

## **Portfolio committee No. 8 – Public Toilets**

**RESPONSE TO SUPPLEMENTARY QUESTIONS FROM 1<sup>ST</sup> APRIL 2025 HEARING**



**MHA (Mental Health Access) Design Statement in support of inclusive design tailored towards the needs of neurodiverse individuals.**

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**(1) Do you think an audit of accessible public toilets managed by councils and state government should be undertaken and if so, what are the basic standards that should be included?**

MHA's manual clearly identifies the lack of consideration shown towards ND requirements and in many instances the misrepresentation of supportive design features required for those living with psych social diagnoses. This highlights how outdated our existing standards and regulations are and demands an urgent audit to be made by professional and users within the sector.

The most basic standard, should be a heightened and diverse approach towards the definition of access.

“Ensuring people who have physical, mental, intellectual, developmental, or sensory impairments (that may hinder their full and effective participation in society), may access a given space on an equal basis with others”

**(2) What changes are needed to public toilets design to meet the needs of neurodiverse individuals?**

To better support neurodiverse individuals, public toilets must be designed with accessibility and sensory regulation in mind. A common issue is the placement of air dryers. When dryers are located too far from sinks or in hard-to-reach areas, it creates unnecessary physical and sensory challenges. For individuals with sensory sensitivities, the loud sound and forceful airflow of standard dryers can be distressing, especially in echo-prone, tiled spaces. Alternatives like paper towel dispensers or quieter, adjustable dryers placed within arm's reach can make a significant difference. This is not just applicable to neuro-diverse individuals rather also applicable to a range of disabilities.

Clear signage, intuitive layouts, and calm lighting also help create a less overwhelming environment. Additionally, offering gender-neutral and single-stall options can support those who experience anxiety or sensory overload in crowded spaces. In addition to these, flush sensors, tap sensors and auto door locks will allow individuals to build on their existing capacities. In terms of safety, defibrillator, first aid and adult changing spaces should be accessed with ease by participants and/or their care taker. Thoughtful design that considers both physical and sensory accessibility ensures that public toilets serve the full range of users, promoting independence and dignity for neurodiverse individuals.

In summary:

- Clear, uncluttered signage with symbols and plain language
- Sound-insulated spaces to reduce echo and reverberation
- **Remove hand dryers entirely** – they are distressing due to high-pitched noise; provide paper towels instead
- Manual, sensor flush and tap options – automatic features can trigger distress
- Soft, warm lighting – avoid flickering or harsh fluorescents
- Spacious cubicles with **simple, low-effort locks** and **strong privacy**
- Visual supports or step-by-step picture guides
- Avoid strong smells from cleaning products or air fresheners
- Gender-neutral and family-accessible options with thoughtful layout and privacy screens

**(3) What is the current level of community engagement by local and state governments when designing new public toilets?**

While there has been increasing recognition of the need for inclusive design, the level of engagement from neurodiverse individuals in public planning processes remains inconsistent as the invitation to contribute can often seem “tokenistic”. Some local and state governments are beginning to prioritise direct community consultation, often by hosting focus groups, town halls, or workshops where neurodiverse people and their carers can share their experiences (mainly in business sectors and university populated areas such as the city of Sydney government). Surveys are also being used to collect data on specific needs; however, engagement methods are not always tailored to the communication styles or processing preferences of neurodiverse individuals, which may limit participation.

For consultation to be truly effective, governments must use neurodiversity-affirming practices, including visual aids, plain language, and accessible meeting formats or engage a multidisciplinary team which is but not limited to psychologists, designers, disability specialists etc. Engaging this community meaningfully not only leads to more inclusive outcomes but also builds trust and ensures public spaces are usable for all citizens.

**(4) Can you describe the kinds of sensory challenges neurodiverse individuals experience in traditional public toilets?**

Traditional public toilets can be overwhelming for neurodiverse individuals due to the complex sensory environment they present. Loud, high-pitched sounds from hand dryers can trigger distress or sensory overload, especially in small, echo-filled rooms. In many facilities, dryers are mounted above sinks, requiring awkward movements or proximity to loud noise—further compounding discomfort.

Lighting may be too harsh or flickering, and strong cleaning product odours can also cause sensory irritation. Additionally, unpredictability in crowded public spaces—such as long wait times or unexpected noises—can lead to heightened anxiety. For individuals who struggle with time-based or executive functioning, even standing in line for 10 minutes can become intolerable, potentially resulting in emotional distress or behavioural escalation. These challenges are not simply about discomfort but can affect safety, independence, and inclusion.

Currently, it is evident that many disability providers report that community engagement is very dependent on similar factors which lead to limited participation of their clients. Addressing these sensory concerns through careful design and planning is critical for creating public facilities that are functional and welcoming for neurodiverse people.

**(5) You mentioned 'transition spaces' and 'low-stimuli environments' – what would these look like in a practical sense?**

- 1- Internal and external spaces which are organic in form and not rigid in design
- 2- Provisions in place for the user to access varied range in privacy with a base pre-requisite for open space
- 3- Prioritisation of natural light and for diffused LED light's featuring warmer tones in colour
- 4- Quieter fixtures to be installed including the hand dryer, toilet flusher, bathroom doors, toilet lid and vent
- 5- Use of neutral colours and minimal patterns in design of internal space
- 6- Removal of strong scents and fragrances

**(6) How important is it to include neurodiverse individuals in the design process for public toilets?**

1 in 8 Australians are neurodiverse. To exclude 15-20% of Australians from a conversation regarding their access and support is simply not acceptable. Inclusive design requires co-design with those most affected—especially people with sensory sensitivities, trauma histories, and cognitive differences.

Including neurodiverse individuals in the design of public spaces is essential to creating environments that reflect the full range of human needs and experiences. First-hand input from those with lived experience ensures that accessibility solutions go beyond minimum standards and genuinely improve comfort and usability. Neurodiverse individuals can offer unique insights into features that may be confusing, overwhelming, or distressing—such as overly complex layouts, unclear signage, or high-sensory environments. Their perspectives help designers simplify navigation (e.g., clarifying which tap or dryer to use) and reduce unnecessary cognitive load. Importantly, inclusive design benefits everyone—not just neurodiverse individuals—by making spaces more intuitive, calm, and user-friendly. When diverse voices are included from the start, costly redesigns can be avoided, and the final result is a more equitable and sustainable public infrastructure. Inclusion is not just a checkbox—it’s a strategy for excellence in public planning that fosters dignity, access, and belonging.

**(7) What would you like to see added to the National Construction Code or state-based design standards to better reflect neurodiverse needs?**

- 1- A review of definitions provided towards terms such as access and accessway
- 2- Consideration of both mental health and physical disabilities
- 3- Understanding that Neurodiversity goes beyond sensory sensitives
- 4- Appreciation for the use of transition/breakout spaces as often as possible
- 5- Incentives provided towards designers/builders for the provision of options and adaptability in design
- 6- Parent rooms are rarely designed with sensory or cognitive access in mind. Key recommendations include:

- A dedicated **low-sensory area** with soft lighting, calming colours, and minimal noise
  - **Locate this area far from toilets, TVs, hand dryers, or other loud infrastructure**
  - Where separation isn’t possible, enclose the space and use sound-dampening features
  - Ensure the space is **private**, not visible from public areas or through glass
  - Comfortable seating and pram-friendly layouts
  - Clear visual signage to guide use of facilities (feeding, changing, toilets)
  - Private feeding areas that are not overstimulating
- These features help reduce distress, support regulation, and create dignity and usability for families often excluded from public spaces.

**(8) What risks arise when public toilet design doesn't account for trauma or cognitive difference?**

Neglecting trauma-informed and neurodiversity-inclusive design in public spaces can lead to significant risks for both individuals and the broader community. When spaces are overstimulating, difficult to navigate, or fail to provide appropriate accommodations, neurodiverse individuals may experience meltdowns, heightened anxiety, or other expressions of distress. These are not just personal reactions—they affect public flow, staff response, and can result in delayed access for others. Rise in complex behaviours presented can lead to increased vandalism and incarceration which consequently increases expenditure across all levels of government,

Poor design can also cause individuals to avoid public spaces altogether, limiting their participation in daily activities and reinforcing social exclusion leading to less contributing members in our community. Behaviours of concern may arise not from a person's diagnosis but from an environment that is inaccessible or triggering. By not accounting for cognitive and emotional needs, public facilities risk being unsafe or unusable for a significant portion of the population. Trauma-aware, inclusive design is essential to preventing harm, ensuring equal access, and creating spaces that are genuinely welcoming for all users.

**Contribution made to this response by:**

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