



3<sup>RD</sup> March 2016

To the CEO and Executive of Standards Australia  
Dr Bronwyn Evans  
Chief Executive Officer

Aidrian O'Connell  
Adam Stingemore  
Karen Riley-Takos  
Bala Balakrishnan  
Archer Whetham  
Executive team

**We write to express our concern in regard to Draft Standard DRAS 1428.4.2:2015 Design for access and mobility. Part 4.2: Wayfinding.**

We appreciate that considerable time and effort has been spent in drafting this document, however we see the principles embodied in this Draft Standard as a backward step in assisting the disability sector that it focuses on as well as the community at large. We do not believe the Australian community needs this Standard and do not see how this Standard would provide a Net Benefit.

The standard is intended to be part of the existing suite of AS1428 Standards that address design for access and mobility and has been prepared by Standards Australia Committee ME-064, Access for People with Disabilities. The new Draft Standard prescribes a network of specific elements incorporating tactile (raised) lettering and Braille messages and delineated pathways that are marked by changes in surface colour or texture into a building or public place. These elements are intended to form part of the built environment. They are described as a Wayfinding System that is intended to assist blind and vision impaired people to circulate through any site independently.

Our concerns regarding the impact of this Standard are as follows:

1. It will have a significant impact on building design and there has been very limited consultation with building design professionals in its development.
2. It focuses on prescriptive solutions for blind and vision impaired people only rather than describing broad objectives to be achieved by good design.
3. It predetermines wayfinding design outcomes with one type of design approach with no recognition of new digital technology developments in signage and hand held devices.
4. This design approach mandates static technologies such as Braille (developed in 1824) with no scope for new digital technologies.
5. It will benefit very few members of the community, for instance, we estimate the number of blind people who can read Braille is approximately 0.1% of the whole population of Australia, that is approximately 23,000 people and yet this Standard mandates Braille signage throughout all public places.
6. Many aspects of it are untested and unproven in the real world.
7. It will be difficult if not impossible to implement in large complex public environments where good wayfinding design is most needed.

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8. It will effectively create two wayfinding systems for many public places - one that meets the requirements of this Standard and another visual system that sighted people would need to use.
9. It will come at a significant financial cost, easily doubling the current costs of wayfinding signage systems.
10. The document is open to considerable interpretation which will create confusion, conflict and inefficiencies in its implementation.

The Draft Standard would have significant impact on a range of building design professionals including Architects, Interior Designers and Landscape Architects.

We believe that this document does not meet Standards Australia's own definition of providing Net Benefit to the community as stated at [standards.org.au](http://standards.org.au).

Every Australian Standard, regardless of who develops it, must demonstrate positive Net Benefit to the community as a whole. All Australian Standards must provide a value or benefit that exceeds the costs likely to be imposed on suppliers, users and other parties in the community as a result of its development or adoption and implementation.

Also we note Standards Australia's Seven Benefits of Standards as stated on the website and point out that this Draft Standard is in direct conflict with item 2. Standards support Australian Innovation.

*2. Standards support Australian innovation Standards provide a platform on which to build new and exciting ideas. As our world changes, new Standards are introduced to reflect the latest technologies, innovations and community needs - redundant Standards are discarded.*

The public comment period for this Draft Standards has now closed. We hope that Standards Australia is able to thoughtfully assess the public feedback as well as consider more deeply the real world impacts and cost to benefit of this document.

Yours sincerely,

Finn Butler  
Director of Büro North

*Written with Mark Ross and Christopher Thorpe, with support from Sue Allnut, Charlie Bromley, Jack Bryce, Jacob Burke, Peter Campbell, Gary Edmonds, Garry Emery, Vince Frost, Hans Gerber, Mike Heine, Stephen Minning, Peter Moore, Kate Owen, Dominic Russo, Bruce Slorach, Mark Tatarinoff and Michel Verheem.*