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Creating an  
**Accessible** World

## Are TGSIs Required on Kerb Ramps?

The provision of Tactile Ground Surface Indicators (TGSIs) on kerb ramps and pram crossings is a rather complex element within the built environment and disability access. Firstly, TGSIs are for the purpose of providing sensory information for people with vision impairment or blindness. The requirements for the provisions of TGSIs are contained within the Building Codes of Australia (BCA) and Australian Standard AS1428.4.1 - 2009.

And that's where the complexities come in..... The BCA requires TGSIs, Section D3.8 (a) (iv), as shown below:

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*(a) For a building required to be accessible, tactile ground surface indicators must be provided to warn people who are blind or have a vision impairment that they are approaching—*

*(iv) a ramp other than a fire-isolated ramp, step ramp, kerb ramp or swimming pool ramp.*

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The BCA further states that when TGSIs are required by (a) then they must comply with the requirements of AS1428.4.1 - 2009

Therefore what the BCA requires is that buildings that are required to be accessible, noting that there are actually some buildings and parts of buildings that are not required to be accessible, that any ramps, that are not a, fire isolated ramp, step ramp, kerb ramp or a swimming pool ramp must have TGSIs. For example a ramp (Gradient between 1:14 - 1:19) that connects a lower level to an upper level requires TGSIs but a step ramp (Gradient 1:10) does not need TGSIs.

So where does this leave kerb ramps that are not in accessible buildings? And that's the exact issue. Technically speaking there are no mandated requirements to provide TGSIs at kerb ramps when considering the BCA and to some degree that's perfectly understandable as the intention of the BCA is: The BCA is a uniform set of technical provisions for the design and construction of buildings and other structures, and plumbing and drainage systems throughout Australia. It allows for variations in climate and geological or geographic conditions.

Basically it sets out how to achieve a nationally consistent set of minimum standards.



The overarching legislation that ensures people with disability have access to the built environment is the Disability Discrimination Act (DDA). Within Part 2 Division 2 - 22, the DDA states:

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*23 Access to premises*

*(1) It is unlawful for a person to discriminate against another person on the ground of the other person's disability or a disability of any of that other person's associates: (a) by refusing to allow the other person access to, or the use of, any premises that the public or a section of the public is entitled or allowed to enter or use (whether for payment or not)*

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Premises is defined by the DDA as:

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*Premises includes:*

*(a) a structure, building, aircraft, vehicle or vessel; and*

*(b) a place (whether enclosed or built on or not); and*

*(c) a part of premises (including premises of a kind referred to in paragraph (a) or (b)).*

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Therefore under the definitions shown from the DDA a kerb ramp could be considered a place and furthermore inclusive within the definition of a larger understanding of place - for example the town centre. The kerb ramps provide access to a place and therefore must be included in the scope of the broader definition of place.

With this understanding, the foreword of Australian Standard AS1428.4.1 - 2009 portrays the true intent of the Australian Standard to align with the intent of the DDA as it states:

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*People with disabilities have the right to dignified, safe and independent access to the built environment.*

*Approximately 330 000 Australians are blind or vision-impaired and many more have some reduction in the effectiveness of their sight, the majority of whom are over the age of 65 years. The ageing of Australia's population is expected to see the number of people with vision impairment double in 25 years.*

*This Standard deals with the application of tactile ground surface indicators in the built environment. Application of this Standard will enhance the safety, dignity and independence with which people who are blind or vision impaired have access to the built environment.*

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## 1.1 SCOPE

*This Standard sets out requirements for the design and application of tactile indicators for new building work, to ensure safe and dignified mobility of people who are blind or vision impaired.*

## 1.2 APPLICATION - 1.2.1 General

*This Standard is applicable to the internal and external built environment, throughout Australia and New Zealand, in potentially hazardous situations such as stairs, ramps, kerb ramps and level transition between pedestrian access ways and vehicle carriageways.*

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As can be seen the intent is to ensure people with a vision impairment or blindness have dignified, safe and independent access to the built environment and this therefore suggests that to ensure this right is upheld, the provisions of TGSIs must be met.

It is also important to note that Section 2 of AS1428.4.1 - 2009 states that hazard TGSIs are required at carriageways, where carriageways is defined as:

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*That portion of a road or bridge devoted particularly to the use of vehicles, inclusive of shoulders and auxiliary lanes. It is usually designated as that part of a public road (way) between kerbs.*

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Appendixes A and C of AS1428.4.1 - 2009 provide further informative examples as to the correct provisions of TGSIs at kerb ramps.

## CONCLUSION

To conclude and ultimately answer this complex question, it is most definitely a requirement of current legislation to provide TGSIs on kerb ramps. Granted there are design alternatives that allow situations to not provide TGSIs however these situations of good design are far and few between. Therefore it is ASN's professional opinion that the provision of TGSIs is absolutely required on kerb ramps and to not provide TGSIs could be seen as denying the right of accessibility for people with vision impairment or blindness to the built environment.

