowing for independent usage without relying on someone else to operate it.

Currently, as the standards read, the installation of enclosed lifts in new apartment developments, or major renovations within apartment developments, of more than one sole dwelling (e.g. Class 2) is currently not covered by Premises Standards. This means that apartments are being developed with more than one level and only including stairway access. These apartments are not universally accessible nor are they supportive of ageing in place. It is recommended that this be reviewed to ensure that, at a minimum, a criterion is included to incorporate larger apartment developments to be covered by the Premises Standards.

Swimming Pools

Swimming pools can be a key physical as well as socially inclusive activity for people with disabilities. It is important that a holistic approach is taken to access, inclusive of the principles of Universal Design. This needs to include multiple access options to and from the water, signage around the pool, surface areas, accessible toilets, and accessible change facilities.

Accessible Car Parking

Accessible car parking should also be a mandatory requirement for all public areas that have more than 20 parking spaces. While this is the case for some areas, there are places that still do not meet this requirement. Additional monitoring and accountability for the implementation of this requirement needs to be established. In addition, as informed via community feedback, it would be beneficial to see an inclusion of principles relating to shade and shelter in the accessible parking standards.



Public Transport

Accessible public transport is a key issue for residents within Hobsons Bay. Gaps within existing legislation have allowed inaccessible buses to continue to operate across the municipality as well as the development of train stations, such as Laverton, which are reliant on lifts which are at times not in operation therefore leaving people stranded on the station and unable to get to their destination. It is essential that public transport is compliant to access standards and Council would encourage that these are inclusive of the principles of Universal Design.

Way Finding

Way finding is key to ensuring people are able to negotiate and move around their environment. Council currently implements tactile ground surface indicators (TGSIs) across the municipality however there is often uncertainty in relation to how much is too much as TGSIs can also pose as a barrier to some people in wheelchairs as well as decrease surface resistance when wet. Further clarification regarding appropriate location and usage would be welcomed as well as alternative features for marking hazards which could be used.

Further clarification in relation to way finding signs is also welcomed. This needs to include orientation, path of travel options, and key destinations. Types of signs including colour contrasts, size, and placement also need to be articulated.

Emergency Egress

The development of a non-regulatory handbook is useful for established buildings. The development of new buildings should take into account the inclusion of elements within option one of the standards. In addition, owners of existing buildings should ensure that processes are in place to support the safe and efficient evacuation of people with disabilities.

Small Building Exemption

Buildings that are being developed, regardless of size, should be accessible for all. While it is recognised that this could have an impact on costings, buildings should not be developed if they are not accessible as this impacts employment opportunities and business opportunities from not only people that have a disability but also their families and carers. It is recommended that the small business exemption, when building a new building or making significant changes to a current building is not given.

Lessee Concession

The current lessee concession is appropriate in the situation where the lessee should not have to make structural changes if they do not own the building, however if a path of travel is not accessible from the entrance of a building to the areas of new work the owner of the building should be required to make the necessary structural adjustments and the lessee make any non-structural adjustments (e.g. moving furniture). A mechanism to ensure that these costs are then not passed onto the lessee needs to be considered.



Unjustifiable Hardship

Unjustifiable hardship should only be given in very rare circumstances and should include the requirement for the applicant to identify how they will work towards improving access.

Inconsistencies in the Interpretation and Application of the Premises Standards

Feedback received internally as well as from the community is that the standards are hard to interpret and apply. To ensure that Council complies with the standards it undertakes an external access audit of infrastructure designs. While this is effective it means that infrastructure can only be meeting the minimum requirements rather than looking at the principles of Universal Design. In addition, in the stages between design and build, structural elements may be altered which could impact access which is not realised until completion. Additional training needs to be given to Council staff, builders, and architects regarding access requirements, including the principles of Universal Design and the importance of ensuring access for all.