



Rights & Inclusion Australia Inc.

**Mandatory fire protection
for NDIS SDA?**

15 September 2026

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15 September 2026

Senator the Hon Jenny McAllister
Hon Mark Butler MP
Minister(s) for the National Disability Insurance Scheme
Parliament House
CANBERRA ACT 2600
Dear Minister

Mandatory fire protection for NDIS SDA?

Rights & Inclusion Australia (R&IA) is a disability-led organisation whose directors bring direct lived and professional experience across architecture, access consulting and engineering.

We write to bring to your attention this report, ***Mandatory fire protection for NDIS SDA?***, and to ask that you and your office review it and take its findings seriously before any decision is made to mandate fire protection sprinklers across all Specialist Disability Accommodation.

Because of the significant financial stakes involved, the cost to participants, and the absence of evidence that a blanket mandate is likely to save a single life, R&IA asks that any change to the NCC or the SDA Design Standard be preceded by an independent public review, a regulatory impact assessment, a comprehensive cost assessment, and genuine consultation with people with disability and SDA stakeholders.

Given the timing of recent cutbacks to NDIS funding at the same time as Productivity Commission review to reduce regulatory burden on the building industry, along with changes being considered to the SDA Design Standard via the KPMG review, this is an urgent reminder to get the review process right.

We would welcome the opportunity to brief you or your office on our findings. Please contact R&IA director Michael Fox on 0417 402 030 or contact@riaustralia.org.

Yours sincerely

Michael Fox AM
R&IA director

Allan Hunter
R&IA director



Contents

Contents	2
Executive summary	3
Should sprinklers be mandatory in SDA?	4
Rights & Inclusion Australia	4
The question	4
The campaign	4
Some facts - the NCC	5
The core issue - choice, control, and the family home	6
Statistics	7
Costs	8
Other Considerations	10
Alternatives	10
Previous reviews- emergency evacuation	10
Over-regulation	11
Conflict-of-interest	11
Who's in charge of decision-making?	12
Missing	13
Conclusions	14
The last word	16



Executive summary

This report examines whether fire protection sprinklers should be made mandatory in all National Disability Insurance Scheme (NDIS) Specialist Disability Accommodation (SDA), as sought by the SDA Alliance and Home Fire Sprinkler Coalition in Australia. R&IA's position is that they should not.

Fire protection is already comprehensively addressed by the National Construction Code (NCC). SDA group homes and apartment buildings of more than four storeys are already required to have sprinklers under existing Class 3 and Class 2 provisions respectively. The fundamental question is this: should the remaining 1-, 2- and 3-bedroom “House” and “Villa, duplex and townhouse” building types – including family homes – registered as SDA under NCC Class 1a also be forced into a sprinkler mandate, at the cost of the choice and control the NDIS is built on?

The statistical case for a mandate does not withstand scrutiny. The widely quoted (and incorrect) claim that “62 % of people who died in preventable residential fires had a disability” uses an internationally standard definition of disability that includes age-related conditions such as dementia and arthritis, drawn from a study population dominated by elderly Australians – not NDIS participants, who are by design younger people and whose disability was not acquired through ageing. Read correctly, the data suggest NDIS-eligible cohorts die in preventable house fires at a small fraction of this rate, while elderly people living alone are the group actually over-represented in the underlying statistics.

The financial case does not hold up under examination. NDIS pricing already includes (for example) an allowance of around \$60,000 for sprinklers in a three-bedroom High Physical Support home, and a reclassification from NCC Class 1b to Class 3 may add around \$180,000 to a Class 1 home. These would add to the cost of SDA program, while the same time the government is trying to not just rein in, but reduce NDIS costs. With no evidence a mandate would save a single life.

The report also raises governance and transparency concerns: the push for a mandate appears to have proceeded largely without public consultation, in a manner R&IA considers inconsistent with the NDIA's legislated remit, and alongside undisclosed commercial interests among some of the building and construction lobby groups involved.

R&IA's recommendation is that fire protection sprinklers remain an important safety measure, appropriately mandated where NCC Class 2 and Class 3 already require them, but that NCC Class 1a family homes and similar SDA building types should retain the choice of whether to install them – preserving the diversity of housing options, and the choice and control, that the NDIS was designed to provide.



Should sprinklers be mandatory in SDA?

Rights & Inclusion Australia

R&IA members and directors provide extensive experience and involvement in the development and implementation of accessibility legislation and provisions in Australia and internationally through the CRPD (UN Convention on the rights of persons with disabilities) ratified by Australia in 2008.

R&IA director Michael Fox is an architect, planner and access consultant, refer www.accessaustralia.com.au and relevant experience includes

1. Initial Standards Australia ME64 / AS1428 Chair – 1980s
2. President of RI Global during CRPD drafting and adoption – 2004 to 2008
3. Accessible housing programs 2010 to 2020 with ANUHD
4. Member of ABCB NCC liveable housing committee – 2022

R&IA director Allan Hunter is a retired engineer the experience on a range of defence projects, and in roles including support, reliability, systems, and safety engineering. As well as a degree in electrical engineering, Allan Hunter holds postgraduate certificates in reliability and software engineering, and a master's in systems engineering.

Since 2021, Allan has been advocating for the NDIA to address SDA structural problems and upgrade the SDA new-build program to incorporate project management practices commensurate with a multibillion-dollar infrastructure build program. Allan is also involved in researching and developing best-practice backup power supply in disability housing, and working with a range of organisations including the Australian Rehabilitation and Assistive Technology Association (ARATA) and Adelaide University.

The question

Any fatalities due to a preventable residential fire are tragic, and fire protection sprinklers are an important part of fire prevention strategy. However, the harsh realities of budget restraint and the recent cutbacks to the NDIS need to be acknowledged.

But the campaign raises awkward questions: what are the pros and cons, who decides, and, most importantly, what process needs to be followed when deciding whether sprinklers should be mandatory in all SDA?

The campaign

The most recent high-profile element of the campaign for fire protection sprinklers is the SDA Alliance/Home Fire Sprinkler Coalition in Australia campaign on the ABC.¹

¹ <https://www.abc.net.au/news/2026-02-04/calls-for-sprinklers-in-specialist-disability-accommodation-ndis/106278364> retrieved 26 July 2026



The SDA Alliance campaign is an extension of the broader residential campaign, based on a strategy commissioned by HFSC Australia and developed by Worcester Polytechnic Institute. Documented in the 2021–2025 HFSC Australia strategy², the campaign is described in extensive detail in an article in Asia-Pacific FIRE online magazine.³

Some facts - the NCC

First, let's get one thing straight: the NDIS-funded new-build SDA program has always made provision for fire protection. Schedule 1 of the NDIS SDA legislation⁴ (Figure 1) identifies the applicable National Construction Code classifications.

Take group homes, for example. Even though Schedule 1 allows 4- and 5-bedroom SDA-registered group homes to be NCC Class 1b, in practice they are always classified as NCC Class 3 (residential care), which requires⁵

"Class 3 residential care buildings accommodating the age, children or people with disability are required to have automatic fire sprinklers"

NCC Class 3 mandates the kind of fire safety equipment you would find in a hotel, backpacker hostel, or detention centre (hence the reference to "a number of unrelated persons" in the NCC Class 3 definition). Think emergency exit lights, fire-isolated stairways and passageways, portable fire extinguishers, fire hose reel systems, monitored fire detection systems and sprinklers, along with a stack of mandatory consultants' reports.

Then there are apartments: NCC Class 2. After the 2017 fire in Grenfell Tower⁶ (72 died), Hong Kong⁷ (168 died), and the Lacrosse apartments fire (no one died, but TBA dollars in damages) in Melbourne in 2014⁸, one would have thought sprinklers would already have been mandatory. It turns out that Class 2 makes sprinklers mandatory in ALL apartment buildings of more than four storeys – not just SDA.

² **Home Fire Sprinkler Coalition Strategy 2021-2025** available from <https://homefiresprinklers.org.au/strategy-2021-2025/> retrieved 27 July 2026

³ Mark Whybro, 27 September 2022, "*The road to mandating home fires than Australia*" <https://apfmag.com/the-road-to-mandating-home-fire-sprinklers-in-australia/> retrieved 26 July 2026

⁴ National Disability Insurance Scheme (Specialist Disability Accommodation) Rules 2020 Latest version F2025C00260 C01 04 March 2025, Schedule 1, retrieved 17 May 2026

⁵ ABCB **Regulation Impact Statement for Final Decision -Fire safety in new Class 2 and Class 3 residential buildings**, November 2018, on page 8

⁶ <https://www.bbc.com/news/uk-40301289> retrieved 17 May 2026

⁷ www.nytimes.com/2026/05/04/world/asia/hong-kong-apartment-fire-investigation.html retrieved 17 May 2026

⁸ <https://theconversation.com/10-years-after-the-lacrosse-building-cladding-fire-the-defects-and-disasters-continue-237399>



A recent review by the ABCB of fire safety in Class 2 and Class 3 residential buildings⁹ gives a guide to the kind of considerations involved in the cost-benefit trade-off for this type of building.

The core issue - choice, control, and the family home

This leaves 1-, 2- and 3-bedroom “Villa, duplex and townhouse” and “House” building types, specified in Schedule 1 (Figure 1) as “Class 1a or 3” and “Class 1 or 3” respectively.

This is the core issue: should NDIS Participants be able to choose to live in (NCC Class 1a) mainstream housing, including family homes, as registered SDA?

Or should the NDIA be able to override Schedule 1 of the SDA legislation and make it mandatory for all SDA-registered homes to have compulsory fire protection sprinklers?

(b) this instrument applies in respect of that dwelling.

Schedule 1—SDA building types

Note: See the definition of *SDA building type* in section 5.

1 SDA building types

The following table sets out the building types that are SDA building types and the features and Building Code of Australia classification for each building type.

SDA building types			
Item	Building type	Features	Building Code of Australia classification
1	Apartment	The features of an apartment are: (a) it is self-contained occupying only part of a larger residential building; and (b) it is typically built above or below another dwelling. A self-contained dwelling that is separated from other dwellings by walls alone is not an apartment but is likely to be a villa, duplex or townhouse.	Class 2
2	Villa, duplex and townhouse	The features of a villa, duplex or townhouse are as follows: (a) it has 3 or less residents; (b) it is a semi-attached property within a single land title or strata titled area; (c) it is separated from other villas, duplexes or townhouses by a fire-resistant wall (not required for existing stock); (d) it has a separate and reasonably accessible entry; (e) the residents are not able to internally travel between dwellings (restricted internal access between dwellings may exist for support staff only); (f) it may be an ancillary dwelling that is located on the same parcel of land as another dwelling (e.g. a fully self-contained granny flat).	Class 1a or 3
3	House	The features of a house are as follows: (a) it is a low-rise dwelling with gardens or a courtyard; (b) it is located on a clearly separate land area (separated by, for example, a fence, hedge or other form of delineation); (c) it has no shared wall, roof, entry area, driveway, carpark or outdoor area with any other dwelling other than an ancillary villa, townhouse or duplex that has no more than one resident; (d) the parcel of land on which the house is located is proportional to the number of residents and is consistent with similar properties in the neighbourhood in which the house is located; (e) the parcel of land on which the house is located has no more than 2 ancillary villas, duplexes or townhouses	Class 1 or 3
4	Group home	A group home is distinguished from other houses by having 4 or 5 long-term residents.	Class 1b or 3

Figure 1 - Schedule 1 SDA legislation, NCC for SDA building type

It is only a small step from mandatory fire protection sprinklers in SDA, as a matter of Commonwealth public policy, to a policy where all disability homes are required to have mandatory fire protection sprinklers in an institutional-style setting.

⁹ ABCB **Regulation Impact Statement for Final Decision -Fire safety in new Class 2 and Class 3 residential buildings** , November 2018.



So much for choice and control, and for a range of built forms: any kind of government subsidy or support for people with disability living in a family home will be discouraged or outright banned. *For their own good...*

Statistics

The largest study of fatalities in preventable residential fires in Australia covered 900 fatalities between July 2003 and June 2017¹⁰ The report found there were multiple interacting factors including age, health issues, homeownership status, socio-economic status, time of year, medication and alcohol consumption, and time of day.

What the report also makes clear is that health conditions resulting in physical or mental disability – such as heart disease, dementia, or arthritis – were counted as a “disability” in line with international practice.

In other words, those individuals with “disabilities” most likely to die in a preventable residential fire are of low socio-economic status, elderly (aged over 65), living in their own, possibly poor-quality, home, and in poor health. Not NDIS participants:¹¹

“The NDIS were specifically designed to target the needs of younger people whose disability was not acquired as part of the natural process of ageing”

This difference in definitions needs to be clearly emphasised in any discussion of NDIS eligibility.

Digging deeper into the report¹² provides some evidence of actual fatality rates for two important cohorts:

1. **Lifter & pressure mattress present** – the number of fatalities where a hoist/mechanical lifter and pressure mattress were both identified is marked as “<5” (the vagueness is intentional to address privacy concerns). This suggests a fatality rate for SDA residents who rely on a lifter of around 1% – not 62%.
2. **Crutches/walking stick/walking frame** – 46 deaths were recorded among people who use these items, but most were elderly: they make up $46/365 = 12.6\%$ of fatalities for whom use (or otherwise) of assistive technology was recorded. This fatality rate is around ten times greater than for the lifter cohort above, which matches ABS statistics suggesting the elderly (aged over 65) are around ten times more likely to die in a residential fire than someone in SDA.

¹⁰ Coates, L., Kaandorp, G., Harris, J., van Leeuwen, J., Avci, A., Evans, J., George, S., Gissing, A., van den Honert, R. and Haynes, K., 2019, **Preventable residential fire fatalities: July 2003 to June 2017**, Bushfire and Natural Hazards CRC. Dated August 2019

¹¹ Sam Bennett, Mia Jessurun, and Hannah Orban, Grattan Institute, **Saving the NDIS - How to rebalance disability services to get better results**, June 2025 on page 28.

¹² Coates, L., Kaandorp, G., Harris, J., van Leeuwen, J., Avci, A., Evans, J., George, S., Gissing, A., van den Honert, R. and Haynes, K., 2019, **Preventable residential fire fatalities: July 2003 to June 2017**, Bushfire and Natural Hazards CRC. Dated August 2019



If the building industry were serious about reducing fatalities in preventable residential fires, the group to target would be the elderly living alone with health issues – eligible for the age pension, perhaps, but not the NDIS.

Instead, we have misleading claims that imply people with disability who are eligible for the NDIS are part of a risk cohort where *“nationally, 62 per cent of people who died in preventable residential fires between 2003 and 2017 had a disability.”*

1. **Misleading definition of disability** – the Report clearly states – in line with internationally accepted practice – that these statistics include age-related health issues under the definition of disability. The result is that the elderly, not eligible for the NDIS or relevant to this discussion, dominate the “disability” fatality list.¹³

“The most common disability was physical (e.g., mobility, heart disease, asthma etc.) (46.2%, n=285), followed by mental health (27.8%, n=171) and neurological (e.g., dementia) (9.7%, n=60).”

2. **Risk factor vs fatality numbers** – the SDA Alliance has confused the 61.8% figure on page 7 of the reference (*a single risk-factor variable on a list that adds up to 348%*) with the actual figure of 46.7% (n = 420) of people who died who had a disability.

Clearly, lobbyists are guilty of using exaggerated, misleading statistics, and bear some responsibility for rectifying the resulting misunderstanding.

Costs

SDA Alliance claim¹⁴’s claim that mandatory sprinklers “may” cost *“between \$5,000 to \$20,000 to fit into the homes”* does not hold up to scrutiny.

The NDIS already includes SDA payments for fire protection sprinklers of around \$60,000 in a three-bedroom home. Details are contained in the Ernst & Young NDIS 2022–23 Pricing Recommendations¹⁵, which show a capital cost of \$59,280 for a three-bedroom High Physical Support (HPS) dwelling with Onsite Overnight Assistance (OOA).

Then there are the annual inspection costs, estimated¹⁶ at *“\$800 per annum for apartments, \$2800 per annum for all other Building Types”*.

But there is a range of potential cost blow-outs. For example, finding that the mains water connection cannot provide sufficient flow rate could require a \$20,000 upgrade to the street connection, and an increase from NCC Class 1b to NCC Class 3 was found by one builder to

¹³ *ibid* on page 69.

¹⁴ <https://www.abc.net.au/news/2026-02-04/calls-for-sprinklers-in-specialist-disability-accommodation-ndis/106278364> retrieved 27 July 2026

¹⁵ “The detailed fire sprinkler cost estimate was determined by quantity surveyors, MBM in accordance with AS2118.1 (date?) and the report compiled by Ernst & Young. **NDIA SDA Pricing Review 2022-23: Technical Research Report – Sprinkler Costs** dated 12 May 2023 on page 7

¹⁶ *Ibid* on page 6



add around \$180,000 to the build price. And that's before fees and charges rise as consultants and industry experts – now in high demand – take advantage of the sudden demand created by mandatory fire protection sprinklers.

Then there's the expected cost blow-out at the next pricing review, as additional costs are "discovered" – potentially making the mandatory fire protection sprinkler requirement just another rort, along with \$100,000 of consultant fees, a \$20,000 "NDIS-approved" UPS, and all SDA payments calculated on the assumption that¹⁷ *"building types fall under the BCA Class 3 residential care building classification"* – regardless of whether those features were actually included.

Unfortunately, these are only estimates, because the NDIA has no cost control, audit, or even basic cost data collection in place. This program mismanagement has already resulted \$1 billion of investor funds being wasted . That is roughly the value of vacant SDA properties identified in the Four Corners program¹⁸

Then there is the reality that, over the last three years, there has been persistent unmet demand for SDA of around 38% – that's NDIS participants eligible for SDA but unable to find suitable accommodation, or with other reasons for not actually living in SDA¹⁹. Over the same period, SDA costs have almost doubled.²⁰

Adding another mandatory requirement – fire protection sprinklers – adds to the cost, complexity, and profit margins of consultants and investment funds, probably without saving any lives.

Given the multibillion-dollar costs involved, compliance with the Public Governance, Performance and Accountability Act²¹ would require a regulatory impact statement.

¹⁷Report compiled by Ernst & Young **NDIA SDA Pricing Review 2022-23: Technical Report - Benchmark Construction Costs** dated 18 May 2023 on page 6 and page 15

¹⁸ <https://www.abc.net.au/news/2025-08-25/specialist-disability-accommodation-sda-empty-homes-four-corners/105685946> retrieved 27 July 2026

¹⁹ <https://dataresearch.ndis.gov.au/reports-and-analyses/specialist-disability-accommodation-sda-data>

²⁰ *ibid*

²¹ <https://www.finance.gov.au/government/procurement/commonwealth-procurement-rules>



Other Considerations

There is a range of other considerations which have a bearing on the 2026 review of the SDA Design Standard. These range from alternative measures, to the failure to address SDA legislation requirements for a variety of family and personal circumstances and corresponding NCC codes, to the refusal of the NDIA to address criticisms from Royal Commissions and NDIS reviews.

Alternatives

Before any decision needs to be made, a range of alternatives should be considered - either more cost-effective or simply easier to implement.

Fire safety systems such as hardwired alarms modified to suit particular disabilities, and having fire blankets and extinguishers on hand along with suitable training, may be reasonable mitigation measures – along with reducing risk factors such as smoking indoors, and procedures to reduce or eliminate cooking and electrical fires.

All of these should be considered as an adjunct to other safety measures addressing fires in a residential setting.

However, the effectiveness of none of these measures has been considered in the current proposal.

Previous reviews- emergency evacuation

There are other reviews that have considered aspects of disability fatalities in preventable fires. For example, in a 2015 review the Australian Building Codes Board considered five options for the emergency evacuation of people with disability from buildings. They found:²²

“from a life safety perspective, the risk to life is very small. Emergency events are rare in Australia and new buildings are considered generally very safe”

and

Best practice cost-benefit analysis principles specify that intangible benefits need to be considered and evaluated against the scale of costs. Where costs are large and the benefits are intangible the status quo must be recommended. ... Based on COAG best practice regulation requirements this RIS recommends that the status quo remains.

²² ABCB, **Emergency Egress for Occupants with Disability - Regulation Impact Statement for Decision**, March 2015, Filename: *RIS-emergency-egress-for-occupants-with-disability-final-decision.pdf*



Over-regulation

R&IA believes that the call for mandatory fire protection sprinklers is a clear case of overregulation. In this particular situation, we agree with the recent Productivity Commission interim report, which states:²³

“Only regulate Housing design features when there are clear market failures and allow household to choose and pay for other features they value”

R&IA would like to paraphrase two recommendations of Chair of the Productivity Commission and previously CEO of Grattan Institute, from the essay The Red Tape Impulse:²⁴ [proponents of fire protection sprinklers] should be required to offset new regulations with deregulation elsewhere, similar to offset requirements for some pending proposals.

The proposal should also be independently reviewed:²⁵

The Office of Impact Analysis—the office that oversees regulation impact analyses—should be strengthened. It should be more independent from government, with a statutory commissioner to oversee it.

Conflict-of-interest

The problem can be traced back to a decision in 2019 to redefine SDA as a “one size fits all” commercial rental property – ignoring the legislative provision for SDA to provide for multiple building codes shown in Figure 1.

With \$4 billion now invested in new build SDA, questions of policy regarding disability housing and who gets a seat at policy table becomes critical.

Unfortunately, this appears to be a campaign largely waged behind the scenes, exploiting business and political connections.

Advice already provided by the ABCB to the NDIA in 2023 and published online - consistent with Schedule 1 of the SDA legislation - stated²⁶

“Question: Would Class 1b be required instead of Class 1a in a house if occupants were ‘unrelated’

²³ Productivity Commission 2026, **Interim report - Housing supply regulation**, Interim report, Canberra, July.

²⁴ Danielle Wood, date, **The Red Tape Impulse** <https://inflectionpoints.work/articles/the-red-tape-impulse> retrieved 28 July 2026

²⁵ Ibid

²⁶ (Ms) Joe Manton, "Participants are Paramount: Ensuring Safety in Specialist Disability Accommodation", June 23, 2023, <https://accessinstitute.com.au/participants-are-paramount-ensuring-safety-in-specialist-disability-accommodation/> accessed 11 May 2026



Response: Occupants of a Class 1a can be unrelated persons (not from the same family). The NCC does not specifically mention or discriminate between the relationship of people living in a Class 1a building. "

and

"Question: What is the building classification to use for the residents (SDA participants who all have a disability, some physical and some cognitive)?

Response: Building Classification is based on occupant profile

- If the occupants are 'People with disability' then the classification is Class 3. Based on level of care it can be Class 3 Residential care.

- If the dwelling is only for 1 person with a disability, then it can be Class 1a i.e., a person with a disability living with their family members. "

The advice was later taken down with no explanation from the ABCB.

What we do know is that in the same year²⁷:

"HIA with SDA Alliance and the Home Fire Sprinkler Coalition developed a proposal in 2023 for a new building classification"

At the same time the HIA has been running a campaign to oppose or defer adoption of cheap and widely available accessible mainstream housing²⁸, instead endorsing a range of government-funded SDA new-build programs.

Adoption of the mandatory fire protection requirement in SDA would send a powerful signal to the broader housing community – effectively eliminating NCC Class 1 family homes from funding in government-funded programs, in line with HIA policy, with significant profit implications for the building industry interests represented by the HIA.

Who is in charge of decision-making?

After 10 years of operation, one would think there was an established decision-making process with responsibilities clearly defined. You would be wrong.

Starting with the 2019 update, the NDIA Home and Living branch have set themselves up as an ersatz Australian Building Codes Board, developing a completely new definition of disability housing in accordance with the SDA Design Standard.

This is contrary to the APTOS agreement between the states and territories and the Commonwealth²⁹, which explicitly allows for NDIA activities including:

²⁷ Housing Industry Association , **Specialist Disability Accommodation Design Standard Review 2025-26, HIA response to consultation**, December 2025, filename: *SDA Design Standard Review 2025-26-5.pdf*

²⁸ <https://hia.com.au/our-industry/newsroom/industry-policy/2018/05/accessibility-in-residential-buildings> retrieved 18 June 2026

²⁹ <https://federation.gov.au/about/agreements/bilateral-agreement-between-commonwealth-australia-and-state-south-australia>



“developing partnerships with housing providers and influencing the development of housing options and housing design (not regulation or setting standards in housing design).”

There is no mention of NDIA acting outside its legislative authority and implementing, without consultation or public review, its own unique disability housing design standards, complete with a construction code tailored to provide a very profitable monopoly to selected building interests, or overriding existing SDA legislation by mandating fire protection sprinklers in SDA.

Complying with requests from building industry lobby groups without public review or a substantial business case is in stark contrast to the refusal of the NDIA to address recommendations from a range of other bodies.

For example a 2023 [South Australian parliamentary inquiry](#) report into the housing needs of South Australian NDIS participants – a forerunner of the “foundational supports” currently proposed but not yet implemented:³⁰

“....made 53 recommendations to the state government through the Minister for Human Services. that, if adopted and acted on, can provide relief to our state's disability populations, who have the greatest unmet housing need. They will provide opportunities for the commonwealth and the state to collaborate in achieving better outcomes—outcomes that are real and viable,The new models need to be co-designed with the participants. They have to be innovative. They do not need to be cookie-cutter...”

Then there are numerous recommendations from the NDIS Review. For example, Action 9.4 (implementation detail) states³¹:

*“The Improved Liveability category should be replaced by alternate Specialist Disability Accommodation (SDA) design categories which **meet the assessed needs of participants**. The review should be **conducted in consultation with participants, the SDA sector and disability community**. It should examine whether the High Physical Support, Fully Accessible and Robust categories are fit-for-purpose and enable delivery of **best practice and cost-effective** living supports for the **diversity of SDA participants**.” (my emphasis)*

Missing

This report opened with a question about the billion dollars’ worth of vacant SDA properties. R&IA is of the view that at least some of these properties are vacant because they simply do not meet the needs of NDIS participants with severe disability – including

³⁰ 26 September 2023 , Social Development Committee: Inquiry into the National Disability Insurance Scheme, report **46th report Impact of the National Disability Insurance Scheme (NDIS) on South Australians living with disability who have complex needs and are, or are at risk of, residing for long periods in inappropriate accommodation** available [here](#)

³¹ <https://www.ndisreview.gov.au/resources/reports/working-together-deliver-ndis/>



intellectual disability, acquired brain injury, neurodivergence, or a range of other severe disabilities.

Those needs are highlighted because there is a range of stakeholders whose voices are not being heard around the disability housing policy table: disability representative groups and peak bodies, and industry experts such as the Melbourne Disability Institute, the Centre for Universal Design, and the Rehabilitation, Ageing and Independent Living Research Centre.

Instead we have well-funded building industry lobby groups dominating the KPMG review reference group.

Decision-makers also need to consider the millions of dollars that could be saved by not having to retrofit assistive technology to address the needs of specific NDIS participants in SDA.

And there is the unnecessary cost burden of a compliant NDIA treating taxpayers' NDIS funding as an endless money supply at the behest of industry lobby groups.

Conclusions

Fire protection sprinklers are an essential element in the mix of building types and categories for SDA. But they should not be mandatory – should be a range of options available, and this is the current situation in the NDIS SDA legislation and National Construction Codes.

There is nothing inherently wrong with lobby groups such as the SDA Alliance and the Home Fire Sprinkler Coalition campaigning for wider use of fire protection sprinklers; the misleading and deceptive use of statistics and cost data in the media, however, is both unethical and wrong. It should not be allowed to pass unchallenged.

In line with accepted practice since Federation that the state and territories are responsible for housing, any changes to either the NCC or the SDA Design Standard should be subject to review and approval by the relevant state and territory housing ministers - and then only after:

1. an independent *public* review,
2. a regulatory Impact assessment,
3. comprehensive cost assessment, and
4. opportunity for all stakeholders to have their say.

The failure of the SDA Alliance campaign to mention National Construction Code implications or the 2022 ABCB Livable Housing Design Standard, together with legislative requirements being bypassed, financial conflicts of interest, possible multimillion-dollar costs, and the inappropriateness of making policy behind closed doors, is compounded by the lack of public disclosure of any drafts, and by the absence of clear accountability and transparency is not acceptable.



There are more important problems, such as \$1 billion worth of vacant property and the 38% of NDIS participants who cannot find a suitable SDA property, that need to be addressed before adding millions of dollars to the cost of SDA without any evidence of a single life being saved.

Fire protection sprinklers should not be mandatory in SDA. We should be celebrating a diversity of innovative disability housing solutions, along with a variety of NCC classifications, including SDA-registered NCC Class 1a family homes owned by their occupants.

Given the lack of cost-benefit analysis, or indeed evidence of a single life being saved, as well as the conflict with existing legislation, it is clear that resorting to mandatory requirements is unnecessary overregulation.



The last word

R&IA will finish with a photograph (overleaf) of one of the six shortlisted entries to the 2025 Royal Institute of British Architects (RIBA) Stirling Prize for the U.K.'s best new building: Niwa House in South London^{32,33}

Not shown, but worth an honourable mention, is 2025 winner Appleby Blue Almshouse^{34,35}, which shows what is possible in the affordable apartment space when freed from minimum mandatory requirements.

In the UK, accessibility requirements are part of mainstream residential design – unlike Australia, where new build accessible homes are largely limited to “special” standalone homes, or apartments with minimum mandatory standards while the remaining units remain inaccessible.

The 2 UK examples show what exemplary accessible housing can look like. A reminder that the SDA new build program is all about people's homes - including NCC Class 1a. And that NDIS participants should be treated as people, not a warm body with a revenue stream attached when occupying an SDA investment property.

“Architecture at its core must balance the often conflicting and potentially overwhelming demands of climate change, inclusivity, affordability, accessibility and safety in the pursuit of buildings that are useful, valued and beautiful to experience.”

Neil Gillespie, RIBA Awards Group Chair

³² <https://www.riba.org/explore/awards/uk-awards/regional-awards/2025/london-awards/niwa-house/>

³³ Niwa House – RIBA Stirling Prize 2025 shortlist YouTube link [here](#)

³⁴ Lauren Del Fabro, 16 October 2025, "Riba Stirling Prize 2025 won by 'radical' social housing complex", <https://www.independent.co.uk/news/uk/home-news/royal-institute-of-british-architects-london-bermondsey-east-sussex-b2846957.html>

³⁵ <https://www.riba.org/explore/awards/uk-awards/stirling-prize/stirling-prize-2025/>



Figure 2 - NIWA HOUSE³⁶

³⁶ <https://www.t-sa.co.uk/> retrieved 27 July 2026