

**Submission  
No 34**

## **INQUIRY INTO APARTMENT DESIGN STANDARDS**

**Organisation:** Visionary Design Development

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## PARLIAMENT OF VICTORIA INQUIRY INTO APARTMENT DESIGN STANDARDS

### Visionary Design Development responds: (via email)

#### Introduction

This document, provided by Visionary Design Development Pty Ltd, responds to the call for submissions to the Inquiry into Apartment Design Standards being undertaken by the Parliament of Victoria's Legislative Assembly Environment and Planning Committee. As built environment accessibility specialists <sup>1</sup> our contribution revolves around the importance of accessible housing environments for people with disability and older persons. Our comments are, therefore, predominantly directed at the content of the Apartment Design Guidelines for Victoria's *Section 3 – Dwelling Amenity, Guidance to accessibility*.

#### Background

People with disability comprise approximately one-fifth (17.7%, or 4.4 million, in 2018) of the Australian population plus over one-third (35.9%) of Australian households include one or more household members with disability. <sup>2</sup> The incidence of disability increases with age. <sup>3</sup> However, currently, most existing housing in Australia does not meet the diverse needs of people with disability or older persons.

Through the Disability Discrimination Act 1992's subordinate legislation, Disability (Access to Premises – Buildings) Standards 2010, accessibility requirements such as level access at pedestrian entry and throughout common areas are already in place for Class 2 and Class 3 buildings, the typical building classifications for apartment developments. Moreover, lifts are required and/or becoming increasingly common in apartment developments. Apartments are, therefore, an essential link in making housing more accessible for everyone. However, achieving accessibility to the front door of an apartment is a wasted opportunity in improving built environment utility (socially, environmentally, and economically) if the internal layout is then unusable for many people with disability and older persons.

#### Section review

Firstly it is troubling that the *Guidance to Accessibility* subsection is located at the very end of the document. Such a location reinforces the current tendency within the built environment domain to consider built environment accessibility as an afterthought, only to be considered in compliance terms. The very brief introductory page, which is inconsistent with other sections, also looks like an afterthought. The relevant Clause 55 subclause should be noted as 55.07-7 not 55.05-6. Beyond the possibility of this being a typo, ie, unintentional, it also highlights the perennial problem of publication dates and subsequent amendments to guidelines, regulations, and legislation being out of sync. The Accessibility Objective puts Clause 58 first and Clause 55 second, whereas elsewhere Clause 55 (understandably) is

<sup>1</sup> Refer last page (page 4) for details.

<sup>2</sup> <https://www.abs.gov.au/statistics/health/disability/disability-ageing-and-carers-australia-summary-findings/latest-release>

<sup>3</sup> ibid

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listed first. Consistency is a core component in the creation of accessible documents. Further, the phrase 'people with limited mobility' is also troubling in that, firstly, its narrowness is exclusionary and, secondly, people with 'limited mobility' are, invariably, users of mobility aids such as wheelchairs and walkers; the layouts provided are most certainly not wheelchair-user accessible.

Guidance layouts provided are 'business as usual' apartment designs, which are neither adaptable nor accessible. No definitions are given for 'adaptable' or 'easily altered'. It is unclear from where the stated dimensions and clearances have emanated; neither Livable Housing Design Guidelines nor Australian Standard AS 1428 Design for access and mobility are referenced for example. In focusing very narrowly on the front door, circulation to bedroom, and bathroom areas, the layouts do not take into account other accessibility, liveability, and usability issues. As drawn, layout shortcomings include: no guidance given on size of shower, no guidance given on basin accessibility, showing 4-seater tables (with all chairs pushed in) and no bookshelves nor 'ordinary life clutter', inaccessible laundry facilities, no commentary provided about kitchen design, and no mention made of level access to external space.

The layouts, as shown, are not 'adaptable'; they cannot be 'easily altered'. Due to apartment building construction constraints it is usually very, very difficult (if not impossible) to change plumbing services connections, therefore moving fixtures is very, very difficult (if not impossible) and inherently costly. There is also the added considerations of who pays for such alterations and who is responsible for apartment design that is labelled as 'accessible' but, in reality, is not fit-for-purpose.

In several of the layouts, door swings encroach on designated circulation spaces. Such conflicts may be able to be mitigated by the installation of (cavity) sliding doors. However, many of the hinged doors cannot be converted to (cavity) sliding doors as there is not sufficient length of adjacent wall to contain the required cavity. Similarly, in several layouts there is insufficient length of wall adjacent the toilet, thereby constraining the ability to fix appropriate grabrails either immediately or in the future. Layouts also show that little consideration has been given to mitigating the conflicts of positions of light switches, power points, toilet roll holders etc, and future positions of accessibility features. Latch side clearances have not been provided, thereby increasing the difficulty of opening and closing doors, particularly where the bathroom door only just clears the toilet.

We support locating the toilet in the corner of the bathroom. However, room widths that, due to the positioning of the doorway, result in insufficient wall length being available to attach toilet roll holders and grabrails in accessible positions are not satisfactory. Given that toilets commonly project over 600mm, providing a 700mm nib wall at the shower to satisfy the 'toilet in corner of room' requirement is somewhat disingenuous. This guidance will also result in not being able to attach toilet roll holders and grabrails in accessible positions.

We note that although the relevant Victorian Planning Policy Clauses, ie, Clauses 55 and 58, do not mention such a concession, subsection 3 of *Design Guidance: Interpreting the Standard* states that as long as a bevelled or rounded edge is provided, a 5mm height

difference between the step-free shower and the adjacent surface is considered satisfactory. It appears that the 5mm height allowance has been taken, out of context, from the Livable Housing Design Guidelines wherein a 5mm level difference (with bevelled or rounded edge treatment) is permitted along paths of travel, not adjacent level-access showers. Our extensive home modifications experience indicates that a 5mm height difference, even with bevelled or rounded edge treatment, can be both a mountain and a trip hazard.

It is unclear why the circulation space in front of the toilet is shown as 1.2m in some layouts but 1.0m is considered satisfactory in others. We support the requirement of a 1.2m circulation route from the 850mm clear width front door to the 850mm clear width 'accessible' bedroom door. However, the Design Option B layout (2bedroom apartment) then illustrates a narrow obstacle course from the bedroom door past the wardrobe and bedside table to the 820mm clear width bathroom door.

### **Conclusion**

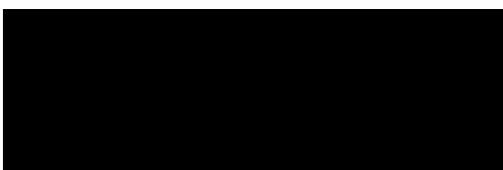
Surely guidance documents should guide toward better (best) practice rather than demonstrate how to game the system to minimum standards; the current document is called Apartment Design Guidelines, not Apartment Design Minimum Standards. As a signatory to the United Nations Convention on the Rights of Persons with Disability (UNCRPD) Australia, including its jurisdictions, is obligated to improve housing accessibility; this document is not satisfactory. Delivering more accessible apartments, better housing stock, at the outset will engender social, environmental, and economic benefits for everyone.

### **Recommendation**

We strongly recommend that:

1. the whole of *Section 3 – Dwelling Amenity, Guidance to accessibility* is thoroughly reviewed and rewritten, and
2. all guidance layouts (throughout the Apartment Design Guidelines) are revised.

We would be very pleased to contribute further to this Inquiry via appearance at a public hearing or other means.



Mary Ann Jackson, FRAIA, IAAPCPABE  
**Architect, Planner, Access Consultant**  
Director, Visionary Design Development Pty Ltd

## **Built Environment Accessibility Specialists**

Visionary Design Development Pty Ltd:

- is a transdisciplinary consultancy working at the intersection of disability inclusion and the built environment,
- is a NDIS registered provider specialising in home modifications advice,
- was involved in the Victorian Government Home Renovations Service program, and
- regularly provides access consulting advice to other built environment practitioners and policy input to government and NGOs/ NfPs.

Director, Visionary Design Development: Mary Ann Jackson

A built environment accessibility specialist with internationally recognised qualifications and/or accreditations in Access Consulting, Urban Planning, Architecture, Applied Science, and Environment, Mary Ann has 30+ years experience in built environment research, design, implementation, and assessment. Several projects have been awarded local, national and international recognition and peer-reviewed research papers published and cited in international journals. She has designed and delivered several tertiary and professional courses, seminars and workshops in design, technology, sustainability, and accessibility. Her PhD studies focus on human rights-based approaches to improving neighbourhood built environment accessibility. Mary Ann has recently been appointed to the City of Melbourne Design Review Panel as Technical Expert – Accessibility and sits on the Australian Institute of Architects' Victorian Enabling Architecture Committee. Through being a Carer to her late husband, Mary Ann has both personal and professional experience of disability issues.

Project Services Manager, Visionary Design Development: Saumya Kaushik

A registered Architect with 10+ years experience in built environment research, design, implementation and assessment, Saumya is hands-on with Visionary Design Development's Access Consulting and NDIS home modifications work. Saumya has also recently completed her Masters of International Development Practice thesis on enablers and barriers to design of accessible and inclusive sanitary facilities for diverse Sexual Orientation Gender Identity/Expression Sex Characteristics (SOGIESC) with disability. Saumya also collaboratively contributes to research publications and has lived experience of hearing impairment.