



***Submission to the Productivity Commission's  
Housing and Homelessness Agreement Review***

***Young People In Nursing Homes National Alliance  
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## The Young People In Nursing Homes National Alliance

The Alliance is the national peak organisation for young disabled Australians with high and complex health and other support needs living in residential aged care facilities or at risk of placement there (YPINH). We support these young people to have choice about where and how they live and how they are supported.

As Australia's first national peak representing this group, the Alliance draws its membership from all stakeholder groups including young people themselves; family members and friends; disability, health and aged care service providers; various national and state peak bodies, government representatives and advocacy groups.

We encourage a partnership approach to resolution of the YPINH issue by State and Commonwealth governments; develop policy initiatives at state and federal levels that promote the dignity, well being and independence of YPINH and their active participation in their communities; and ensure that young people living in nursing homes and their families have

- A voice about where they want to live and how they want to be supported
- The capacity to participate in efforts to achieve this, and
- 'A place at the table', so they can be actively involved in the service responses needed to have "lives worth living" in the community.

As the pre-eminent national voice on this issue, the National Alliance's primary objectives are to

- Raise awareness of the plight of YPINH
- Address the systemic reforms required to resolve the YPINH issue and address the urgent need for community based accommodation and support options for young people with high and complex needs
- Work with government and non-government agencies to develop sustainable funding and organisational alternatives that deliver 'lives worth living' to young people with high and complex clinical and other support needs
- Provide on-going support to YPINH, their friends and family members.

The Alliance is currently supporting delivery of the federal government's Younger People in Residential Aged Care (YPIRAC) Strategy 2020-2025; and the Strategy's Targets that are

- No people under 65 years entering residential aged care by 2022
- No people under 45 years living in residential aged care by 2022
- No people under 65 years living in residential aged care by 2025

## Introduction

The Young People In Nursing Homes National Alliance is pleased to provide this brief submission to the Productivity Commission's Review of the National Housing and Homelessness Agreement (NHHA).

Rather than seeing housing as buildings developed in isolation from or with little reference to the spaces and communities within which they are built, this submission supports a concept of accessible housing as key to the successful development of inclusive communities.

Our work with younger disabled Australians living or at risk of placement in residential aged care, has revealed that the current offering for NDIS participants of either sharing housing and supports with others with disability (a continuation of the old, widely condemned group home model); or living on one's own in an apartment with some shared care, is too narrow to accommodate the diversity of housing need and expectation that Australians with disability have.

Responding to this diversity of need and expectation requires development of a range of housing 'options on the spectrum' that are not only visitable, accessible and adaptable, but are delivered as part of accessible precincts and inclusive communities.

While delivering housing in this way is not new and has been embraced internationally as the examples in our housing policy document reveal, it is unfortunately not common in Australia.

The advent of the NDIS promised a revolution in the way housing and support would be delivered to people with disability. However, with a poorly designed Supported Disability Accommodation (SDA) model that responds primarily to the needs of investors, the scheme's lack of stewardship of its SDA 'market' has resulted in a 'build and they will come' approach to housing development by investors ignorant of alternative options.

This approach has predominantly delivered poor and patchy housing outcomes with little if any connection to the spaces within which they have been built, let alone consideration of accessible housing as a key design element in the advancement of inclusive communities.

The next National Housing and Homelessness Agreement must therefore mandate a view of accessible housing that positions its development firmly within the purview of inclusive communities and the accessible precincts that are integral to these spaces.

## The National Housing and Homelessness Agreement

In responding to the Review's terms of reference, the Alliance believes the next National Housing and Homelessness Agreement (NHHA) must embody a conception of housing that

- Mandates accessible, adaptable and visitable features in all new builds.
- Ensures the mandatory minimum accessibility standards that are now part of the

National Building Code are accepted by all states and territories.<sup>1</sup>

- Situates the development of accessible and inclusive communities as the frame within which all housing development must be considered.
- Promotes development of housing options that respond to the varied needs and expectations of Australians with disability.
- Includes people with disability in the design and articulation of housing as part of accessible and inclusive community developments.
- Makes the Five Pillars and Twelve Principles outlined in *Creating places for people: an urban design protocol for Australian cities*<sup>2</sup> as foundational in the next NHHA.

To achieve this, the Alliance recommends the following actions.

1. *Local Government Authorities (LGAs) prioritise the development of accessible precincts and inclusive communities as part of all domestic and commercial planning approvals.*

The recent boom in apartment building has dramatically changed the shape of our cities. Yet apart from the inclusion of currently fashionable stepless showers, none of these new accommodations is accessible.

Until the mandatory minimum accessibility standards enshrined in the National Building Code are accepted by all states and territories, local government planning authorities can not only insist on...they can *require* that new accommodations are built as part of accessible and inclusive community precincts.

At a local level, the design of precinct areas can deliver community connections and a strong sense of place. Community facilities can be shared, co-located or integrated, or may be intentionally located in close proximity to an existing precinct to enable greater community access.

In its *Guide to Delivering Community Precincts*, the Victorian Department of Planning and Community Development says

*Integrated community facilities are a vital component of creating healthy communities, supporting social inclusion and enhancing the wellbeing of local residents. Communities with access to high quality social infrastructure have better access to services and more opportunities to participate in community life.*<sup>3</sup>

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<sup>1</sup> At the time of writing, WA, SA and NSW have yet to sign up to the Code's minimum accessibility requirements. See <https://www.buildingbetterhomes.org.au/> and <https://ncc.abcb.gov.au/>

<sup>2</sup> See

[https://urbandesign.org.au/content/uploads/2015/08/INFRA1219\\_MCU\\_R\\_SQUARE\\_URBAN\\_PROT\\_OCOLS\\_1111\\_WEB\\_FA2.pdf](https://urbandesign.org.au/content/uploads/2015/08/INFRA1219_MCU_R_SQUARE_URBAN_PROT_OCOLS_1111_WEB_FA2.pdf)

<sup>3</sup> Victorian Department of Planning and Community Development, *A Guide to Delivering Community Precincts*, Melbourne, 2010: 4/5.

Sydney's Five Dock mixed use development offers a case in point.<sup>4</sup> This collaboration between the local council and the landowner/developer, redeveloped an existing, single level supermarket and car park to deliver a supermarket, a neighbourhood public library, a cafe and a range of accessible apartment types all situated within an inclusive and accessible precinct.

To do this, the landowner approached the local council and began negotiations to deliver a project that stood outside the planning laws. In exchange for an increase of 30% apartment floor space, the developers gave the council one level of the building for a new library (fit-out the responsibility of the council); and allowed the council to direct the arrangement and linkage of the public spaces on the ground, along with car parking and access.

By negotiating with the developer, the council was able to deliver an excellent outcome for the broader community and provide a new public library and upgraded public spaces at a significantly reduced cost, amenities that may not have otherwise occurred.

Easy access to a wide range of shops, services and amenities, promotes a sense of independence and creates opportunities for engagement with the local and wider community. The library, supermarket and cafe bring people into the development and increase opportunities for interactions.

Finally, a network of pedestrian-friendly paths and plazas in and around the development provide residents with safe places to occupy outside their home that are easy to access, while the wide variety of apartment types encourages a diverse mix of residents and provides a range of different living options to meet different needs.

Situated as part of an accessible, inclusive precinct, the result is a mixed use development available to all the community.

## 2. *Make the Five Pillars and Twelve Principles outlined in *Creating places for people: an urban design protocol for Australian cities*<sup>5</sup> the basis of the next NHHA.*

In taking account of the unique characteristics of a location and its community, *Creating places for people* uses a number of broad principles to encourage excellence in the design and custodianship of urban places. These principles are intended for "... any project or location – whether it is in a large capital city, regional centre or rural town."<sup>6</sup>

Standing on five pillars of productivity, sustainability, liveability, leadership and design excellence, this landmark urban design Protocol is about the creation of "...productive,

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<sup>4</sup> Young People In Nursing Homes National Alliance. *Shaping the Future Today. Transforming Housing Policy for Australians with Disability. A housing policy discussion paper.* Melbourne, 2015: 10.

<sup>5</sup> See

[https://urbandesign.org.au/content/uploads/2015/08/INFRA1219\\_MCU\\_R\\_SQUARE\\_URBAN\\_PROTOCOLS\\_1111\\_WEB\\_FA2.pdf](https://urbandesign.org.au/content/uploads/2015/08/INFRA1219_MCU_R_SQUARE_URBAN_PROTOCOLS_1111_WEB_FA2.pdf)

<sup>6</sup> Op.Cit: 1.

sustainable and liveable places for people through leadership and the integration of design excellence.”<sup>7</sup>

Interrelated with the Protocol’s 5 foundation Pillars are 12 Principles based on design, leadership and governance. These include design principles about place (productivity and sustainability); design principles about people (liveability); as well as principles about leadership and governance.

While all the Principles are important parts of the whole, in the context of this submission and the next NHHA, the Alliance believes the principles concerned with creating the context for people to engage with place have particular pertinence. They also go to the heart of what the NDIS SDA market has failed so comprehensively to deliver for scheme participants.

Under the Protocol, creating a context for people to engage with place involves providing a diversity of options and experiences that includes diversity of housing options, as well as a range of facilities, services and activities. Yet all too often, SDA housing developments are undertaken in greenfield sites on the outer reaches of cities.

Based predominantly on the disregarded group home model, poor public transport infrastructure and little local amenity means younger people who have moved from residential aged care to live there, can be as isolated and alone as they were when living in an institutionalised aged care setting. Little wonder so many of these new houses are sitting empty and unwanted.

Rather than the ‘build and they will come’ approach that has driven so much of the SDA market, renowned Danish architect and urban design consultant, Jan Gehl, puts urban design and development this way:

*First life, then spaces, then buildings: the other way around never works.*<sup>8</sup>

The development of accessible housing options must be as multifaceted as the needs and expectations of the individuals who will live in these accommodations. They must also be part of a broader urban design that prioritises accessible precincts as integral to the realisation of the inclusive neighbourhoods that enable Australians with disability to live, work and play as valued and contributing members of their communities.

Making the Urban Design Protocol’s five Pillars and twelve Principles the foundation of the next NHHA, will enable this important agreement to meet governments’ obligations as they are described in the Australian Disability Strategy. In particular, it will make delivery of the Inclusive Homes and Communities Outcome Area achievable.

Identified by Australians with disability as a priority area that is key to achieving the Strategy’s vision, the latter’s stated outcome of people with disability living in inclusive,

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<sup>7</sup> Op.Cit: 7.

<sup>8</sup> Gehl, J. *Project for Public Spaces*. See <https://www.pps.org/article/jgehl>

accessible and well-designed homes and communities,<sup>9</sup> marries perfectly with the Protocol's intention of "...creating localities in which people live, engage with each other, and the physical place around them."<sup>10</sup>

As an urban design Protocol comprehensively supported by state and federal jurisdictions and a large and diverse group of professional organisations and peak bodies,<sup>11</sup> *Creating places for people* offers the framework the next NHHA must implement if the aspirations outlined in the Australian Disability Strategy's Inclusive Homes and Communities Outcome Area are to be realised.

### 3. *Because of its role as a funder of accessible housing, the NDIS must become a party to the next NHHA agreement.*

As a funder of housing (albeit indirectly via SDA subsidies), the NDIS must be recognised in the next NHHA as a key government agency contributing to the overall policy outcomes of the agreement.

The formal integration of the NDIS into this sector via the next NHHA, is vitally important. The scheme's design and operation of its SDA program should be influenced by and directly reference national housing and homelessness goals to ensure that the SDA program complements the work of other jurisdictions.

## Finally...

Rising levels of homelessness and ever lengthening social housing waiting lists are all too often the lead stories in our national mastheads. While critically important, committed government investment in the social housing market is only a part of the solution. This vital financial investment must be married with an equally critical national commitment to accessible housing as the binding design element of inclusive communities.

Undertaking the three actions described in this submission will enable the next National Housing and Homelessness Agreement to do this.

## Further contact

Dr Bronwyn Morkham  
National Director  
Young People In Nursing Homes National Alliance

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<sup>9</sup> Commonwealth of Australia (Department of Social Services), *Australian Disability Strategy 2021-2031*, Canberra 2021: 9.

<sup>10</sup> *Creating Places for People: an urban design protocol for Australian cities*. See <https://urbandesign.org.au/>

<sup>11</sup> Op.Cit. See <https://urbandesign.org.au/champions-of-the-protocol/>



## References

Australian and other governments, *Creating Places for People: an urban design protocol for Australian cities*, 2015. Available at [https://urbandesign.org.au/content/uploads/2015/08/INFRA1219\\_MCU\\_R\\_SQUARE\\_URBAN\\_PROTOCOLS\\_1111\\_WEB\\_FA2.pdf](https://urbandesign.org.au/content/uploads/2015/08/INFRA1219_MCU_R_SQUARE_URBAN_PROTOCOLS_1111_WEB_FA2.pdf)

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## Appendix

Young People In Nursing Homes National Alliance. *Shaping the Future Today. Transforming Housing Policy for Australians with Disability. A housing policy discussion paper.* Melbourne, 2015.

Attached with this submission.