



level 3 / 1 booth street
annandale nsw 2038
p 61 2 9557 6466
f 61 2 9557 6477
mail@kennedyassociates.com.au
www.kennedyassociates.com.au
Nominated Architect Steve Kennedy Registration Number 5828

27 April 2022

**Re: Proposed Specialist Disability Accommodation at
31A Richmond St, Casino**

This report outlines the design background behind the proposed Specialist Disability Accommodation to be constructed on the above site.

The term Specialist Disability Accommodation (SDA) refers to a specific type of accommodation that is funded by the National Disability Insurance Scheme (NDIS). This accommodation is only available to a very small percentage (approx. 5%) of NDIS participants that experience ‘extreme functional impairment or very high support needs’ and who’s housing needs are not anticipated to be able to be met by other housing options. The housing needs for the vast majority of NDIS participants are otherwise met by existing housing models that are already in existence separately to the NDIS.

The provision of SDA is specific to the provision of accommodation services only and is separate to the various other support services that are provided to NDIS participants under the umbrella of Supported Independent Living (SIL). SIL covers a wide range of daily living assistance that is available to all NDIS participants. In some cases SIL is provided on a 24hr basis. Organizations that provide SDA are generally separate from organizations that provide SIL.

NDIS participants that are eligible for SDA receive different levels of funding depending on their level of specific need, and their specific accommodation preferences. SDA participants must then source accommodation in the market place that matches their level of funding. It is important to note that funding for both SDA & SIL is paid directly to the NDIS participant and that providers of SDA & SIL are operating in a competitive market place. Operators of SDA & SIL are many and varied in nature with a mixture of ‘not for profit’, ‘community housing’ and ‘for profit’ providers.

The provision of SDA is part of a highly regulated system that requires the production of designs that meet the requirements of a specific Design Standard published by the NDIS. These designs must also have been certified as being compliant at design and at construction stage by an accredited SDA consultant. Operators of SDA must also be registered and they need to abide by rules established by the NDIS for the operation of the housing. These requirements sit aside town planning and National Construction Code compliance that would otherwise apply to this type of housing. The attached plans indicate in coloured overlays some of the spatial requirements that are specific to compliance with the various codes that apply to this housing.

SDA can be built to the following four specific design categories:

Improved Liveability	- Housing that has been designed to improve ‘Liveability’ by incorporating a reasonable level of physical access and enhanced provision for people with sensory, intellectual or cognitive impairment.
Fully Accessible	- Housing that has been designed to incorporate a high level of physical access provision for people with significant physical impairment.
High Physical Support	- Housing that has been designed to incorporate a high level of physical access provision for people with significant physical impairment and requiring very high levels of support.
Robust	- Housing that has been designed to incorporate a reasonable level of physical access provision and be very resilient, reducing the likelihood of reactive maintenance and reducing the risk to the participant and the community.

SDA can be built in the following housing types noting that the housing types defined by the NDIS to describe different SDA accommodation types are separate to, and not aligned with, definitions relevant to town planning controls:

- (i) Apartment, 1 bedroom, 1 resident
- (ii) Apartment, 2 bedrooms, 1 resident
- (iii) Apartment, 2 bedrooms, 2 residents

- (iv) Apartment, 3 bedrooms, 2 residents
- (v) Villa/duplex/townhouse, 1 resident
- (vi) Villa/duplex/townhouse, 2 residents
- (vii) Villa/duplex/townhouse, 3 residents
- (viii) House, 2 residents
- (ix) House, 3 residents
- (x) Group Home, 4 residents
- (xi) Group Home, 5 residents

The funding that is available for SDA varies considerably according to the design category, the accommodation type, and the location within the state. There is no guarantee that a building constructed as SDA will be able to attract the necessary SDA participants and vacancy risk is a considerable factor. It is incumbent on the SDA provider to undertake their own assessment of the most suitable accommodation to build in a particular location.

A consistent trend in the development of SDA has been a desire from participants to live more independently than was on offer from the previous group home accommodation that existed before the NDIS came into existence. These earlier group homes frequently consisted of five bedrooms with all living spaces and utilities shared equally amongst residents and supported by an office area to support staff generally on a 24hr basis. A defining characteristic of housing constructed for the NDIS has been a move towards smaller residential groupings of say 2 – 3 residents that are somewhat more independent but that also retain access to the 24hr staff support of the pre-NDIS housing.

The proposed development of SDA on the subject site comprises two separate 'group homes' built across two separate lots as follows:

Location	Town Planning Description	SDA Description
Site 1 - This house is intended for five SDA participants that currently live together in another group home are known to the SDA provider.	5 bedroom Group Home	Group Home, 4 residents plus a Villa for 1 resident
Site 2 - This house is intended for five new SDA participants that are yet to be identified and the format of the house is based upon an expectation of the preferences of new SDA participants based upon market research.	5 bedroom Group Home	House, 2 residents plus a House, 3 residents

From a town planning perspective both projects are able to be characterized as group homes as they each operate as a cohesive household unit with shared access to transport operated by staff, and shared access to a staff office space and On-Site Overnight Assistance (OOA). Residents living in this accommodation are dependent on the services provided by support staff on a daily basis.

From an SDA perspective the house on Site 1 is very indicative of other recent SDA with a shared foyer space linking the 1 + 4 bed portions of the dwelling and providing equal access to the staff areas and parking. The 1 bedroom portion of the house is somewhat independent as it has it's own kitchen, laundry and outdoor area and would suit a resident that did not seek a great degree of engagement with the other residents. The 4 bedroom portion of the house is more typical of group home accommodation with larger shared living areas but the inclusion of ensuites to improve the amenity of residents. The kitchen and laundry are large to allow space for staff to provide assistance.

From an SDA perspective the house on Site 2 is reflective of the preferences expressed by NDIS participants for accommodation that provides smaller groupings of residents and also the impact of the available SDA funding that favours the provision of a House (2 or 3 residents) over a Villa (2 or 3 residents) in this particular region. The design retains amenity of the larger living areas and ensuites on offer for the house on Site 1.

The proposed housing solutions that have been developed for these sites is highly specialized in nature and will be well suited to the complex needs of the intended residents.

Regards,

Kennedy Associates Architects



Anthony Nolan