SUBMISSION

HOUSING STRATEGY FOR SOUTH AUSTRALIA: GREEN PAPER

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1. Introduction

National Disability Services South Australia Division welcomes the opportunity to provide a submission to the Housing Strategy for South Australia: Green Paper.

National Disability Services (NDS) is the disability industry representative body, with approximately 649 members Australia-wide. With 54 South Australian organisational members, NDS SA has extensive representation of the State's disability services sector. NDS SA members provide disability supports including employment services, day options services, supported accommodation, and respite. NDS SA is working with its members and the State Government to support the delivery of sustainable and quality disability supports and services to South Australians living with disability.

2. NDS SA's Recommendations

2.1 The State Government must consider earmarking a proportion of the proceeds from the sale of the Strathmont Centre land to use to develop accessible and affordable housing for people living with disability in South Australia.

If the State Government follows the recommendations in Strong Voices: A Blueprint to Enhance Life and Claim the Rights of People with Disability in South Australia (2012-2020) (‘Strong Voices Report’), all people living with disability who are currently residing at Strathmont Centre and at Highgate Park will be moving into the community in the near future. It is a positive and long-overdue decision to move people living with disability out of institutional housing; however the people moving out of these institutions will need somewhere else in the community to live that is accessible and affordable.

In addition to the people living with disability who are currently residing at Strathmont Centre and at Highgate Park, there are many other South Australians living with disability who will also need accessible and affordable housing options in the community and this need will continually increase. For this reason the State Government must find solutions to meet this need. One such solution would be to earmark a proportion of proceeds from the sale of the Strathmont Centre land for the development of accessible and affordable housing options for people living with disability. This solution is a practical and innovative method of addressing the ever increasing need of providing accessible and affordable housing options for people living with disability and also putting money that had been previously earmarked for disability back into the disability services sector.

2.2 The State Government must consider the impact of the rising cost of living and the benefits of using renewable energy in housing.

The rising cost of living affects all South Australians; however people living with disability generally receive pension-only incomes or pension incomes in addition to low employment wages. Consequently, people living with disability spend a greater proportion of their incomes on utilities when compared to the rest of the population and are one of the least likely groups of people to be able to afford the increasing cost of utilities. The rising cost of
living by itself is difficult for people living with disability to meet, but if they want to install renewable energy sources to improve the efficiency of energy and other utilities in their homes they will struggle even more. People living with disability have the right to receive the benefits of using renewable energy sources such as solar panels, water tanks, insulation, and use of Clipsal CBUS (smart house) systems or similar systems for the control of lighting, heating/cooling and audio-visual systems. The use of renewable energy sources such as those previously mentioned are often expensive to install but will ensure long-term reduced utility costs and therefore assist in reducing the impact of the cost of living on people living with disability. Consequently the State Government must assist people living with disability to meet the costs of installing renewable energy sources.

Service providers in the disability services sector who provide accommodation to people living with disability must also be provided with assistance to install renewable energy sources such as solar panels, water tanks, insulation, and Clipsal CBUS (smart house) systems or similar systems for the control of lighting, heating/cooling and audio-visual systems in group homes and shared housing facilities.

The State Government must consider the impact of the rising cost of living on people living with disability and service providers in the disability services sector and also the benefits of using renewable energy. People living with disability and their service providers must be given assistance to meet the rising cost of living and to benefit from renewable energy.

2.3 The State Government must assist South Australians, including people living with disability, to ‘age in place’.

Most people, regardless of whether or not they are living with disability, have a desire to remain living in their own homes as they age – to ‘age in place’. People living with disability have the same right as people living without disability to live in and be part of their own communities, and also have the right to pursue lifestyles of their choice and participate fully in all aspects of community life. Without additional support and the development of more accessible housing options in the community, people living with disability will be unable to avoid moving into residential aged care, institutional models of housing or supported accommodation.

To enable people living with disability to remain living in their own homes as they age, all new housing and all extensions to existing housing must meet Universal Housing Design standards, which include installing ramps, handrails, lower bench tops in rooms such as kitchens, even lighting, contrasting decor, and creating wider door frames. The use of Universal Housing Design standards will not only assist people living with disability to ‘age in place’, but also assist the ageing population to remain living in their own homes, assist families with young children and people who sustain serious injury.


2.4 The State Government must improve access to housing for people living with disability and provide recurrent support funding.

The State Government must improve access to housing for people living with disability. A reason why many people living with disability are not able to access housing (such as social and community housing) is because people living with disability do not often meet the established criteria for priority housing. This is because many people living with disability are not homeless – they have somewhere to live, whether it is with their ageing parents or in a group home or shared housing. However, many people living with disability would benefit from a better housing option than their current living arrangement but due to their circumstances they are unable to access a better housing option. Circumstances may include a person living with disability: being unable to afford another housing option because of their low income (generally receiving a pension-only income or pension income in addition to low employment wages); being unable to obtain a better housing option because available housing is not physically accessible; not understanding the process for applying for housing; and/or is living with her/his ageing parents. Adults living with disability who are living with her/his ageing parents is an example of an unsuitable housing arrangement because adults living with disability have the right to move out of their family home and establish their own household. Similarly, parents of adult children living with disability have the right to have their children move to their own homes.

Improving access to housing will mean that the application process will need to be accessible, for example the steps in the process need to be clearer, in plain English and in other formats such as audio-visual and Braille. Improving access to housing will mean improving the coordination/interface between the housing and disability services sectors. The housing and disability services sectors will need to work closer together to ensure that people living with disability are able to access their desired housing option. An example of this would be for a greater engagement of the disability services sector in housing design and development at the planning stage. Improving the coordination/interface between the housing and disability services sectors would also include providing recurrent support funding because many types of disability are long-term or lifelong disabilities which means that a person living with disability often requires funding throughout their life and in many different aspects of life (such as housing, daily living, employment etc). Improving access to housing will mean ensuring housing is physically accessible by following Universal Housing Design standards and installing ramps, railings, even lighting, contrasting decor, and wider door frames, etc. Improving access to housing will also mean ensuring housing options (including social and community housing and private rental housing) are affordable for people living with disability.

Improving access to housing will also mean ensuring the community (i.e. shops, parks, buildings, generic services and transport) is more accessible in terms of being affordable and physically accessible. Transport is just one factor to consider when creating an accessible community. Accessible transport includes people living with disability being able to physically get in and out of buses, trains, trams and taxis. However, accessible transport is not limited to the physical accessibility of the type of transportation a person uses, but also includes transport routes – public transport infrastructure must enable people living with
disability to access the community including essential services such as shops and hospitals. Housing must therefore be developed where there is accessible transport.

Increased social and community housing opportunities as well as more accessible housing options must be made available to people living with disability. Increased accessible social and community housing opportunities will not only assist people living with disability but also assist the ageing population, families with young children, and people who sustain serious injury.

2.5 The State Government must assist service providers to prepare for increased individualisation including a substantial increase in self-management – voice, choice and control.

- Services and supports provided to people living with disability are becoming more personalised and individualised. Many services and supports involve person-centred planning and include individual plans. If the Productivity Commission’s proposed National Disability Insurance Scheme (NDIS) is introduced, support and services will become even more personalised and individualised with people living with disability able to choose how and where to spend their funding. Many people living with disability are likely to choose to spend their money on housing options. It is expected that the NDIS will create a greater separation between housing and support arrangements - meaning the housing sector must address the need for a range of housing models and designs to be accessible, affordable and available to people living with disability (including the creation of alternative models of accommodation that meet the needs and choices of people living with disability, which may include designs to accommodate carers of people living with disability to co-reside or temporarily stay to provide additional support when necessary) and enable ‘ageing in place’.

- Recommendation 11 (relating to individualised funding) from *Strong Voices: A Blueprint to Enhance Life and Claim the Rights of People with Disability in South Australia (2012-2020)* (‘*Strong Voices Report*’) has been prioritised by the South Australian Minister for Disabilities.

3 The Case Supporting NDS SA’s Recommendations

3.1 The Rights of People Living with Disability

As at the end of March 2011, the South Australian population was estimated to be 1,654,200.4 Approximately 21% of the South Australian population are living with disability.5 These people living with disability in South Australia have the same rights as people living without disability, including:

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• the right to live in and be part of their own communities, and also have the right to pursue lifestyles of their choice and participate fully in all aspects of community life,\textsuperscript{6}
• the right to access the physical environment, transportation, information and communications, and other facilities and services open or provided to the public.\textsuperscript{7}
Access to the community shall include the identification and elimination of obstacles and barriers, and applies to buildings, roads, transportation and facilities including schools and housing,\textsuperscript{8} and
• many other rights, including the right to access education, health, work and employment, justice and to equal recognition before the law.\textsuperscript{9}

3.2 Reality

Even though they have these rights, many people living with disability are not able to live in and participate in the community and do not have the opportunity to make choices about their lives including where they live. People living with disability often have limited housing options and support and services available to them. This is predominantly due to need exceeding availability of support and services in the disability services sector, inadequate funding of the disability services sector (including ongoing/recurrent funding), support and services in the disability services sector not being person-centred and/or focused on the right of choice for people living with disability, and also people living with disability generally receiving low incomes (many are on pension-only incomes while some also receive low employment wages).

People living with disability do not often meet the established criteria for priority social and community housing. This is because many people living with disability are not homeless – they have somewhere to live, whether it is with their ageing parents or in a group home or shared housing. Many people living with disability would benefit from a better housing option than their current living arrangement. However, often people living with disability:
• cannot afford another housing option because of their low income,
• are not able to obtain a better housing option because available housing is not accessible,
• are not able to understand the process for applying for housing, and/or
• are adults living with disability who are living with their ageing parents. Adults living with disability who are living with their ageing parents is an example of an unsuitable housing arrangement because adults living with disability have the right to move out of their family home and establish their own household. Similarly, parents of adult children living with disability have the right to have their children move to their own homes.

Increased social and community housing opportunities as well as more accessible and affordable housing options must be made available to people living with disability.

\textsuperscript{7} United Nations Convention on the Rights of Persons with Disabilities, Article 9.
\textsuperscript{8} United Nations Convention on the Rights of Persons with Disabilities, Article 9.
3.3 Reform in South Australia

There are a number of significant reforms pertinent to people living with disability which should be addressed by the South Australian State Government in the Housing Strategy for South Australia. These reforms are: the United Nations Convention on the Rights of Persons with Disabilities; Strong Voices: A Blueprint to Enhance Life and Claim the Rights of People with Disability in South Australia (2012-2020) ('Strong Voices Report'); the closing of Strathmont Centre and Highgate Park; and the NDIS.

Australia has ratified the United Nations Convention on the Rights of Persons with Disabilities and thus committed to recognising “the importance for persons with disabilities of their individual autonomy and independence, including the freedom to make their own choices”,\(^\text{10}\) as well as a commitment over time to enable people living with disability to choose where they will live, who they will live with, who supports them and how they are supported.\(^\text{11}\) These commitments will mean that housing and support models will need to be created to respond to people living with disability making choices or changing their choices about their living and support arrangements.

The Social Inclusion Board released the Strong Voices Report in October 2011. This Report outlines the plan for reforming the South Australian disability services sector, and focuses on six areas:

- creating accessible and inclusive communities,
- preventing people falling into crisis by developing a model of early investment,
- making sure that everyday services such as education, employment, and health work better for people with disability,
- providing more choice through expanding individualised funding,
- providing better support for carers, broadening the range of accommodation options available and closing the Strathmont Centre, and
- ensuring there are adequate safeguards in place to protect vulnerable people.

It is important for the Housing Strategy for South Australia to contain links to the recommendations in the Strong Voices Report including the recommendations of: creating accessible and inclusive communities, increasing the availability of a broader range of accommodation options, and closing Strathmont Centre and Highgate Park. All of these recommendations will impact the housing sector – more accessible and affordable housing for people living with disability will need to be made available.


and available to people living with disability (including the creation of alternative models of accommodation that meet the needs and choices of people living with disability, which may include designs to accommodate carers of people living with disability to co-reside or temporarily stay to provide additional support when necessary) and enable ‘ageing in place’.

Most people have a desire to remain living in their own homes as they age – a desire to ‘age in place’. People living with disability often have the desire to remain living in their own homes, and have the right to live in and be part of their own communities and to pursue lifestyles of their choice and participate fully in all aspects of community life. However, without additional support and the development of more accessible and affordable housing options in the community, people living with disability will be unable to avoid moving into residential aged care, institutional models of housing or supported accommodation.

4. Proposed Directions

NDS SA supports the Housing Strategy for South Australia: Green Paper’s Proposed Directions for housing, particularly: improving the way people access and are supported in housing, facilitating more affordable and high needs housing opportunities, and creating sustainable neighbourhoods and communities of which affordable housing is a part.

NDS SA congratulates the State Government on a number of recent achievements which impact people living with disability directly, including: assisting people living with disability to move out of Strathmont Centre into supported accommodation in the community (the South Australian Minister for Disabilities has fast-tracked this recommendation from the Strong Voices Report), commencing work on the Woodville West urban design to ensure features that promote accessibility, safety and independence for older people and for people living with disability, and establishing the ‘Ask Just Once’ initiative which is a single point of entry for the allocation of housing which enables people to access government services more easily and assists with identifying those people most in need of housing. NDS SA also congratulates the State Government on increasing several utility concessions for people living with disability, including: water rate concessions increasing by 5%, energy concessions increasing by 5%, increasing sewerage and emergency services levy (fixed property) concessions, and for creating the Medical Heating and Cooling Concession for people who have a medical condition and are affected by extreme hot or cold weather.

NDS SA agrees with an increase in the number of people living with disability in stable supported community accommodation (target 11 in South Australia’s Strategic Plan).

Although the future looks brighter, much more needs to be done by the State Government to meet the housing and other needs of people living with disability in South Australia.

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5. **Suggested Questions to Consider from the Housing Strategy for South Australia: Green Paper**

5.1 What are your views on the future directions for housing in this state?

- People living with disability need accessible and affordable housing with appropriate recurrent support funding. People living with disability need to be included as a high priority group for a broad range of housing options including social and community housing and the private rental market (this includes adults living with disability who are living with ageing parents as this is not an acceptable or suitable arrangement).

- All new housing and all extensions to existing housing must meet Universal Housing Design standards, which include installing ramps, even lighting, contrasting decor, handrails, lower bench tops in rooms such as kitchens, and creating wider door frames. Housing meeting Universal Housing Design standards will not only assist people living with disability, but also the ageing population, families with young children, and people who sustain serious injury.

- South Australians, including people living with disability, must be given greater choice in the type of housing they wish to live in and how to pay for the housing (e.g. renting or purchasing). People living with disability have the right to live in and be part of their own communities, and also have the right to pursue lifestyles of their choice and participate fully in all aspects of community life. Support and services provided to people living with disability are becoming more personalised and individualised. If the proposed NDIS is introduced, support and services will become even more personalised and individualised with people living with disability able to choose how and where to spend their funding. Many people living with disability are likely to choose to spend their money on housing options.

- In addition to being given greater choice in the type of housing they wish to live in and how to pay for the housing, people living with disability need to be provided with support to enable them to make those choices.

- Most people, regardless of whether or not they are living with disability, have a desire to remain living in their own homes as they age – to ‘age in place’. Without additional support and the development of more accessible housing options in the community, people living with disability will be unable to avoid moving into residential aged care, institutional models of housing or supported accommodation.

- Accessible communities as well as accessible housing must be considered a priority when looking at the future directions for housing in South Australia.

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• The State Government must consider the impact of the rising cost of living on people living with disability and their service providers and also the benefits of using renewable energy and energy efficient designs. People living with disability and their service providers must be given assistance to meet the rising cost of living and to benefit from renewable energy and energy efficient designs.

5.2 What are the challenges and opportunities?

• Opportunity: Improve the coordination/interface between the disability services and housing sectors to enable people living with disability to live in accessible and affordable housing in the community. The housing and disability services sectors will need to work closer together to ensure that people living with disability are able to access their desired housing option. An example of this would be for a greater engagement of the disability services sector in housing design and development at the planning stage.

• Challenge: People living with disability face many barriers in life including: discrimination, social isolation, and inaccessible communities. Accessing housing (in relation to physical accessibility and affordability) is another barrier many people living with disability face.

• Opportunity: Earmark a proportion of the proceeds from the sale of the Strathmont Centre land to use to develop accessible and affordable housing for people living with disability in South Australia.

• Challenge: People living with disability who are currently residing in Strathmont Centre and Highgate Park will need to move into accessible housing in the community, will there be enough money to support these people to move into the community? This question is particularly important if the State Government follows the recommendation in the Strong Voices Report to separate the provision of support and the provision of housing.

• Opportunity: Accessible and affordable housing would be suitable for people living with disability, the ageing population, families with young children, and people who sustain serious injury, and enable people to ‘age in place’.

• Challenge: There are a number of people living with disability who do not receive support or services from either government or non-government disability services organisations. These people can easily ‘fall through the net’ for access to housing services, and for many other essential services.

• Opportunity: Change the definition of high priority/high need for housing to include people living with disability (especially adults living with disability who are living with their ageing parents).

• Challenge: The State Government must recognise that people living with disability do not all have similar needs and wants in relation to housing or anything else.
- Opportunity: In addition to focusing on Aboriginal people and the homeless, the Housing Strategy for South Australia must also focus on people living with disability.

- Challenge: There is not enough consideration of the needs of people living with disability and the demand for housing. There is a lot of unmet need for housing (this is also referred to in the *Strong Voices* Report).

- Opportunity: The Housing Strategy for South Australia can link with the *Strong Voices* Report, United Nations Convention on the Rights of Persons with Disabilities, and the NDIS to ensure the housing needs of people living with disability are met.

- Challenge: Private rental housing causes problems, such as the application process and the cost. People living with disability are often on pension-only incomes or pension incomes in addition to low employment wages and are often unable to afford housing, particularly private rental housing.

- Opportunity: Clear the housing waiting lists. Too many people, including people living with disability, are on waiting lists to access housing.

- Challenge: 5% of affordable housing projects being available for people with ‘high needs’ (and not necessarily people living with disability) is not acceptable. The State Government must increase this number and include people living with disability in the definition of ‘high needs’.

5.3 Are there specific demographic, economic, locational or other differences that call for special attention?

- People living with disability are a demographic that calls for special attention in housing and many other areas.

- All housing must be accessible and affordable (many people living with disability are either on pension-only incomes or pension incomes in addition to low employment wages).

- Social and community housing must be accessible and affordable but also be designed to accommodate carers of people living with disability to co-reside or temporarily stay to provide additional support when necessary.

- Community facilities (e.g. shops, parks, generic services, buildings, transport) must be accessible to people living with disability.

- The location for housing and infrastructure needs careful consideration. For example, the location of accessible housing in proximity to service providers, employment, public transport, hospitals, and shops is very important. Accessible housing must be built in accessible communities.
• Regional areas also need accessible and affordable housing which is located in accessible communities.

5.4 Are there examples or solutions elsewhere of policy settings or partnering arrangements that could be implemented in SA?

• NDS Western Australia, the Housing and Urban Research Institute of Western Australia, and Curtin University of Technology conducted research into housing for people living with disability and recommended that “the only practical way of meeting the required demand will be through significant levels of stock transfers and dedicated housing allocations within appropriately designed mainstream public and community housing developments”.18 This conclusion was reached after looking at three alternative arrangements for enhancing the interface between the specialist disability services sector and housing sector, the alternatives were: partner with existing growth providers, create a new growth provider committed to disability service organisations and populations, and consider hybrid arrangements. None of the three options were considered to be capable of providing more than a small proportion of what is really needed by the sector.

• NDS National has stated that it is becoming common for the provision of housing and the provision of support to people living with disability to be separated. It is unclear whether this will be an effective change, as it may cause more problems (e.g. difficulty with funding, especially ongoing/recurrent funding and support for the whole of life for people living with disability). The separation of the provision of housing services and the provision of support has been recommended in the Strong Voices Report. The Strong Voices Report has also recommended establishing a Community Visitors Scheme to monitor standards of disability housing and accommodation services settings. This recommendation, if introduced, would enable people living with disability and their families and carers to provide feedback on the effectiveness of the separation of housing services and support.

• Amend the State taxation system to increase the supply of affordable housing. NDS Victoria recommended that the Victorian State Government identify and consider options for amendments to the taxation system which would expand the supply of affordable housing (e.g. waive land tax for families purchasing a home for their adult son or daughter living with disability).

5.5 What specific solutions should governments, private industry and the not-for-profit sector take?

• Invest in the capacity and sustainability of the disability services sector, this includes providing recurrent support funding because many types of disability are long-term or lifelong disabilities which means that a person living with disability often requires

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18 Housing and Urban Research Institute of Western Australia, 2010, Identification and Evaluation of Options for Specialist Disability Housing for Clients with a Range of Needs and Disabilities, HURIWA, Perth, p. 49.
funding throughout their life and in many different aspects of life (such as housing, daily living, employment etc).

- Improve the coordination/interface between disability services and housing sectors. The housing and disability services sectors will need to work closer together to ensure that people living with disability are able to access their desired housing option. An example of this would be for a greater engagement of the disability services sector in housing design and development at the planning stage.

- Follow the Strong Voices Report’s recommendations for reform, particularly recommendations: 5 (relating to prioritising universal access design principles); 11 (relating to individualised funding); 26 (prioritising the relocation of people living with disability from Strathmont Centre); 28 (upgrading existing social housing stock for people living with disability); 29 (separation of housing providers and provision of care and services); and 30 (relating to Residential Agreements and the rights of people living with disability).

- The State Government must consider earmarking a proportion of the proceeds from the sale of the Strathmont Centre land to use to develop accessible and affordable housing for people living with disability in South Australia.

- The State Government could vary its land management agreement for land sale which currently includes a 15% affordable housing policy for all new significant developments. The current policy could be varied to include a specific percentage of all new significant developments be dedicated to housing for people living with disability.

- Ensure housing is accessible and affordable for people living with disability.

- Increase and sustain investment in social and community housing.

- Improve the housing application process to make it more accessible. For example, the steps in the process need to be clearer, in plain English and in other formats such as audio-visual and Braille.

- Change the definition of high priority/high need to access housing to include people living with disability (including adults living with disability who are living with their ageing parents).

- Prepare for the introduction of the proposed NDIS which will, if introduced, lead to supports and services becoming even more personalised and individualised and lead to people living with disability having increased choice in how and where to spend their funding. Many people living with disability are likely to choose to spend their money on housing options. It is also expected that the NDIS will create a greater separation between housing and support arrangements.
• Create alternative models of accommodation that meet the needs and choices of people living with disability. Alternative models of accommodation may include designs to accommodate carers of people living with disability to co-reside or temporarily stay to provide additional support when necessary.

• Provide appropriate respite housing in metropolitan, regional and remote areas.

• Ensure that all new housing and all extensions to existing housing meet Universal Housing Design standards.

• Social and community housing must include heating and cooling appropriate to the geographic area and the needs of residents, and social and community housing must be located in areas close to public transport and essential community services.

• Build more accessible and affordable social and community housing in rural and remote areas so that people living with disability currently living in rural or remote areas do not have to relocate to larger towns or cities and consequently lose access to current support and services, social networks and employment.

• Social and community housing must be accessible and affordable but also be designed to accommodate carers of people living with disability to co-reside or temporarily stay to provide additional support when necessary.

• Streamline assessments and utilise specialist services to prioritise access to housing.

• Ensure any State Government housing program, such as the National Rental Affordability Scheme and the Affordable Homes Program, has specific targets for housing for people living with disability.