Summer Foundation

Submission to the SDA Design Standard Review 2025-26 (Edition 2.0)

For 19 December 2025

Introduction

The Summer Foundation welcomes the opportunity to contribute to the National Disability Insurance Agency's (NDIA) review of the Specialist Disability Accommodation (SDA) Design Standard. Our submission draws on research and lived experience to provide recommendations that ensure the Standard is fit for purpose, aligned with legislation and building codes and responsive to advances in accessibility, assistive technology and sustainability.

While SDA was intended to transform housing for people with disability, it has not fully delivered on its original promise. We believe SDA design must go beyond compliance and embrace innovation. Homes should be adaptable to meet the very different needs of tenants over time. What enables independence for one person can create barriers for another, so flexibility and evidence-based design are critical. Our research has focused primarily on the High Physical Support (HPS) category, which represents the largest proportion of new builds and is expected to continue growing[1]. Accordingly, much of our feedback relates to this area. Our proposed changes focus on:

1. Accessibility enabling autonomy and reducing paid support

Accessibility should be practical, forming the basis for independent living. When benches, sinks and storage are reachable and entries are step-free, participants can undertake daily tasks with reduced reliance on support workers. Conversely, inaccessible features or manual workarounds, like crank handles on benches, create frustration, increase injury risk and drive up paid support worker costs.

We disagree with the suggestion in the circulated Discussion Paper that height-adjustable benches should be considered optional based on assumptions about participant equipment. Linking design requirements to whether a person has a height-adjustable wheelchair shifts the onus onto participants and their NDIS plans and risks creating homes that fail to meet real-world needs.

Universal design principles should underpin the SDA Design Standard, particularly for the High Physical Support category. These dwellings serve people with complex and evolving needs and design features like height-adjustable benches or multiple equipment charging points are often essential for independence, safety and reducing reliance on paid support. Standards must anticipate diversity in equipment and circumstances, rather than assume uniformity or place the burden on individuals to compensate for design gaps. To translate these insights into the Minimum Design Standard:

[1] National Disability Insurance Agency [NDIA]. (2024, March 31) Quarterly Report to Disability Ministers 2023-24 Q3 https://dataresearch.ndis.gov.au/reports-and-analyses/quarterly-report-supplements

1.1 Mandate the following as baseline requirements for High Physical Support and Fully Accessible categories:

- adaptable or height-adjustable benches and sinks (not manual crank);
- pull-down or motorised overhead cupboards;
- side-opening ovens; and
- multiple seated-use power-point/control placements.

1.2 Require knee clearance under sinks and cooktops for wheelchair users, with appliance locations set by ergonomic reach ranges.

These changes align with the Review's focus on participant-centred design and detailed design requirements, ensuring SDA dwellings support independence rather than merely meeting minimum standards.

2. Space, layout and the practicalities of life

Design elements that create a sense of home and increase comfort have the power to make SDA feel like home and "something not hospital-like"[2]. When we spoke with people with disability, they told us that while living in an apartment has benefits, like being close to shops and services (*see Section 8.*), it also comes with trade-offs particularly around space and design compromises[3]. Despite this reflection, tenants we spoke to continued to note the need for space for mobility devices, medical equipment and visitors. Cramped layouts compromise privacy, social connection and emergency evacuation.

Further, people with disability living in SDA often stressed the importance of outdoor space. However, many apartments lack level access and automated doors to balconies for wheelchair users[4]. Minimum circulation clearances may pass certification yet fail in everyday use. For example, some participants said limited space made it difficult to host visitors. One person explained that a friend who uses a wheelchair couldn't enter their apartment because there wasn't enough room for two wheelchairs[5]. Previous research shows that housing design for people with disability should include features that support social and psychological wellbeing, such as space to host guests and areas for hobbies[6]. Accordingly, the Minimum Design Standard in Edition 2.0 should:

2.1 Increase minimum circulation space beyond NCC clearances to the Livable Housing Design Guidelines - Platinum Standard. This requires the family/living room to accommodate a free space of a minimum 2250mm in diameter, to enable ease of movement clear of furniture[7].

2.2 Mandate flexible open-plan layouts to enable privacy zoning and social connection.

[2] Jamwal, R., Aimers, N., D'Cruz, K., Finis, C., & Winkler, D. (2025). Innovation in accessible housing: Lived experience insights from co-design workshops. Melbourne, Australia: Summer Foundation. p. 18

[3] Oliver, S., Jamwal, R., D'Cruz, K., Jacqui, N., Winkler, D. and Douglas, J. (2025). How do people with disability and complex needs experience the built environment in apartments designed for people with disability? *Australian Occupational Therapy Journal*. https://doi.org/10.1111/1440-1630.70051. p. 6

[4] Oliver, S., Jamwal, R., D'Cruz, K., Jacqui, N., Winkler, D. and Douglas, J. (2025).

[5] Oliver, S., Jamwal, R., D'Cruz, K., Jacqui, N., Winkler, D. and Douglas, J. (2025). p. 8

[6] Wright, C. J., Colley, J., & Kendall, E. (2020). Exploring the efficacy of housing alternatives for adults with an acquired brain or spinal injury: A systematic review. Brain Impairment, 21(2), 125–153. https://doi.org/10.1017/brimp.2019.33

[7] Livable Housing Australia. (2017). Livable housing design guidelines (4th ed.). Sydney, Australia: Livable Housing Australia. Retrieved from https://universaldesignaustralia.net.au/wp-content/uploads/2017/08/lhaguidlineseditionno4-2017.pdf

2.2 Require dedicated storage solutions for assistive and medical equipment above per-adult standards.

2.3 Ensure accessible balconies and outdoor areas (in common areas) with level transitions.

These adjustments support the Review's objectives around safety, quality and efficient support delivery while recognising SDA's unique user profiles and equipment needs.

3. Smart home and assistive technology that empower

Smart features such as automated doors, blinds, lighting, climate control and voice/tactile interfaces are transformative when reliable, intuitive and backed by service support. They are alienating when they fail or are too complex. Temperature regulation, natural light and acoustic comfort are central to physical and mental health. Participants need to control glare, airflow, noise and privacy without waiting for paid support. As one lived experience contributor said to us, "if I don't have support [the windows] just stay open."[8] Our recent research found that most participants did not have the automated blind feature, leaving them reliant on support workers to adjust blinds[9]. This not only limits autonomy but also creates ongoing costs for the NDIS. To operationalise these insights, the following should be included as a base-level design requirement for all SDA in the High Physical Support category:

3.1 Integrate baseline automation for doors to the dwelling, balconies and common areas, in addition to blinds, lighting and climate control in High Physical Support dwellings. These should have centralised user-friendly control systems that provide voice and tactile options and redundancy measures to ensure functionality in the event of technology failure.

3.2 Provide for future tech upgrades such as wiring, connectivity points and device-agnostic interfaces.

3.3 Integrate assistive tech with fire-safety systems such as automated door release and visual/auditory alerts adaptable to sensory profiles which are tested for reliability during power loss and emergencies.

Clear service support protocols for outages should also be included in the associated Design Standard 2.0 Implementation Plan. These proposals address the Review's focus areas on innovative and participant-centred design, future-proofing, life-safety measures and ensuring technology enhances autonomy and resilience.

4. Driving innovation for adaptable SDA design

Innovation in SDA design is critical to meeting the diverse and evolving needs of tenants. While the current Standard focuses on minimum compliance, it must also encourage solutions that make homes more adaptable over time. What enables independence for one person can create barriers for another, so flexibility and evidence-based design are essential. A good example is an early

[8] Jamwal, R., Aimers, N., D'Cruz, K., Finis, C., & Winkler, D. (2025). p. 17

[9] Oliver, S., Jamwal, R., D'Cruz, K., Jacqui, N., Winkler, D. and Douglas, J. (2025). p. 10

innovation by the Summer Foundation in developing a flexible toilet system designed to accommodate different user needs. This low-tech solution uses removable panels to alter the position or type of toilet, with options for drop-down rails and sensor flush that can be easily installed[10]. We need more innovation with practical and cost-effective features that allow SDA to adapt without major structural changes. Edition 2.0 should explicitly promote adaptable design solutions and provide guidance for incorporating innovative elements that support independence and reduce reliance on paid support.

5. Building an evidence base for SDA design and innovation

To create homes that genuinely enable independence and reduce reliance on paid support, we need a stronger evidence base that combines qualitative insights with robust quantitative data.

There is an urgent need for detailed, measurable information on how people with disability actually use SDA in everyday life. This includes understanding which design features are most frequently used and act as enablers of independence, which features are important but are used less often and which elements create barriers or inefficiencies. For example, questions such as: *How often are adjustable benches used? How much clearance is needed for two wheelchairs in practice? How frequently do tenants use smart home features independently versus relying on support workers?* These insights cannot be captured through anecdotal evidence alone and require systematic data collection and analysis.

This data can inform design standards that reflect real-world functionality rather than assumptions. This approach would allow Edition 2.0 to prioritise features that deliver measurable outcomes in independence, usability and cost efficiency. The Implementation Plan for Edition 2.0 should include a structured research and evaluation framework that:

5.1 Establishes NDIA-led data collection on SDA usage patterns, integrating quantitative measures with qualitative feedback.

5.2 Use evidence to iteratively refine design standards and guide innovation, ensuring SDA homes remain practical, adaptable and responsive to diverse needs over time.

6. Ensuring regulatory alignment and compliance

Edition 2.0 should explicitly require adherence to relevant legislation and codes (NDIS Act, SDA Rules 2020, NCC, DDA, etc.). Some participants reported poor build quality in SDA apartments, including construction errors and ongoing difficulties getting these issues fixed. In some cases, warped floors made it impossible for wheelchair users to move around safely[11]. This is despite Clause 13 of the current Design Standards which stipulate flooring and slip resistance requirements. This highlights a serious failure to meet even basic compliance and quality standards. Further, in the ongoing technical process around the design standard review it would be useful to clarify definitions and compliance pathways to avoid conflicts between SDA-specific requirements and general building codes where these exist. These steps directly reflect the Review's objective to

[10] Summer Foundation. (n.d.). *Apartment design features* (p. 4). Summer Foundation. https://assets.summerfoundation.org.au/pdf_offload/apartment-design-features.pdf
[11] Oliver, S., Jamwal, R., D'Cruz, K., Jacqui, N., Winkler, D. and Douglas, J. (2025). p. 10

improve technical and regulatory alignment and the need for national consistency. Accordingly, we recommend that the Implementation Plan for Edition 2.0 include:

6.1 Introduction of a quality assurance mechanism to monitor build standards and rectify defects promptly, ensuring safety and usability (e.g., flooring and slip resistance compliance).

7. Information, onboarding and transition support

Moving into SDA is a major life change and people with disability often need time in their new home to understand what works best for them. Research shows that during this transition, tenants frequently identify design changes that could help them live more independently[12]. Participants also told us they want clear information before moving, particularly regarding costs, support arrangements and any restrictions such as limits on apartment modifications or choice of utility providers[13].

This underscores the importance of strong onboarding and transition support, including opportunities to experience SDA and provide feedback. Anxiety is heightened when design limitations or technology training are unclear[14]. Importantly, SDA tenants move out and SDA must be designed to meet the needs of a diverse range of tenants over time. To achieve this, a structured post-occupancy review should be conducted to assess tenants' needs and identify any adaptations or assistive technology that could enhance independence and reduce reliance on paid support. This review should be integrated into onboarding and feedback mechanisms to ensure homes remain functional and responsive over time. Accordingly, we recommend that the Implementation Plan for Edition 2.0 include:

7.1 Mandated pre-move disclosure of design adaptability/limitations, previous modifications, technology capabilities and known constraints.

7.2 A requirement that providers offer onboarding for technology use (including simple guides, troubleshooting steps and contacts) with service-support commitments for outages or failures.

7.3 Establishment of a formal feedback mechanism between housing providers and tenants to address post-occupancy issues and improve SDA quality and compliance.

7.4 Implement a post-occupancy review to identify adaptations or assistive technology that could improve independence and reduce support hours.

These measures promote participant-centered design and address market and operational impacts, ensuring tenants can make informed choices and effectively use their homes from day one.

[12] Douglas, J., Winkler, D., D'Cruz, K., Oliver, S., Liddicoat, S., Naismith, J., & Wakim, D. (2024). Being a pioneer: A qualitative study of moving into individualised housing from the perspective of adults with neurological disability. Brain Impairment, 25(1), 1–10. https://doi.org/10.1071/ib23079

[13] Oliver, S., Jamwal, R., D'Cruz, K., Jacqui, N., Winkler, D. and Douglas, J. (2025). p. 8

[14] Oliver, S., Jamwal, R., D'Cruz, K., Jacqui, N., Winkler, D. and Douglas, J. (2025).

8. Locations connecting people to community and services

Where SDA homes are built is as critical as how they are designed. Poorly located developments create a cascade of negative impacts which separate people with disability from essential services, meaningful activities and community life[15]. Conversely, literature shows that a well-designed home in a suitable location can tangibly improve outcomes for people with disability[16]. While the Design Standard 1.0 recommends well located developments and proximity to public transport and services, this has not always been implemented in practice. Too many SDA projects are delivered in peripheral, undesirable locations, limiting choice and independence[17]. We've seen examples where SDA is placed on foothills or in isolated neighbourhoods that don't support inclusion. In regional and remote areas, thin markets often drive development in the wrong places. The NDIA cannot simply publish general guidance and hope the market delivers, it must lead from the front by:

8.1 Understanding what participants actually need and where they want to live, ensuring location and the dwelling reflects real preferences and support requirements.

8.2 Mapping existing SDA supply and identifying gaps, then sharing this information transparently with the market to guide investment and planning.

Without active market stewardship, SDA risks becoming technically compliant but practically isolating. Strategic site selection is fundamental to making SDA a pathway to inclusion, not segregation.

Conclusion

Edition 2.0 represents a critical opportunity to shift SDA from a compliance-driven framework to one that delivers genuine independence, safety and inclusion. Achieving this requires more than technical adjustments, it demands a design standard that anticipates diversity, integrates assistive technology and supports cost-effective adaptability over time. Homes must be practical and future-proof, enabling tenants to live with dignity and choice while reducing reliance on paid support.

To succeed, the Standard must be backed by robust implementation measures: clear onboarding processes, structured post-occupancy reviews and mechanisms for continuous feedback and innovation. Aligning design requirements with evidence-based outcomes and regulatory consistency will ensure SDA evolves with participant needs rather than lagging behind them.

With collaboration across government, providers and people with lived experience, Edition 2.0 can set a new benchmark. Creating housing that is not only accessible but transformative, enabling people with disability to thrive in the community now and into the future.

[15] Jamwal, R., Aimers, N., D'Cruz, K., Finis, C., & Winkler, D. (2025).
[16] Kielhofner, 2002; Wright, Zeeman, & Whitty, 2017; Yong et al., 2023 *as cited in* Oliver, S., Jamwal, R., D'Cruz, K., Naismith, J., Winkler, D. and Douglas, J. (2025).
[17] ABC News. (2025, August 27). *Empty promises*. Retrieved from https://www.abc.net.au/news/2025-08-27/empty-promises/105702554

Annex 1. Comparison: SDA Design Standard vs Proposed Amendments

Current SDA Design Standard Section	**Proposed Amendments**	**Page Ref.**	**Rationale for Change**
Entry & Circulation	- Increase minimum circulation space beyond NCC for mobility devices and medical equipment - Mandate flexible open-plan layouts for privacy and social interaction - Require dedicated storage for assistive and medical equipment	Clauses 2.1–2.12, 17.1 (pp. 12–17, 67)	Current clearance meets minimums but fails in practice; cramped layouts restrict independence and emergency access. Research shows space impacts dignity and usability.
Kitchen	- Adaptable or Height-adjustable benches and sinks (not manual crank) - Pull-down or motorized overhead cupboards - Side-opening ovens and accessible appliance placement - Ensure power points and controls are positioned for seated use	Clauses 8.1–8.17 (pp. 47–53)	Adjustable ergonomic layouts reduce reliance on paid support and improve safety.
Technology & Automation	- Integrated automation for doors, blinds, lighting, and climate control - Centralized, user-friendly control systems (voice + tactile options) - Provision for future tech upgrades (wiring, connectivity points)	Clauses 4.2.8, 6.3, 21.1–21.2, 23.1–23.2 (pp. 26–29, 31, 71–73)	Tech improves autonomy but poor integration frustrates users. Research shows smart features are life-changing when reliable and intuitive. Training and ongoing tech. support services are required.

Current SDA Design Standard Section	Proposed Amendments	Page Ref.	Rationale for Change
Environmental Controls	- Automated blinds and operable windows (bedroom/living)	Clauses 6.1–6.4, 21.1–21.2 (pp. 31, 71)	Sensory comfort affects health and wellbeing; automation supports self-regulation and reduces heat stress.
Safety & Emergency Egress	- Accessible balcony and outdoor areas - Assistive tech. available to support fire safety planning.	Clauses 16.1–16.3, 24.1–24.2 (pp. 66, 73)	Current provisions meet NCC but lack SDA-specific evacuation needs; research stresses safety during emergencies for high-support users.
Co-Design & Customization	- Multiple seated-use power-point/control placements.	Clauses 12.1–12.4 (p. 62)	Standards assume uniform device recharging needs; lived experience shows a shortage.
Information & Transition Support	- Mandate pre-move disclosure of design adaptability/limitations and previous modifications - Require onboarding for technology use and maintenance protocols	Not explicitly covered → Add new section	Research highlights anxiety during transition; clear info and training reduce stress and improve outcomes.