Specialist Disability Accommodation Alliance

Submission: SDA Design Standard Review Discussion Paper

December 2025

Table of Contents

Overview 3
Detailed design requirements 4
Life safety and fire safety measures 7
Regulatory alignment + interdependencies 9
Participant-centred design 10
Innovative design + building specifications 13
Environmental sustainability 15
Future-proofing SDA 16
Market and financial impacts 17
Other insights 18

1300 409 932
info @sdaalliance.org.au
Level 11, 143 Macquarie Street Sydney NSW 2000
sdaalliance.org.au

Overview

The Specialist Disability Accommodation (SDA) Alliance would like to thank the National Disability Insurance Agency (NDIA) for the opportunity to share our views relating to the SDA Design Standard Review Discussion Paper.

The SDA Alliance is a national peak body representing the best-practice SDA sector. Our members include SDA providers, institutional investors, developers, builders, financial institutions, allied health professionals and industry consultants. Our members make a significant impact on the lives of people with disability – by providing housing that is modern, innovative and designed to serve the needs of SDA residents.

With 73 members Australia-wide, as at the time of this submission, together we:

- Represent approximately $4.2 billion of total development costs for SDA projects
- Have delivered over 3375 homes with a further 890 under development
- Will provide housing to 6031 people with disability

The SDA Alliance is driven by three principles: collaboration, participant choice and control and excellence & innovation. The voices of people with disability will always guide our work and influence our strategies. By engaging with governments and other key stakeholders, we seek to improve standards and regulations and promote the provision of excellence in SDA.

Our submission focusses on the following focus areas:

- Detailed design requirements
- Life safety and fire safety measures
- Regulatory alignment and interdependencies
- Participant-centred design
- Innovative design and building specifications
- Environmental sustainability
- Future-proofing SDA
- Market and financial impacts
- Other insights

It is critical for the SDA market to have an SDA Design Standard that offers clarity on design requirements and compliance. Consideration also needs to be given to the potential impact of

1300 409 932
info @sdaalliance.org.au
Level 11, 143 Macquarie Street Sydney NSW 2000
sdaalliance.org.au

the revised SDA Design Standard including (but not limited to): clarification regarding the treatment of existing enrolled SDA dwellings and how the Standard will be applied to the future re-enrolment of SDA dwelling at year 20. Such clarity will strengthen the market, increase provider confidence and ensure participants have access to high quality SDA.

Detailed design requirements

What adjustments could be implemented in the future to enhance these outcomes? Are the requirements clearly described? What additional clarity or detailed guidance is required in the SDA Design Standard? For example, for on-site overnight assistance (OOA) spaces, Robust housing, private and common open spaces?

The SDA Design Standard needs to offer clear, unambiguous guidance on design requirements and compliance, while also being appropriately flexible so the SDA market can create dwellings which support participant needs and promote choice and control.

Robust design category

SDA residents living in Robust homes are arguably the most diverse of all the design categories. At present, the Robust category attempts to cover a diverse cohort of participants with different needs (this includes participants with different behavioural profiles, environmental triggers, sensory needs, and safety considerations).

Given the diversity among participants which exist in this category, homes need to be customisable to meet their individual needs and circumstances. While key elements of the home should remain as standardized, personal requirements for each participant should be addressed through customisation. The SDA Design Standard needs to be sufficiently flexible to support diverse participant needs in the Robust design category; the current SDA Design Standard does not provide this flexibility.

Ultimately, Robust homes must prioritise safety (reducing risk for residents and staff), offer a 'home like' environment and utilise resilient building materials and high-level physical access provisions to minimise maintenance and repairs.

1300 409 932
info @sdaalliance.org.au
Level 11, 143 Macquarie Street Sydney NSW 2000
sdaalliance.org.au

The SDA Alliance recommends:

- New sub-categories of Robust are developed with appropriate SDA funding associated with each of these specific categories to ensure participant needs are supported and cost recovery processes are in place for bespoke designs.
- The SDA Design Standard outlines specific requirements regarding construction materials used for Robust homes (e.g., wall lining materials, removable shower hoses, door jambs, doors) and other specific design requirements (e.g., external door for OOA to provide direct street access for carers; separate living areas for participants in the context of shared housing).
- The NDIA conduct out of cycle price reviews (SDA Pricing Review and/or SDA Limited Cost Assumption Review) specifically for Robust homes to address the undersupply of these homes for people with disability.

Onsite Overnight Assistance

Minimum dimensions, inclusions, and locations for Onsite Overnight Assistance (OOA) is currently not defined: this can result in a lack of clarity and reduced quality in the provision of OOA in different settings. Further, OOA rules and pricing can hinder flexibility and innovation; in some cases, there has been inconsistency in determining if properties can be enrolled with OOA.

The SDA Alliance recommends:

- OOA requirements for enrolment are clearly defined and the OOA allows for appropriate amenities for staff (e.g., bathroom) to ensure participant amenities are not utilised by staff.
- OOA rules are amended to allow a single OOA to serve (and be funded for) multiple dwellings in house/villa cluster settings. (Currently this arrangement only exists for apartment clusters.)

Should some flexibility within the SDA Design Standard be considered to enable certification of SDA dwellings that vary from minimum requirements? In what circumstances might flexibility be needed and what would this look like (for example, performance solutions)? Are any adjustments required to the design requirements for each design category to better meet participant needs?

1300 409 932
info @sdaalliance.org.au
Level 11, 143 Macquarie Street Sydney NSW 2000
sdaalliance.org.au

Variation/innovation pathway

Flexibility within the SDA Design Standard is important to address participant needs which depart from the SDA Design Standard (e.g., when co-designing purpose-built homes for participants, supporting bariatric participants, responding to the needs of individuals from diverse cultural backgrounds).

Currently, the SDA Design Standard does not offer a mechanism to undertake a variation, which can hinder the delivery of high-quality homes tailored to meet the individual needs of people with disability. A variation/innovation pathway which approves variation requests to the SDA Design Standard would offer a rigorous approach to ensuring SDA dwellings comply with building codes and regulations while supporting the delivery of high-quality homes that meet individual needs and innovation across the SDA market.

The SDA Alliance recommends the NDIA establish a mechanism/process for exemptions which allows for variations to the SDA Design Standard across all design categories: this would enable SDA providers to seek advice and deliver proposals/receive approval for person centric changes and innovative design types.

Establishing a mechanism/process for exemptions which allows for variations to the SDA Design Standard would:

- Ensure rigorous compliance with building codes and regulations
- Support innovation
- Allow industry experts to undertake reviews, bringing rigour and consistency to the process
- Deliver quality, safe housing that meets individual participants needs and supports choice and control

Governance of the SDA Design Standard

Governance of the SDA Design Standard (including binding interpretive decisions) appear to be missing which impacts timing, costs and building quality across the SDA market.

1300 409 932
info @sdaalliance.org.au
Level 11, 143 Macquarie Street Sydney NSW 2000
sdaalliance.org.au

The SDA Alliance recommends:

- Establishing a central authoritative body which oversees the ongoing evolution and application of the SDA Design Standard and efficiently approves variations on a case-by-case basis following industry consultation.
- Developing best practice guides as a supplementary resource to the SDA Design Standard (so updates can be made to the best practice guides without necessitating a review of the SDA Design Standard).

Life safety and fire safety measures

How well does the SDA Design Standard, including Appendix A best practice recommendations, address life safety (e.g., uninterrupted power) and fire safety (e.g., fire sprinklers) measures for participants, including during emergencies? Are there any areas within the life safety and fire safety measures in the SDA Design Standard that could be changed to improve participant safety?

Home fire sprinklers

Home fire sprinklers are currently not mandated in SDA, which poses an unacceptable risk to participant safety. SDA properties will typically be National Construction Building Code Class 1a, 1b, Class 2 or Class 3[1]. The National Construction Code requirements for Classes 1a and 1b do not address the critical fire safety needs of SDA residents. Adding to this are the differences in state and territory jurisdictional regulations, both for the building and for the competent practitioners who design, install, test and commission home sprinkler systems.

The SDA Alliance recommends that home fire sprinklers and interconnected smoke alarms are mandated for all SDA properties, with fire sprinkler systems being proportional to the dwelling size and fire risk.

[1] *Understanding the National Construction Code Building Classifications*, Australian Building Codes Board – available here.

1300 409 932
info @sdaalliance.org.au
Level 11, 143 Macquarie Street Sydney NSW 2000
sdaalliance.org.au

Home fire sprinklers are a reliable, cost-effective, and environmentally-sound solution:

- Home fire sprinklers not only put out fires, but create a significantly higher probability of survival, extending the time all occupants have to safely escape – this is critical because a person living in SDA may require more time and assistance to evacuate a building.
- Home sprinkler systems are far cheaper than the systems installed in commercial buildings. The cost of installing a home sprinkler system into most new Class 1 dwellings is typically below $5,000, depending on the size of the dwelling, the water supply and how many sprinkler heads are installed. Several options are available on the market: for example, the FPAA101D system – a Deemed-to-Satisfy solution referenced in the National Construction Code for mandatory fire sprinklers in identified Class 2 and Class 3 buildings – offers a safe, reliable, cost-effective and fit-for-purpose solution. The 2018 Australian Building Codes Board Regulatory Impact Statement calculated that installing FPAA101D rather than an AS 2118 system would save approximately $100,000 in construction and maintenance costs per typical mid-rise apartment building.
- While smoke alarms are mandatory in every home, they can only detect and warn of a fire, not suppress or control it. Home fire sprinklers detect the fire and automatically activate to suppress, control and potentially extinguish it, saving lives, injuries and property loss.
- Retrofitting automatic fire sprinklers to apartments is not currently required, while incorporating them into new developments where home fire sprinklers are not currently required would need negotiation on infrastructure and government service delivery to achieve the most cost-effective and sustainable improvement in community fire safety.
- Sprinkler mishaps (such as leaks) are generally less likely and less severe than home plumbing system problems: there's only a 1 in 16 million chance they'll discharge accidentally, and all key stakeholders strongly recommend the use of concealed head fire sprinklers in residential settings.
- Home fire sprinklers are effective in minimising the environmental impact of building fires as outlined below:
    - Automatic fire sprinklers control the spread of fire significantly, reducing its size and resultant damage (up to 97% reduction).
    - Reducing the size and amount of combustible material consumed by the fire subsequently reduces the carbons and toxic gases released (by 97.8%).
    - Firefighter intervention in a sprinkler-controlled fire requires much less water resulting in a fraction of the waste water (up to 91% less total water used).
    - Smaller fires result in less disposal of damaged material and less reconstruction, consuming less carbon overall.

1300 409 932
info @sdaalliance.org.au
Level 11, 143 Macquarie Street Sydney NSW 2000
sdaalliance.org.au

Uninterruptable power supply (UPS)

Current SDA Design Standard requirements for uninterruptable power supply (UPS) are unclear in their intent and lacking in detail with regards to design, operation and maintenance.

The SDA Alliance recommends the SDA Design Standard offer clear guidance and clarity regarding the intent of including UPS and UPS specifications including capacity, time to activate and an appropriate maintenance regime.

Regulatory alignment + interdependencies

What challenges or misalignments, if any, arise when navigating between the SDA Design Standard and other related government regulations during the design and construction of SDA? What suggestions or solutions might help the SDA Design Standard align with other related government regulations?

SDA operates in a complex, multi-regulatory environment which includes Commonwealth, State and Territory legislation including jurisdictionally-based tenancy legislation.

Significantly, the classification of buildings under the National Construction Code is problematic for SDA: there is a lack of alignment between the SDA Design Standard, state and territory regulations, local government planning requirements, building certifiers and the National Construction Code. This is problematic for the sector for the following reasons:

- Lack of clarity and consistency: As SDA is not explicitly mentioned in the National Construction Code, the application of the National Construction Code (by certifiers and regulators) varies from project to project. This lack of clarity and consistency in the application of the National Construction Code creates uncertainty, risk and increased cost for SDA developers and investors.
- Design features that are in opposition to creating 'home-like' dwellings: Our experience shows that certifiers are increasingly requiring compliance with building Class 3: this building class includes many institutional elements that are inappropriate in modern SDA (which typically caters for 1-3 residents). For example, Class 3 buildings have specific requirements necessitating the inclusion of emergency exit signs such as the green running man; fire systems that are more

1300 409 932
info @sdaalliance.org.au
Level 11, 143 Macquarie Street Sydney NSW 2000
sdaalliance.org.au

suitable for a commercial or industrial building than a residential dwelling; access requirements that are appropriate for public spaces (e.g., blue and yellow painted accessible parking spaces). Further, Class 3 buildings can incur significantly higher construction costs (e.g., in excess of $100,000 for a three-resident house).

- Safety risks for people with disability: While Class 3 buildings are arguably overengineered, Class 1a and Class 1b are potentially under engineered. As stated in the Life safety and fire measures section, the National Construction Code requirements for Classes 1a and 1b do not address the critical fire safety needs of SDA residents. Adding to this are the differences in state and territory jurisdictional regulations, both for the building and for the competent practitioners who design, install, test and commission home sprinkler systems.

The SDA Alliance recommends the following:

- The SDA Design Standard offers clear and specific guidance on the design, construction and features that SDA dwellings must possess to reduce the potential for incorrect interpretation (eradicating subjective judgments during the certification process).
- The National Construction Code is reviewed to incorporate clear requirements for SDA dwellings to minimise the risk of misinterpretation. Clarification of SDA dwelling classes could also reduce the cost of delivering SDA homes, as well as removing unnecessary institutional features.
- The SDA Design Standard offer explicit guidance on the design features that SDA dwellings must possess ensuring that features are conducive to 'home like' dwellings and a cost-effective approach is adopted to the development of SDA leading to Scheme sustainability.
- Home fire sprinklers and interconnected smoke alarms are mandated for all SDA properties, with fire sprinkler systems being proportional to the dwelling size and fire risk (as recommended in the Life safety and fire measures section).

Participant-centred design

How effectively does the current SDA Design Standard allow SDA dwellings to be tailored to the diversity of individual disability related needs, preferences, cultural background and lifestyles of SDA participants? How does the current SDA Design Standard limit participant-centred design?

1300 409 932
info @sdaalliance.org.au
Level 11, 143 Macquarie Street Sydney NSW 2000
sdaalliance.org.au

The current SDA Design Standard limits the ability for dwellings to be tailored to meet individual participant needs. Promoting participant-centred design leads to the development of quality SDA and maximises participant safety – the SDA Design Standard must support this process.

A contemporary SDA home needs to be capable of evolving with the needs of its current or future tenants. A key approach to achieving enabling environments is to apply the principles of universal design – as this means designing a house to meet the changing needs of occupants across their lifetime.

The SDA Design Standard can limit participant-centred design in the following ways:

- The SDA Design Standard does not currently have an official process to request variations, and this plays a role in limiting participant-centred design (as discussed in the Detailed design requirements section).
- A lack of flexibility to customise to participants needs can result in a 'cookie-cutter' approach to housing leading to over-supply in some areas, and participant needs remaining unaddressed.
- A lack of flexibility on apartment dimensions: metropolitan SDA can be hindered by inflexible spatial rules.
- Lack of suitable accommodation for informal supports (for example a single occupancy home with one bedroom lacks sufficient space for informal supports).

The SDA Alliance maintains that a best practice approach to participant engagement in the design and build process includes, where possible, promoting a custom process which integrates design collaboration with the participant (and guardian/family) from conception to completion. In the event a participant has not been identified ahead of the design and build process, customisations ought to be performed (to the extent it is possible to do so) which meet the needs of each new SDA participant.

To what extent do the SDA design requirements facilitate or act as a barrier to a participant choosing different models of care support to be delivered in their home?

The current SDA Design Standard presents some challenges to participants choosing different care support models:

- The SDA Design Standard must facilitate and reflect contemporary approaches to housing and support provision.

1300 409 932
info @sdaalliance.org.au
Level 11, 143 Macquarie Street Sydney NSW 2000
sdaalliance.org.au

- The SDA Design Standard does not currently permit design modifications that reflect family structures or communal living preferences: this can drive people into support arrangements that are unsuitable or will not meet their needs in the future.
- Fixed design elements provide limited adaptability for changing needs and make it difficult to transition between support models without costly retrofits – this is particularly relevant when supporting individuals to age in place.
- OOA considerations:
    - Currently, a single OOA can only serve multiple apartments, but not multiple dwellings in house/villa cluster settings. This can limit a participant's ability to select support models, particularly onsite shared support.
    - Funding for only one OOA per house/villa limits the possibility for multiple care teams operating together in a house if participants have their own care teams.
    - Shared OOA in house/villa clusters may also allow for better design and participant amenity (such as a study or guest room).

Dwelling design: how it can support service delivery

The SDA Alliance believes that dwelling design and the built environment can play a significant role in enabling service providers to deliver simultaneous services to a tenant. Our Best Practice Guide: Specialist Disability Accommodation offers examples of design features which can support the cost-effective and safe delivery of multiple (simultaneous) services – some of these are listed below:

- Each tenant has their own spacious bedroom with a private ensuite, allowing personal care providers to deliver services directly in the resident's private space. This is imperative for maintaining dignity and comfort, especially for residents requiring intensive personal care.
- Where appropriate, a centralised automation system which can be controlled through an App on personal devices that allows residents and service providers to manage various aspects of the home (e.g., lighting, climate control and security).
- Spacious open living areas, where possible, which offer space for multiple support providers to work simultaneously without crowding.
- Open living spaces that are multi-functional and can be easily reconfigured to accommodate different activities and services (e.g., a quiet area for relaxation, a private meeting space for consultations).
- Where possible (e.g., a house with three residents) a second living room that offers tenants a private retreat when needed, ensuring personal space even when multiple providers are present in the main living areas.

1300 409 932
info @sdaalliance.org.au
Level 11, 143 Macquarie Street Sydney NSW 2000
sdaalliance.org.au

- Safety systems that allow tenants to alert staff when feeling unsafe or when an incident has occurred in their home.
- Dedicated onsite overnight assistance space where required (with electronic communications systems direct to tenants): this allows for different support providers to deliver different aspects of an individual's supports and enhances privacy for tenants.

Innovative design + building specifications

To what extent should the SDA Design Standard incorporate innovative design and building specifications, such as smart home automation and assistive technology? How can assistive technology be incorporated into an SDA home to enable more effective delivery of in-home supports? What factors, such as cost-effectiveness, should be considered?

Supporting innovation in SDA is paramount: to achieve this, the SDA Design Standard must be flexible, clear and forward thinking. Consistent and clear updates to the SDA Design Standard would be beneficial to ensure it continues to support innovation.

Sustainable design innovation could be triggered by the NDIA incentivising SDA providers who build above minimum standards (namely beyond the requirements of the SDA Design Standard).

Smart home assistive technology

Smart home assistive technology can support benefits including extended independent living, safety and security, physical and mental activity and healthcare monitoring.[2] A key approach to achieving enabling environments is to apply the principles of universal design. Examples of universally designed products include text-to-speech functions built into cell phones or motion-controlled doors.[3]

[2] The role of smart home assistive technologies in supporting ageing in place and disability housing, Australian Housing and Urban Research Institute

[3] Global Report on Assistive Technology, World Health Organisation and UNICEF

1300 409 932
info @sdaalliance.org.au
Level 11, 143 Macquarie Street Sydney NSW 2000
sdaalliance.org.au

Assistive technology requirements as outlined in the SDA Design Standard have become outdated and can hinder innovative design solutions. Greater flexibility in the SDA Design Standard which allow the market to keep up with innovations would enable SDA participants to benefit from the available technologies.

Several issues need to be considered:

- Smart home assistive technology should be made available across all design categories.
- All SDA homes should be built to enable future smart home assistive technology additions and modifications customised to individual needs.
- Adopted technologies need to be customised to each participant (given individual needs vary significantly) to achieve optimal outcomes for people with disability and to maximise utilisation.
- Appropriate funding to cover the cost of incorporating smart home assistive technology into SDA dwellings needs to be made available: this will support innovations that would improve the lives of people living with disability.
- Streamlined and swift smart home assistive technology approval processes need to be in place to support seamless customisation for participants post occupancy. When there is a requirement for a variation, funding reallocation or review, this should be done quickly to avoid risk for the participant (losing their housing allocation) and risk for the SDA provider (losing their tenant).
- The SDA market needs to keep pace with technology and innovations that are rapidly changing in smart home assistive technology; the SDA Design Standard needs to be sufficiently flexible so the market can keep pace with technology advancements.

The SDA Alliance recommends the following:

- The SDA Design Standard provisions for smart home assistive technology (allowing customisations to be participant-led) and appropriate assistive technology funding is made available for participants requiring such provisions.
- The NDIA establish a mechanism/process for exemptions which allows for variations to the SDA Design Standard across all design categories: this would enable SDA providers to seek advice and deliver proposals/receive approval for person centric changes and innovative design types (as recommended in the Detailed design requirements section above).

1300 409 932
info @sdaalliance.org.au
Level 11, 143 Macquarie Street Sydney NSW 2000
sdaalliance.org.au

Environmental sustainability

How should the SDA Design Standard incorporate requirements to better support environmental sustainability and energy-efficient measures, such as source and storage of renewable energy? Are there any considerations regarding balancing environmental outcomes with participant outcomes, safety and affordability?

A focus on environmental sustainability and energy efficient measures can lead to cost savings for participants and a positive impact on the environment.

'Passive design' works with the local climate to maintain a comfortable temperature in the home. Good passive design should reduce or eliminate the need for additional heating or cooling depending on the home's location. A passively designed home can deliver thermal comfort, low energy bills, and low greenhouse gas emissions[4].

Good passive solar design drastically reduces heating and cooling costs, which account for 40% per cent of the energy costs in a home. Glazed windows and doors have a significant effect on a home's thermal performance – up to 40% of a home's heating energy can be lost and up to 87% gained through glazing[5].

A best practice approach to the delivery of quality SDA includes adopting, where possible, environmentally sustainable and energy-efficient measures (e.g., solar panels + solar battery to store the extra energy generated by solar panels, glazed windows, passive cooling and heating among other measures). Exploring technologies such as solar battery technology to meet UPS requirements - ensuring solutions offer total safety for participants – could also offer significant advantages to participants and the Scheme.

The SDA Alliance recommends:

- All new build SDA must meet the minimum energy efficiency requirements as outlined in the National Construction Code (NCC 2022 which requires that new homes achieve the equivalent of 7-stars [out of 10] for NatHERS thermal performance.)
- Examples of environmental sustainability measures be included in the 'best practice' section of the new SDA Design Standard.

4 Australian Government, Your Home, Passive Design
5 Australian Government, Your Home, Passive Design

1300 409 932
info @sdaalliance.org.au
Level 11, 143 Macquarie Street Sydney NSW 2000
sdaalliance.org.au

Future-proofing SDA

Are there any challenges with refurbishing existing SDA to meet the requirements of the current SDA Design Standard? What could be included in the SDA Design Standard that would reduce the cost and complexity of modifying or retrofitting features in certified dwellings post construction?

Over the course of a lifetime, the needs of people with disability will evolve - needs may change due to health, aging or life stage. The SDA Design Standard needs to remain appropriately flexible – while offering clear, unambiguous guidance - to ensure dwellings can be modified so they offer safety, dignity and confidence to SDA residents. Further, the SDA Design Standard should allow residents the option of aging in place – this supports a person's choice and control, reduces disruption, and allows them to remain connected to their community and home.

The following adjustments to the SDA Design Standard could assist in reducing the cost and complexity of modifying or retrofitting features in certified dwellings post construction:

- Clear guidance on minimum room sizes, including bathrooms, that allow adequate space for future modifications
- Ensuring step-free entries for all SDA homes which offer seamless, stair-free access at doorways
- Clear, nationally consistent provisions for:
    - structural readiness (hoist pathways, reinforced ceilings, wall backing at key locations, accessible electrical board layouts, allowance for future assistive technology mounting)
    - wet-area adaptability (plumbing layouts that can accommodate bidets or alternate toilet systems)
    - future cabling access
    - flexible kitchen and laundry layouts (modular cabinetry allowing adjustment for wheelchair users, bench systems that can be raised/lowered or reconfigured)
- An efficient approval process for modifications which does not require the dwelling to undergo a re-certification or enrolment modification. Grandfathering the specifications of dwellings once certified (to take into account when it was built and in accordance with which Design Standard itineration), will support long-term occupancy and ensure participants can age in place with minimal disruption.

1300 409 932
info @sdaalliance.org.au
Level 11, 143 Macquarie Street Sydney NSW 2000
sdaalliance.org.au

The SDA Alliance recommends the SDA Design Standard includes a clear framework regarding modifying/retrofitting features in certified dwellings post construction and a streamlined modification approval process which ensures participant needs are met within an appropriate timeframe.

Market and financial impacts

What market, or financial opportunities or challenges arise from the implementation of the SDA Design Standard? How might these affect participants, providers, investors and the broader SDA ecosystem?

The SDA Alliance maintains that all changes to the SDA Design Standard resulting from this Review must benefit and protect SDA participants, improve Scheme efficiency and offer both SDA providers and investors clarity and certainty.

It is important to note:

- While we accept, and expect, that the SDA Design Standard Review will result in change, the review process has to be well communicated to the market and enable ample consultation such to avoid unnecessary nervousness or uncertainty.
- If the revised SDA Design Standard allows villa OOA funding to be shared across a cluster (rather than one each) this will likely result in Supported Independent Living (SIL) rostering efficiency and a potential reduction to necessary villa footprints and more flexibility in design.
- Limiting the density of SDA (participants per dwelling, dwelling per project, excluding inherently dense typologies – as discussed in the Other insights section below) is not considered to have a counter economic impact to development cost nor operational efficiency; rather, it will result in increased community interaction, accessibility of informal supports, health and wellbeing benefits, macro-economic benefits and Scheme sustainability.

The SDA Alliance recommends that the SDA Pricing Review (anticipated to take place in 2028) and/or the future SDA Limited Cost Assumption Review is assessed immediately following the finalisation of the new SDA Design Standard to consider any changes to the cost of developing SDA.

1300 409 932
info @sdaalliance.org.au
Level 11, 143 Macquarie Street Sydney NSW 2000
sdaalliance.org.au

Both of these aforementioned mechanisms (which are established and well understood processes) are adequate to account for changes to the cost of SDA. As much as possible we wish to avoid uncertainty and ensure foreseeable market operation.

The most important outcome of the SDA Design Standard Review is the removal of ambiguity and ensuring more certainty for all stakeholders within the SDA ecosystem. This should include:

- Clarification of the treatment of existing enrolled SDA dwellings in respect of the application of the revised SDA Design Standard
- How the SDA Design Standard will be applied to the future re-enrolment of SDA dwellings at year 20

This will give SDA providers, investors and most importantly participants, long term confidence and certainty.

Other insights

Outlined below are additional issues applicable to the SDA Design Standard that are not covered in the focus areas or related questions.

Density, congregation and segregation

In line with Disability Royal Commission (DRC) and NDIS Review findings regarding the potential risks and impact of segregated housing and congregate accommodation, the density of SDA should be addressed by the SDA Design Standard.

The SDA Alliance recommends the following:

Apartments

- The total portion of SDA apartments within an apartment complex shall not exceed 10 tenants or 15% of the total apartment complex.
- The number of SDA apartments per storey are spread evenly across all levels of an apartment building.

Houses/villas

- A maximum number of 10 participants on one cluster/project ought to be introduced. (A cluster/project is defined as collocated SDA, unbroken by other housing, on one or more titles.)

1300 409 932
info @sdaalliance.org.au
Level 11, 143 Macquarie Street Sydney NSW 2000
sdaalliance.org.au

- In instances where the upper limit is exceeded, the project should enable mixed-tenure, community-embedded, choice-driven housing options (i.e., salt and pepper with non-SDA residents).
- Group homes (housing four, five or more participants) should not be enrollable in the future.

Enrolment delineation

Clarity and consistency regarding dwelling enrolment processes and requirements is needed to ensure all SDA dwellings comply with the SDA Design Standard (e.g., if a dwelling receives SDA Design certification and the dwelling complies with said certification that enrolment will subsequently be approved).

SDA Design Standard Review Process

Stakeholders should have the opportunity to review and provide comment on the newly drafted SDA Design Standard (prior to finalisation).

1300 409 932
info @sdaalliance.org.au
Level 11, 143 Macquarie Street Sydney NSW 2000
sdaalliance.org.au

SDA Alliance

1300 409 932
info@sdaalliance.org.au
Level 11, 143 Macquarie Street Sydney NSW 2000
sdaalliance.org.au

1300 409 932
info @sdaalliance.org.au
Level 11, 143 Macquarie Street Sydney NSW 2000
sdaalliance.org.au