

Proposed Redevelopment of Crowle Home, Meadowbank: Review of Social Impacts & Consultation

September 2011

This report has been prepared for

**Penklis Lawyers for and behalf of
Friends of Crowle Home Inc**

by

 **JUDITH STUBBS**
& ASSOCIATES

The Old Post Office
231 Princes Hwy, Bulli NSW 2516

Ph: 02 4283 7300

Fax: 02 4283 7399

info@judithstubbs.com.au

www.judithstubbs.com.au

This Report has been prepared by:

Judith Stubbs BSW UNSW PhD RMIT

Mr Lewis Wilson BSc (Human Geography)

Ms Colleen Lux BA MSc (Environmental Studies)

Disclaimer

© Judith Stubbs & Associates

All Rights Reserved. No part of this document may be reproduced, transmitted, stored in a retrieval system, or translated into any language in any form by any means without the written permission of Judith Stubbs & Associates.

Intellectual Property Rights

All Rights Reserved. All methods, processes, commercial proposals and other contents described in this document are the confidential intellectual property of Judith Stubbs & Associates and may not be used or disclosed to any party without the written permission of Judith Stubbs & Associates.

Table of Contents

Executive Summary.....	6
Purpose of the Report	6
Rationale for JSA Engagement.....	6
Overview of Methodology.....	7
JSA Review of Relevant DGRs	8
Scoping of Likely Social Impacts and Mitigations	12
1 Introduction	19
1.1 Proposed Redevelopment of Crowle Home	19
1.2 History of Crowle Home	21
1.3 Management Structure	21
1.4 Proposed Relocation of Residents & Services	23
2 Methodology	24
2.1 Literature Review	25
2.2 Site Visit	26
2.3 Interviews with Families & Other Stakeholders	26
3 Metro, Sub-Regional & Local Planning Context	29
3.1 Metropolitan Plan for Sydney 2036.....	29
3.2 Inner North Metropolitan Strategy	30
3.3 Local Context.....	30
3.4 Meadowbank Employment Area Master Plan	31
3.5 Site Visit & SEPP Seniors/AS 1428.1	31
3.5.1 Overview	31
3.5.2 Locational Analysis.....	32
3.5.3 SEPP SL (2004)/AS 1428.1 Accessibility and Service Analyses.....	34
4 Disability Policy & Research Context	36
4.1 Overview.....	36
4.2 Current NSW Disability Policy Context	37
4.3 Disability Accommodation Research & ‘Best Practice’	45
4.3.1 Academic Literature.....	46
5 Interviews w/ families, Crowle Home stakeholders and other key informants.....	54
5.1 Description of interviewees and themes explored.....	54
5.2 Description of clients of parents/siblings and guardians interviewed	56
5.3 Key Findings from Interviews w/ Families, Guardians & Crowle Stakeholders	56
5.3.1 Consultation about proposed redevelopment & re-housing	57
5.3.2 Staffing Levels & Turnover.....	60
5.3.3 Level of Care Provided.....	61
5.3.4 Reduced Transparency in Management	62
5.3.5 Client Safety	63
5.3.6 Social Isolation/Lack of activities.....	63
5.3.7 Suitability of existing residents for community living.....	65
5.4 Key findings from interviews with other service providers/experts	66
5.4.1 Lessons Learned from the Devolution of Greystanes Children’s Home, Leura NSW	67
5.4.2 Ageing residents with Intellectual Disability.....	69
5.4.3 Consideration of the Crowle Home Redevelopment Proposal.....	70

6	Housing Affordability in Ryde LGA.....	74
6.1	Overview.....	74
6.2	Local Housing Affordability and Housing Stress	74
7	JSA Review of the Environmental Assessment against DGR 17 and 18	79
7.1	Overview.....	79
7.2	DGR 17 – Consultation	79
7.2.1	Overview	79
7.2.2	The Proponent’s Role.....	80
7.2.3	“Adequate and Appropriate” Consultation	86
7.2.4	The Consultation Process.....	89
7.2.5	Report of the Consultation Process	94
7.2.6	JSA Interviews with Families of Crowle Residents re: Consultation	94
7.2.7	Achieve Australia Information Session on 8 September 2011.....	96
7.3	DGR 18 – Impact on Existing and Future Residents /Tenants.....	97
7.3.1	Overview	97
7.3.2	Relocation Strategy	97
7.3.3	Adequacy of existing services to meet the needs of new tenants/residents	105
7.3.4	Nature of Consultation with Existing Community Regarding Relocation Strategy	107
7.3.5	Concept Plan to Consider Housing Choice and Affordability	107
8	References	114
	APPENDIX 1: JSA ASSESSMENT AGAINST RELEVANT CRITERIA OF SEPPSL AND AS1428.1	116

Figures

Figure 1-1: The Site, 76-78 Belmore Street, Meadowbank	19
Figure A1-1: Kerb ramp at Belmore St - Constitution Road intersection.....	116
Figure A1-2: Belmore Street footpath, looking North (site fence on right)	117

Tables

Table 2-1: Interviewee types and questions	28
Table 3-1: Public Transport Locations and Distances	33
Table 4-1: IAF Summary Table	40
Table 5-1: Key social impacts identified.....	71
Table 7-1: JSA Assessment of Proponent Consultation	82
Table 7-2: “Adequate and Appropriate” Consultation.....	87
Table 7-3: The Consultation Process	90
Table A1-1: SEPPSL 2004 Access Analysis	118
Table A1-2: AS1428.1 Accessibility Analysis.....	119

Table A1-3: Services, West Ryde Marketplace	121
Table A1-4: Services, Top Ryde Shopping Centre	122

Executive Summary

Purpose of the Report

In June 2011, Judith Stubbs and Associates (JSA) accepted a brief from Penklis Lawyers, who are representing a number of concerned parents and relatives of clients with an intellectual disability currently living at Crowle Home, located at 76 Belmore Street, Ryde. The Crowle Home site is currently the subject of an application lodged under Part 3A of the *Environmental Planning and Assessment Act 1979 (NSW)* for a Concept Plan that seeks to redevelop the site to construct 470 apartments and associated facilities. This will involve the closure of the existing residential facility and other activities currently occurring on the site, and the relocation of existing residents to accommodation within the community. It will also involve the relocation of a day care centre servicing residents and other clients with an intellectual disability to another site.

JSA have been asked to review documentation related to the likely social impacts of the proposed redevelopment, and to undertake additional research where the identification of impacts appears to be inadequate, so as to ensure that relevant impacts are understood and avoided or mitigated to the greatest extent possible. This is particularly due to the vulnerability of those most likely to be affected by the application, and the concerns of relatives and other stakeholders including some former staff of Crowle Home. The documents reviewed are principally relevant sections of the applicant's Environmental Assessment (EA), and the Social Impact Assessment (SIA) which forms the basis of relevant views put forward in the EA. JSA was also requested to review the adequacy of the EA and SIA in meeting the requirements of relevant Director General's Requirements (DGRs), specifically DGR 17 and DGR 18, in consideration of potential social impacts on the residents of Crowle Home and on the wider locality.

Whilst a rigorous methodology has been applied in relation to this review, the scope is necessarily preliminary as much of the information that would have been required to do a more comprehensive review has not been available in the documentation associated with the application, and the primary research undertaken was limited by the timeframe and project brief, as well as lack of access to the site and many of the residents and their families. Requests to interview senior Achieve Australia staff, through which we would have pursued appropriate avenues to access more residents and their families, were not granted, which provides a further limitation to the review. Nonetheless, a broad cross-section of stakeholders has been interviewed, which has provided the basis of some of the findings of this review.

It is noted in this regard that the responsibility to undertake a detailed SIA rests with the applicant. As such, this review seeks principally to ensure that any gaps in the SIA and related documents are identified so as to avoid or mitigate adverse social impacts wherever possible, and recommend ways that these may be addressed by the applicant in the future.

Rationale for JSA Engagement

It is understood that JSA has been engaged to undertake this review due to the extensive experience of Principal, Dr Judith Stubbs, in research and practice in matters directly related to the subject application. Dr Stubbs has worked extensively with vulnerable communities in areas

undergoing major redevelopment, including under Part 3A of the Act, ensuring participation of such communities in the identification of likely social impacts and the development of appropriate mitigation strategies. Such communities have included those with high proportions of people with psychiatric and intellectual disabilities, and other vulnerable groups. An example is her role in preparing all of the detailed consultation, services, transition, rehousing and relocation Plans associated with the rehousing of over 800 public housing families for the proposed redevelopment of Bonnyrigg Public Housing Estate in Southwest Sydney, the largest such PPP undertaken in Australia to date. The detailed SIA prepared by Dr Stubbs and her team is regarded as a best practice example of such work internationally. Dr Stubbs is also regarded as an expert in both the preparation and peer review of Social Impact Assessments, and frequently undertakes peer reviews of SIAs in relation to diverse proposals, including for developments under Part 3A of the Act, for state and local government. She was a member of the NSW State Government's Social Impact Assessment Panel in relation to gaming and licensed premises applications from 2001 to 2009. Dr Stubbs' research and practice in these areas, as well as in affordable housing, urban renewal, and participatory research with highly disadvantaged and vulnerable communities, led to her appointment as Senior Visiting Research Fellow at City Futures at the University of NSW in 2006, a position which she continues to hold. She has been awarded a number of awards for planning excellence, and holds a PhD from RMIT (interdisciplinary thesis on planning law, land economics and affordable housing policy).

Overview of Methodology

In order to review the social impacts associated with the proposed closure and relocation of current residents at the site and in the wider community, and to review the adequacy of relevant documentation accompanying the Concept Plan application, JSA undertook a number of research strategies, including:

- Review of relevant documentation and literature pertaining to supported accommodation services, deinstitutionalisation, the proposal, and the history of Crowle Home;
- Review of relevant local, sub-regional and metropolitan planning documents;
- 19 semi-structured, in-depth interviews with key stakeholders, including: family members of people currently receiving accommodation and other support from Achieve Australia (at Crowle Home and elsewhere); ex-staff members of Achieve Australia and former volunteers; and relevant spokespeople from other government and non-government disability services providers.
- Follow up conversations with selected interviewees in order to understand the relocation planning and consultation process undertaken by Achieve Australia;
- Site visits in order to understand the site and immediate surrounds, and to assess site compliance with selected planning standards, namely SEPP Senior Living (2004) and AS1428.1 due to the relevance of such a development to the needs of Achieve clients and the locality more broadly;

- Review of relevant additional demographic and housing data related to the locality, including a review of previous studies undertaken by JSA for City of Ryde Council in affordable housing and strategic planning.

A summary is first provided of JSA's preliminary review of the EA and SIA against the relevant Director General's Requirements (DGRs). This is followed by a summary of potential positive and adverse social impacts, and broad recommendations on mitigations that may assist in addressing adverse social impacts identified.

JSA Review of Relevant DGRs

Section 7 of this report provides our preliminary review of the applicant's EA and SIA against the relevant Director General's Requirements (DGRs), namely DGR 17 and DGR 18.

- DGR 17, which states that the applicant must "undertake an appropriate and justified level of consultation in accordance with the Department's Major Project Community Consultation Guidelines October 2007"; and
- DGR 18, which requires an assessment by the proponent for consideration of the social impacts on existing and future residents, including the social, health and safety impacts on existing and future residents.

DGR 17: Consultation

The NSW Department of Planning *Guidelines for Major Project Community Consultation October 2007* states that, "consultation is part of working openly with the community and other stakeholders and providing opportunities for their views and preferences to have input into the assessment process and decision making" with the goal of consultation being "to strengthen decision making by ensuring all relevant issues are considered."¹

In summary, relevant documents reviewed (principally the EA and the SIA), as well as additional research undertaken by JSA, indicate that there are serious inadequacies in the process implemented and/or reported by the applicant against all relevant criteria in the Department's Guidelines. This includes:

- No evidence in the EA or SIA that there was direct consultation with existing residents or their families regarding the proposal prior to lodgement of the EA, no documentation of relevant concerns and how these have been considered and addressed in the EA. Such concerns are supported by reports from those interviewed by JSA during the preparation of this report that the process was highly unsatisfactory. This is a significant issue given the serious potential adverse impacts on these groups, and the desirability of factoring in key considerations or mitigations into the proposed redevelopment;
- No evidence that the views or preferences of existing residents, their families, neighbours or the wider community have been taken into account in the SIA and decision making process by the applicant (e.g. the EA does not contain a matrix of concerns raised and

¹ NSW Department of Planning (2007) Guidelines for major project community consultation, October, Pg 2.

ways these had been addressed). Again, this is serious deficiency given the vulnerability of residents and their families to adverse social impacts, and the importance of factoring in appropriate mitigation that would assist in satisfying the matters raised by these groups;

- Consultation appears to have involved a narrow range of stakeholders. For example, the families of Crowle residents report that they were not invited to the 'information session' which the applicant conducted during the EA exhibition period, and there is no evidence that other key individuals, interest groups or organisations with a state or national interest in disability services have been consulted regarding the proposal in the SIA (e.g. no detailed summary of interviews with such stakeholders is provided in the SIA). Such organisations could have included, for example, intellectual disability advocates; the NSW Department of Ageing, Disability and Home Care; City of Ryde Council staff specialising in social planning and/or disability programs and services;
- Consultation in the lead up to the preparation of the EA also appears to have been limited to a series of 'information sessions', and most of the methods suggested by the Department in the Department's Major Project Community Consultation Guidelines are not reported to have been utilised.
- No information or evidence of protocols or special methods used to engage vulnerable and disadvantaged people relevant to the proposal in the process is provided, and no evidence of consultation with these groups is provided in the EA or SIA (e.g. frail aged, people with an intellectual disability or their families);
- No details is provided in the EA regarding the process for ongoing consultation with relevant individuals or groups, which is likely to be very important given the protracted process of relocation and transition involved in the redevelopment, and the vulnerability of residents during this process as discussed above;
- No detailed reporting or documentation of consultation outcomes is provided in the EA or SIA as required under the Guidelines.

DGR 18: Social Impacts on Existing and Future Residents

Relocation Strategy

As part of the Director General's Requirement 18 (DGR 18), the applicant is required to:

'Prepare a relocation strategy for existing tenants and private residents/occupants, including consideration of timing, relocation assistance and protocols for ensuring that existing residents/tenants will not be disadvantaged by any relocation;'

However, there is no documented evidence in or attached to the EA that such a relocation strategy exists or is being effectively implemented. Significant concerns were raised by those interviewed during our research that the process has been inadequate in a number of ways, particularly regarding the lack of information and engagement of family members in the future housing choices and service arrangements of existing residents, including those already relocated. As noted below, reports of deteriorating conditions onsite for remaining residents is also a serious

concern, as is the lack of a detailed relocation strategy for remaining residents, and plans for adequate care, health and safety during the transition and redevelopment process. This is reported to be leading to high levels of stress and anxiety for residents and their families. **It may be preferable that the relocation of residents ceases until detailed plans are provided for how these issues will be managed in the future.**

It is also noted that individual Transition Plans are a requirement of the NSW ADHC for any resident transitioning to a placement in supported accommodation. The requirements of these transition plans are set out in Section 7.11 of the NSW DHS publication *Allocation of Places in Supported Accommodation*. Again, the process is reported to have been inadequate by many of those interviewed by JSA. It may well be that the relocation process has been more satisfactory than reported by many interviewees in the course of JSA's research, and that detailed written procedures and protocols exist. However, there is insufficient evidence in the EA or the SIA of the nature of the process to date, which generally contain vague statements about the process that will be implemented. No written plans, procedures or protocols are provided with the EA. **Though only a Concept Plan at this stage, the nature of the proposal and the potential for significant adverse social impacts should again have guided the provision of sufficiently detailed information to make an assessment of the adequacy of the measures that will accompany the redevelopment.** Again, this appears to be a significant deficiency of the EA and related SIA.

Adequacy of existing services to meet the needs of new tenants/residents

Point 2 of DGR 18 also sets out the following requirement of the applicant:

'Address the adequacy of existing services, social infrastructure, employment opportunities, and open space to meet the needs of new disadvantaged/disabled tenants/residents and identify the range of new services proposed to meet the needs of tenants/residents'.

However, there is very limited information provided in the SIA regarding the nature, location or adequacy of services and facilities for people with a disability in the locality. There are likewise no interviews, surveys or other data provided regarding the availability or adequacy of services that may be accessed in the locality by the existing residents (should they remain onsite) nor other people with some form of disability if they are to move on to the site (for example, into the 10% of adaptable housing proposed as part of the development).

The lack of such data is a critical omission from the research conducted and reported as part of the EA and SIA, particularly given the nature of the proposal and the requirements under the amended DGRs. Statements that the 'majority will be already known to the service system' or that 'residents will be integrated into the wider community and would utilise services and facilities available to the whole community' (EA, p 76) are of little comfort when current service availability and capacity is not demonstrated in the SIA or EA. Further, the SIA notes that the proposal will 'increase the availability of supported accommodation places' (though as discussed later, there is no evidence for this statement provided to support this statement (see for example p53 of the SIA). *If* this were to be the case in the locality, again it would be prudent to understand the service environment into which this additional accommodation is being introduced. Finally, the SIA notes that, 'Interviews with service providers have provided an overview of existing and

anticipated service demand' (p 52). This may well be the case, but JSA was unable to find evidence of detailed data or information arising from such interviews to support claims made regarding service adequacy in the SIA.

It would appear that **far more information is required on service provision and adequacy in the locality, as well as the needs and the proposed level of service support for existing residents**, in order to satisfy this part of DGR 18 and ensure that potential adverse impact on residents or in the wider locality are avoided or adequately mitigated.

Nature of Consultation with Existing Community Regarding Relocation Strategy

Point 3 of DGR 18 also sets out the following requirement of the applicant:

'Identify the nature of consultation with the existing community regarding the relocation strategy'.

As noted above, there are serious deficiencies with consultation in general, and in relation to the Relocation Strategy in particular. This is regarded as a significant matter that would need be addressed before the EA would be regarded as satisfactorily demonstrating that there will be no (or at least acceptable level) of adverse social impacts. Again, this may warrant a cessation of relocation of existing residents until such matters are demonstrated as being properly addressed by the applicant.

Concept Plan to Consider Housing Choice and Affordability

Point 4 of DGR 18 also sets out the following requirement of the applicant:

'Identify how the Concept Plan has considered affordability and housing choice for the disadvantaged and disabled'.

The EA and SIA upon which it relies makes a range of statements about housing 'choice' and 'affordability', and the contribution which implementation of the Concept Plan will make to each of these issues. However, apart from providing a broad indicative mix of apartments, the documents provide little detail on how 'affordable housing' or 'housing choice' will be achieved as part of the redevelopment for people with a disability and people who are otherwise disadvantaged, nor the number and nature of dwellings that will be provided on-site or off-site through the capitalisation strategy that the applicant reports it is pursuing through the redevelopment. Likewise, very limited choice of housing options for those with moderate to high support needs is detailed in the EA/Concept Plan apart for broad statements that 'a number of units' may be retained on site to accommodate some existing residents. **Firm proposals for appropriate housing choice for existing and recently relocated residents need to be provided by the applicant as part of the Concept Plan, and these should be developed, where appropriate, with residents, their families and other key stakeholders. Targets, target groups and mechanisms to achieve genuinely affordable housing as part of the development should also be detailed.**

Scoping of Likely Social Impacts and Mitigations

A summary of potential positive and adverse social impacts is provided here, drawing on more detailed data and information in the body of the report. Overall, the risk of negative impacts on highly vulnerable groups and on the wider locality is significant, and we consider that a number of issues need to be addressed and/or more information provided before the application proceeds. There are also a number of potential positive impacts of the proposal; however, again more information needs to be provided on the proposal before benefits noted in the applicant's SIA could properly be claimed by the applicant. The mitigation of potential adverse impacts should also be addressed at this stage in a more detailed way to ensure that such impacts are addressed before, during and after the redevelopment. The following briefly addresses the potential positive and adverse impacts in turn, and proposes broad mitigations to address the current shortcomings of the proposal.

Positive Social Impacts

There are a range of likely positive impacts arising from the proposed redevelopment. These may be considered at two levels - impacts on existing residents of Crowle Home and other clients of Achieve Australia, and impacts in the wider locality. The following paragraphs provide an overview of these potential impacts, comments in a preliminary way on the likelihood that they will be achieved, and makes suggestions that may ensure such benefits arise from the proposed redevelopment.

In terms of **residents of Crowle Home and clients of Achieve Australia**, there is the potential for the following positive impacts, though in most cases insufficient detail is currently provided in the EA or the SIA to claim such impacts as a benefit of the proposal:

- Increased capital (community-owned) accommodation for Achieve Australia arising from the redevelopment of the site, which will most likely occur with a private sector partner/developer - achieving this benefit will depend upon the extent to which existing capital 'tied up' in the site can be exchanged for replacement capital stock (e.g. units, houses, facilities actually *owned* by Achieve) from the redevelopment. Currently, there is no detail provided in the SIA or EA on the expected capital return from the redevelopment of the site, and thus no way of assessing the extent to which there will be a benefit from the redevelopment, and the extent to which existing and potential bedspaces in Crowle Home will be replaced with new capital housing stock (estimated as a potential 70-80 *capital* bedspace capacity, though currently less *funded* places);
- Improved outcomes in quality of life for existing residents of Crowle Home arising from increased 'physical integration' from being accommodated within the wider community – the literature indicates that such outcomes often, though not always, accompany deinstitutionalisation of people with an intellectual disability. There are often benefits associated with some objective measures of quality of life, which can be an important benefit of the proposal. However, genuine 'social integration' is far more problematic, and there are significant risks of social isolation, and lower quality of life outcomes where

there is inadequate engagement of people with a disability and their families in the process of transition, relocation and housing choice, and where their service and support needs are not adequately considered and monitored as they move to community living arrangements. The EA and SIA again do not provide adequate evidence that such issues have been adequately considered or mitigated, and our research with key stakeholders including families of existing residents and those recently relocated out of Crowle Home, indicates that there have been significant problems with consultation and engagement on transition planning and implementation to date. There are also reported to be significant problems related to staff turnover and the deterioration of services currently being provided to the 30 remaining Crowle Home residents with moderate to severe intellectual disabilities. This does not bode well for residents who may remain on site during the redevelopment. These residents and their families will need high levels of support and appropriate levels of care to assist them to adjust to the ongoing loss of their friends, trusted staff members and the environment where most have lived for most of their adult lives. Again, **details of how the transition will be managed, for those who remain on site and those relocated throughout the process, are needed to mitigate the high levels of anxiety and distress some will experience, and to avoid impacts related to occupational health and safety during the physical redevelopment process;**

- Opportunities to diversify housing and support options to meet the needs of those with an intellectual disability arising from the redevelopment of the site and closure of Crowle Home, which is also in accordance with current government policy and good practice – government policy and the literature identifies a range of housing and support options appropriate to different support needs for people with an intellectual disability (See Table 4.2 in Section 4.2 below). However, the range of possible options for onsite replacement of housing are not currently considered or detailed in the SIA or EA, and proposals are limited to vague statements about rehousing some residents within ‘a number of units’ obtained through the redevelopment of the Crowle Home site. There is also no detail provided about the level of care required by existing residents, and a proper assessment of their needs in the SIA. **Far more detail on the amount, nature, models of care, timing and staging of replacement housing stock proposed by the applicant is needed for such a benefit of the redevelopment to be claimed and to ensure an important opportunity to obtain secure capital stock is maximised.** As noted below, it is also an important mitigation of negative impacts for this vulnerable group (see also ‘negative impacts’ below);
- As noted, a number of accommodation options are possible to replace the capacity for up to 90 secure capital bedspaces for people with an intellectual disability that will be lost as a result of the redevelopment, noting that there are currently less funded places at the home. This would provide a positive benefit of the project and a significant mitigation. Several factors suggest that a range of such accommodation and support options are required. These factors include:
 - the fact that the 31 remaining Crowle residents are older and have lived most of their adult life at Crowle Home,

- that the current residents have moderate to high support needs (some with early onset dementia) and are likely to be the hardest to rehouse;
 - the danger of social isolation and loss of important social networks for these residents (discussed below);
 - the locality already has a higher than average proportion of older residents and people with a disability and a projected shortfall of independent living units and high and low care housing options for older people and those with a disability;
 - that the applicant's SIA notes that the units constructed through the redevelopment are likely to attract a high proportion of those 55+ years of age
- However, a review of the Concept Plan documentation indicates that **most of the options that form part of the current government policy have not been considered on the site (or elsewhere), and the proposal for 450 one- and two-bedroom apartments and 20 three-bedroom apartments may preclude a number of these options. Again, such detail needs to be provided in the EA.**

In terms of the **wider locality**, there is the potential for the following positive impacts:

- The site has the potential to meet the strategic objectives of government through the development of 470 well-located apartments in an area identified as suited to intensive urban development;
- The provision of smaller units, including 10% as adaptable housing, provide increased housing choice for key target groups including younger and older couples and singles, as well as workers and students in the LGA. The nature of stock indicates that a reasonable proportion is likely to be purchased by investors, which is likely to increase stock available for private rental as well as purchase;
- There are likely to be ESD benefits from the development of well-located smaller accommodation close to transport and services, including efficient use of existing infrastructure, reduced car dependency, and the potential for adaptive reuse of some onsite buildings;
- The development of smaller units is likely to provide for an increased diversity in price points, with some lower amenity stock likely to be of 'lower cost' than larger units, which the market tends to favour. However, as noted in Section 6 of the Report, it is unlikely that the units created will be 'affordable housing' to most low to moderate income earners in the locality, including the 'disadvantaged and disabled' specified in DGR 18, without a deliberate strategy on the part of the applicant to create affordable housing. This may also depend on the fit out and the location of the individual units.

The EA and SIA make assumptions about the automatic affordability of the units that will be created, but no study or data is provided in support of this, and our preliminary research indicates that they will in fact be at the less affordable end of the multi-unit market in this part of the locality. Given the opportunities provide by this site, the serious need for affordable housing in the locality, and the fact that redevelopment is likely to

contribute to upward pressure in prices in a cumulative way, a number of mitigative measures are suggested under 'negative impacts in the wider locality' below.

Negative Social Impacts and Potential Mitigations

There are also a range of likely negative impacts arising from the proposed redevelopment, some of which are outlined as the 'other side' of potential positive impacts if the redevelopment (including transition and relocation of existing residents) is not well managed. These may again be considered at two levels - impacts on existing residents of Crowle Home and other clients of Achieve Australia, and impacts in the wider locality. The following paragraphs provide an overview of these impacts, comments in a preliminary way on the likelihood that they will occur, and makes suggestions regarding appropriate mitigations or future actions.

The key potential adverse social impacts on **individual residents of Crowle Home and their families**, or those recently relocated from it, include the following:

- **Uncertainty, stress, anxiety and related adverse health impacts** associated with reported high staff turnover, and deterioration of support, care and client supervision for residents still on site during the current 'wind down' of operations and transition to new living arrangements – our preliminary research indicates that there is cause for concern regarding the adequacy of consultation and engagement of residents and their families in transition planning as required by government policy; the adequacy of on-site care and change management processes at a particularly stressful time for residents and their families; and the lack of documentation by the applicant of detailed transition plans, protocols or service arrangements regarding the way in which the process will be managed to avoid or minimise potentially serious social (including health and safety impacts) on remaining residents. It is **recommended that the following mitigative measures be adopted by the applicant:**
 - **Provide documentary evidence of the consultation process, protocols and procedures associated with transition planning and relocation for existing and recently relocated residents and their families in accordance with government policy on transition planning and related matters (e.g. how individual choice in housing has been achieved, guarantees that there will be no service disruption or other disadvantage to residents from the relocation and/or change to accommodation and support arrangements, etc);**
 - **Provide detailed plans and protocols for how the redevelopment of the site and associated relocations will be managed so as to avoid negative impacts on residents including a detailed on-site service and change management plan; staging and rehousing plan (e.g. that identifies the residents who will remain on site and those who will be relocated, the staging of housing to be constructed on site and whether this can be built early so as to minimise the number of moves that residents may need to make; the service arrangements that will be implemented; OH&S plans as to how the physical redevelopment will be managed to avoid negative health impacts from demolitions, social instability, etc);**

- **Consider the cessation of all further relocations until the findings of this report have been carefully considered (in particular the outcomes of our preliminary consultation with key stakeholders reported in Section 5 and review of policy and literature in Section 4), and key stakeholders have been adequately consulted in accordance with legal and policy requirements.**
- **High risk of social isolation, emotional distress and ill-health** from loss of existing, long-term social networks, barriers to 'social integration' with the wider community when placed in new accommodation in the community, loss of service networks and attachment to familiar surroundings - these are very real risks in our experience in working with highly disadvantaged communities undergoing similar transitions, and the Crowle Home residents are arguably some of the most vulnerable and disadvantaged people in the community. The need for proper consultation and engagement in transition, relocation and service planning of residents and families is again noted as an important mitigative measure.

To address this, we **recommend the following principles underpin the Concept Plan**, noting that such principles would appear to be supported in government policy and research of good practice:

- **That all residents who wish or need to be accommodated on site as part of the redevelopment be provided with the choice to do so in accommodation and support arrangements that meets their individual care, health and social needs;**
- **That the detail the accommodation options that will be developed to rehouse those residents who wish or need to be relocated on site as part of the Concept Plan;**
- **That appropriate accommodation options be developed by the applicant in close consultation with Crowle Home residents, those recently relocated from Crowle Home, their families and/or other interested parties to ensure the best immediate and long-term outcomes for residents and their families;**
- **That onsite accommodation for the current residents is constructed as part of Stage 1 of the redevelopment. This will ensure that residents are rehoused with minimum disruption, dislocation and stress so as to minimise adverse social, emotional and health impacts;**
- **That detailed plans and protocols be developed and documented by the applicant in close consultation with Crowle Home residents, those recently relocated from Crowle Home, their families and/or other interested parties in relation to onsite and offsite service arrangements, consultation and community engagement, timing and staging of redevelopment, rehousing and transition arrangements for residents who remain on site and those to be relocated as part of the process, and OH&S during the redevelopment process, and that these plans and protocols be provided as part of the Concept Plan.**

NOTE: a more detailed review of likely individual social impacts from preliminary interviews and a review of policy and literature is provided in the table at the end of Section 5.

The key potential adverse **social impacts on the wider locality** arising from the redevelopment, and suggested mitigations, include the following:

- Impact of housing affordability from cumulative redevelopment within the locality - given the opportunities provide by this site, the serious need for affordable housing in the locality, and the fact that redevelopment is likely to contribute to upward pressure in prices in a cumulative way, it is **recommended that the applicant:**
 - Undertake research on the local housing market and need for affordable housing, or alternately review existing detailed research on this matter (see Section 6 below);
 - Provide more detail regarding the way in which this site could actively provide for 'affordable housing' in the locality;
 - Provide a target and mechanism for the delivery of affordable rental housing on site, specifying the target groups for whom such housing would be provided and the likely price points of units for sale or rent - for example, 5-10% of units created could be retained by Achieve and rented to clients and other low to moderate income households in the locality through a registered community housing provider at a rental cost that is affordable for these groups. The economic feasibility of this would need to be explored;
 - Use the provisions of SEPP (Affordable Rental Housing) 2009 to increase the number of permissible dwellings or to otherwise vary the development standards that would normally apply to increase the stock of such housing;
 - Consider innovative housing forms suited to low income students and key workers, such as boarding houses, as provided for in the SEPP. These would also be suited to lower support needs people with an intellectual disability if appropriately managed, and again aid with social integration.
- The loss in capacity for up to 90 secure, capital bedspaces in supported accommodation for people with a moderate to severe intellectual disability in Ryde LGA and Sydney SD more widely. As noted above, levels of disability in the locality are higher than average, and there is an identified shortage of appropriate, secure accommodation for people with an intellectual disability in the locality and metropolitan area more generally. This is a serious potential impact of the redevelopment in the locality, and a potential externality of the project. As noted above, currently, there is no detail provided in the SIA or EA on the expected capital return from the redevelopment of the site, and the extent to which existing and potential bedspaces in Crowle Home will be replaced with new capital housing stock. As such **we recommend that:**

- **Detail should be provided in the EA to ensure that there are no adverse impacts arising from the loss of secure, community-owned bedspaces in the locality for people with moderate to high support needs;**
- **The development of appropriate accommodation options to replace capital stock lost as a result of the proposed development. This will occur in close consultation with Crowle Hoe residents (current and recently relocated), their families and other interested parties. The Concept Plan should provide further detail on the accommodation options, number of dwellings, staging, timing and support arrangements that will replace the capital stock lost to ensure any adverse impacts in the wider locality are mitigated.**

1 Introduction

In June 2011, Judith Stubbs and Associates accepted a brief from Penklis Lawyers, who is representing a number of concerned parents and relatives of intellectually disabled clients living at Crowle Home, located at 76 Belmore Street, Ryde. Crowle Home is currently owned and operated by Achieve Australia, a not-for-profit, non-government service provider for intellectually disabled people. Achieve Australia has recently lodged a part 3A Concept Plan application for the redevelopment of the site for a multi-storey apartment complex and associated facilities.

JSA have been asked to prepare a report scoping the potential social impacts associated with the proposed closure and redevelopment of Crowle Home, and associated relocation of current residents into other forms of housing, and other relevant matters related to social impacts on current and future residents of Crowle Home and in the wider locality. JSA was also requested to review the adequacy of the EA and SIA in meeting the requirements of relevant Director General's Requirements (DGRs), specifically DGR 17 and DGR 18.

This introduction provides basic information about the proposed redevelopment of Crowle Home, relocation of existing residents and services and the DGRs that have been issued for the applicant related to consultation and impacts on existing and future residents.

1.1 Proposed Redevelopment of Crowle Home

The Crowle Home is a large residential centre for intellectually disabled people located at **76-78 Belmore Street, Meadowbank** (the site) in the City of Ryde local government area and the Inner North Sub-Region of the Sydney metropolitan area. The site, as shown in Figure 1 below, is comprised of six parcels of land and has frontages to Belmore Street (to the west), Porter Street (to the east) and Junction Street (to the north). For a more detailed site description, refer to Section 2.1.1 Locational Analysis.

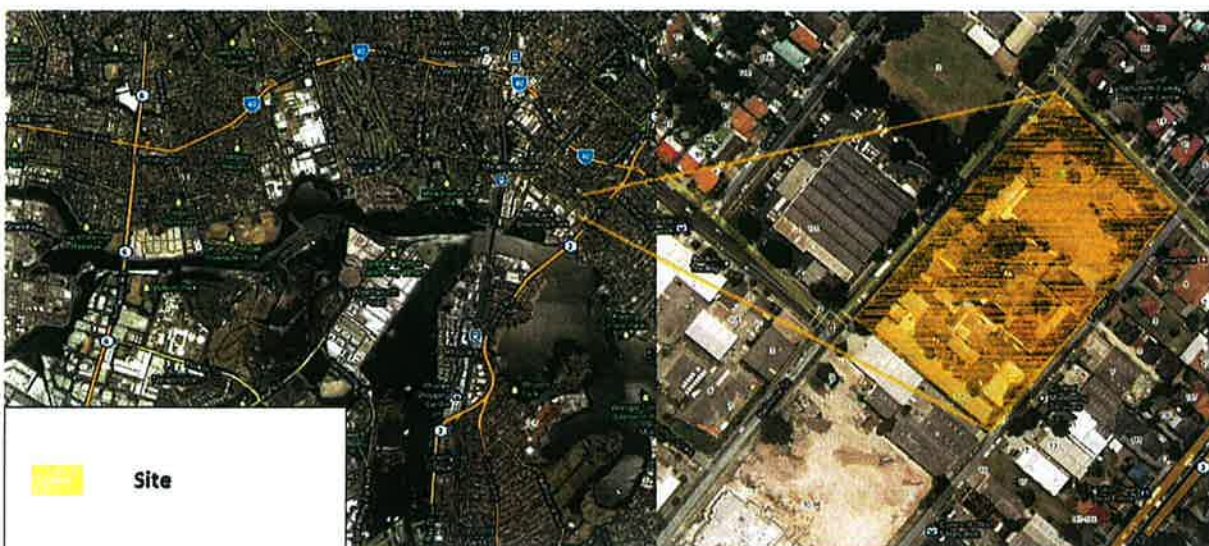


Figure 1-1: The Site, 76-78 Belmore Street, Meadowbank

Source: JSA 2011

Crowle Home is currently home to approximately 31 people with intellectual, sensory and physical disabilities with conditions that range from moderate to severe. Crowle Home is owned and operated by Achieve Australia Ltd, a disability accommodation and service provider funded by the NSW Department of Human Services - Ageing, Disability and Home Care (ADHC). Achieve Australia was formed in early 2009 from the merger of two non-profit disability accommodation and service providers, Hornsby Challenge and The Crowle Foundation.

In August 2011, Achieve Australia (the applicant) lodged a Concept Plan application with the NSW Department of Planning and Infrastructure under part 3A of the NSW Environmental Planning and Assessment Act (1979) for a residential flat building development at the site, comprising multiple buildings with basement car parking, open space areas and a recreation facility.² Multiple residential flat buildings will provide a maximum of 470 residential dwellings with the following indicative mix of dwelling types³:

- 225 x 1 bedroom dwellings
- 225 x 2 bedroom dwellings
- 20 x 3 bedroom dwellings

The project has an estimated value of \$155 million.⁴ The Environmental Assessment (EA) accompanying the application states that,

- “Achieve Australia proposes that the future accommodation development on the site will include some housing for people with disability.”⁵
- “Some residents may return to live in apartments on the site as stages of the development are completed.”⁶
- “10% of dwellings in the development will be built to AS4299 Adaptable Housing standards, enabling residents to ‘age in place’.”⁷

Apart from these statements, there are no additional details provided in the EA documents lodged in August 2011 regarding the description of the housing that will be made available on the site at Meadowbank for current Crowle Home residents and future clients of Achieve.

² Don Fox Planning (2011) Environmental Assessment Report, Part 3A Concept Plan Application MP10_110, Residential Flat Development, Pg 14.

³ Don Fox Planning (2011) Ibid, Pg. 15.

⁴ Don Fox Planning (2011) Ibid, Pg. 20.

⁵ Don Fox Planning (2011) Ibid, Pg. 70.

⁶ Don Fox Planning (2011) Ibid, Pg. 73.

⁷ Don Fox Planning (2011) Ibid, Pg. 75.

1.2 History of Crowle Home

Crowle Home was originally established as a rehabilitation centre for delinquent boys in 1944. The current function of the home commenced on 29 November 1952 and has operated as a residential facility for people with an intellectual disability since this time. In addition to the residential facility, associated classes (day classes) also operated at the site.⁸ Over time a number of additional buildings and facilities were constructed on the site, including additional accommodation buildings, a swimming pool and an assembly hall.

The Crowle Foundation came into existence on 15 March 1993, as the result of a devolution from the then-Challenge Foundation. The Challenge Foundation of NSW “devolved all management activities to individual branches [of which The Crowle Home was one; The Ryde Branch of the Challenge Foundation]. It encouraged all branches to incorporate and it transferred to each of those branches the properties the branch had been using in connection with its activities.”⁹

In 2008, the Crowle Foundation merged with the Achieve Foundation (the former Hornsby Branch of the Challenge Foundation) and adopted the name ACNewCo Limited. In 2009, ACNewCo changed its name the AC Foundation Limited, before again changing it to Achieve Australia Limited later that year.¹⁰ As mentioned, Achieve Australia Limited currently owns and operates Crowle Home and a range of other services in the Sydney area.

1.3 Management Structure

Prior to the merger that took place between Achieve Australia and The Crowle Foundation in 2008, Crowle Home was owned and managed by The Crowle Foundation. Though no official information on the management structure of the former Crowle Foundation was able to be accessed, conversations with former members throughout the interview process yielded valuable information.

The management structure of the former Crowle Foundation was understood to adhere to bottom-up, rather than top-down management principles. Through membership of the foundation, people were given the opportunity to sit on a number of steering committees, the role of which was to oversee various aspects of the operation of disability support services provided by the Crowle Foundation. These services included accommodation services, day programs, supported employment programs, transition to work programs etc. A member from each steering committee would be elected to sit on the board of management. Regular committee meetings were valued as a means to gather information about the operation of each of the services and provide input into the future direction of those services. In addition to regular committee

⁸ In 1978 the Association classes were assumed by the Department of Education, who developed a separate facility off site, and relocated the school.

⁹ Personal communication dated 16.06.2011

¹⁰ Personal communication dated 16.06.2011

meetings, members of the foundation were invited to attend twice yearly meetings in order to discuss issues affecting the organisation as a whole.

The merger resulted in the formation of a company – ‘ACNewCo’. Since this time, the company has undergone a number of name changes, and is now officially called Achieve Australia Limited. Achieve Australia is now responsible for the ownership and management of Crowle Home. As a result of the merger, The Crowle Foundation is now defunct, and membership to that organisation has been abolished.

The organisational structure of Achieve Australia is substantially different to that of the former Crowle Foundation. Information gathered during the interview process indicates that membership to the organisation is not available to family members of clients as it once was under the Crowle Foundation.¹¹

The management of Achieve consists of a Board of Directors and a number of management committees responsible for overseeing aspects of the organisation’s operations. There are presently four directors on the board, all of whom are volunteers. These positions are held by the following people:

- Ian Richmond
- Ian Rutter
- Dina Hayes
- John Cameron

The five management committees are:

- Audit & Risk Committee
- Finance Committee
- Property Taskforce
- Governance Committee
- Ethics and Clinical Governance Committee

Positions on these committees are primarily made up from the board members listed above, with the exception of Peter Sasse (Chief Financial Officer), who sits on the finance committee, and Professor Patricia O’Brien, who sits on the Ethics and Clinical Governance Sub-committee.¹²

The total membership of Achieve Australia is currently unknown. However, responses gathered during the interview process indicate that Achieve have restricted membership so that former members of the Crowle Foundation cannot apply to become members of Achieve Australia. This was confirmed at an information session conducted by Achieve Australia in relation to the Concept Plan exhibition on 8 September 2011. The issue was the subject of considerable concern as expressed by former members of the Crowle Foundation at this session, who expressed strong

¹¹ Interviewee 9 @ 18minutes

¹² Achieve Australia (2010). 2010 Annual Report: Achieving Social Inclusion

views about the lack of information provided by Achieve Australia, particularly compared with the operations of the organisation under the previous management body.

1.4 Proposed Relocation of Residents & Services

On-Site Residential Accommodation

Over the past few years, Achieve Australia has been in the process of relocating clients residing at Crowle Home to alternative supported housing arrangements located elsewhere in the community. Despite JSA's requests for information from Achieve Australia, it is unknown how many residents have been moved from Crowle Home into alternative accommodation in the community managed by Achieve Australia, nor exactly how the process of relocation was undertaken or what the outcomes for residents have been. Based on JSA interviews with family members of current and former Crowle Home residents and other stakeholders (reported later), we estimate that between 35 and 50 residents have been relocated from Crowle Home to date, with mixed results. As such, it would appear that the around 70-80 residents were accommodated on the site prior to active devolution, though the total number of bedspaces operating prior at maximum capacity may have been greater.

The total number and characteristics (age, gender, level of disability/care required) of clients in receipt of accommodation and day services provided by Achieve at Crowle Home is unknown, due to lack of information available from the organisation. However, those family members and other stakeholders interviewed for this study indicate that the 31 current Crowle Home residents are generally older and require a high level of care. As Interviewee 14 stated, *"The clients who reside or used to reside at the Crowle Home are older than most of the clients of Achieve, and will require aged care in the foreseeable future."*¹³

This appears to be supported in the SIA, which states that, *'Many of the residents have been there for most of their lives and are mature adults. The majority have moderate to severe intellectual disabilities, with a number having multiple disabilities such as sensory or physical disabilities'* (SIA, p 10). This is the only information provided on existing residents within the SIA, and requests for additional information JSA from Achieve during the course of our research were denied on several occasions. This makes the assessment of need, impact and appropriate mitigation for existing residents problematic, though we were able to gain valuable insights from the interviews undertaken with a range of stakeholders.

On-Site Day Services

Achieve Australia provides day service programs from the site, which assists clients to 'build meaningful life skills and connections to the community through facilitating their engagement in a range of activities such as; sports recreational activities, art, music, literacy and numeracy development.'¹⁴ It is our understanding that Achieve Australia is currently in the process of

¹³ Interview #14, conducted via telephone 13/07/2011

¹⁴ Don Fox Planning (2011) Ibid., Pg. 4-5

relocating its day service program to a recently purchased heritage property, Araluen at Brigadoon Court, in Epping.¹⁵ At the time of writing this report, day services were operating at the Crowle Home site, and it is understood that up to 100 clients are provided services from this facility.

Other services

In addition to accommodation and day services at the Crowle Home site, Achieve is responsible for administering a number of other disability services in the community including: accommodation support services comprised of community homes, group homes, drop-in support, co-residency, cluster housing, co-located, and alternative family placements / foster care program; leaving care; disability employment services; transition to work; specialist support and respite care (in development).¹⁶

On-Site Staffing

The number of staff currently working at the Crowle Home site is also unknown. Indications from interviews conducted suggest that the number of staff has reduced since the merger between the Crowle Foundation and Achieve Hornsby in 2008. It is not clear whether this is the result of the proposed redevelopment of the site and relocation of residents and services, or a separate management decision made by Achieve Australia.

2 Methodology

The purpose of this study is to scope the potential positive and negative social impacts associated with the proposed redevelopment of the Crowle Home site and the associated relocation of residents and services, particularly for the 31 people who reside at Crowle Home in a preliminary way, and to review the extent to which the applicant has addressed these potential impacts including in relation to relevant DGRs. In order to achieve this, JSA have undertaken a number of research activities including:

- A review of relevant planning policies;
- A review of the EA and supporting documents, particularly the SIA;
- A review of relevant disability accommodation and servicing policies, 'best practice' and current academic research regarding accommodation for people with disability;
- A series of 17 telephone interviews with key informants including family members of current and former residents of Crowle Home and other key informants;

¹⁵Achieve News, Autumn/Winter 2011, accessed online at: www.achieveaustralia.org.au/achieve_news.php

¹⁶ Achieve Australia (2011) Extraordinary Services Brochure, accessed 29/08/2011 at <http://www.achieveaustralia.org.au/services.php>

- A case study profile of a disability accommodation and service organisation recognized for its successful devolution from a Large Residential Care facility to group home accommodation within the community as a result of its consultation with clients and families throughout the process;
- A site visit and accessibility assessment of the Crowle Home site, particularly with regards to State Environmental Planning Policy (Housing for Seniors and People with a Disability) 2004 and Australian Standard 1428.1;
- A review of other relevant demographic and housing data in relation to the locality.

This section of the report provides a detailed explanation of the methodology that was carried out for this study.

2.1 Literature Review

JSA undertook a comprehensive review of a range of policies, plans, studies and other documents in order to better understand the context surrounding this proposal. These documents included:

- Relevant state and local planning documents and controls for the Council and the sub-region;¹⁷
- The Preliminary EA, current EA and associated documents (particularly the SIA) prepared for Achieve Australia by Don Fox Planning on exhibition with the NSW Department of Planning and Infrastructure from 24 August to 23 September 2011;
- Relevant NSW policy and planning documents pertaining to accommodation services for people with disability;¹⁸
- Publicly available Achieve Australia documents such as annual reports and quarterly newsletters;
- Relevant planning and policy documents from other disability accommodation and support services that have experience with the closure of Large Residential Centres and devolution to other models of accommodation and care; and
- A range of academic literature including longitudinal and comparative research into the effects of deinstitutionalisation, research documenting theoretical shifts informing the provision of services for people with intellectual disabilities, comparative studies into

¹⁷ City of Ryde (2010) Local Environment Plan; City of Ryde (2011) Local Environment Plan (draft); City of Ryde (2010) Development Control Plan 2010 Part 4.2: Meadowbank Employment Area Master Plan; NSW Government (2007) Draft Inner North Metropolitan Strategy; and NSW Government (2010) Sydney Metropolitan Strategy to 2036.

¹⁸ NSW Government (2006) Stronger Together Plan 2006-2016; NSW Government (2010) Stronger Together Plan 2006-2016: The Second Phase Report; NSW ADHC – Principles to Guide Services Planning for the Closure of Large Residential Centres; NSW ADHC (2009) Innovative Accommodation Support Options for NSW.

different accommodation models in the community and meta-studies compiling current research in the field of study.

2.2 Site Visit

JSA researchers conducted a site visit on Thursday, 28 July 2011, in order to:

- Carry out a detailed observation of the site and surrounds to inspect, access to the site, security, public transport and to gain a better understand of the broader locality of Ryde South more generally;
- Observe the site, surrounds and local services centres at Top Ryde Shopping Centre and West Ryde Marketplace; and
- Apply State Environmental Planning Policy (Housing for seniors and people with a disability) 2004 and Australian Standard 1428.1 access analyses to determine the suitability of the site for SEPP Senior Living style developments.

One significant limitation of this process was a lack of direct access to the site. As the site is private property, all observations were from the public footpaths surrounding the site, and internal observations could not be made. It is noted that JSA staff had previously sought an interview with senior staff of Achieve Australia on several occasions, through which staff would have also sought to gain access to the site. However, this was not granted.¹⁹

2.3 Interviews with Families & Other Stakeholders

JSA researchers conducted interviews with seventeen people deemed to be key stakeholders in relation to the proposal and relocation of residents, from 4 to 21 July 2011. Interviews were semi-structured, using trigger questions on key issues, and generally took between 30 to 45 minutes to complete. Notes were taken during the interviews, and interviews were recorded so that the responses to questions could be checked during the writing of this report.

Seven groups of stakeholders were identified prior to the interview process, and JSA aimed to carry out interviews with representatives from each group. These groups are:

- Volunteers and former members of the Crowle Foundation. These individuals are not related to any clients currently receiving services from Achieve Australia, but have knowledge of the history of the site, services provided and management due to their previous involvement with Crowle Home and the Crowle Foundation.
- Parents and/or family members of Achieve Australia clients who are currently:
 - Receiving accommodation support at Crowle Home;
 - Receiving accommodation support elsewhere in the community through Achieve Accommodation Services; or

¹⁹ Personal communications dated 14, 19 & 22 July 2001 and 24 August 2011.

- Receiving other disability services from Achieve.
- Former Achieve and/or Crowle Foundation staff
- Current Achieve staff (direct support workers and residential managers)
- Current Achieve management staff
- Disability Advocacy Group Representatives
- Representatives from other disability service providers

As each group had different information to provide with regard to the proposed redevelopment and relocation of residents and services, different interview questions were prepared for each group. To give an indication of the nature of questions posed to each group of interviewees, an interview schedule is set out in the table below.

Table 2-1: Interviewee types and questions

Group	Interviewee Type	No of Interviewees ²⁰	Questions
1	Parents/guardians/siblings of Achieve clients still living at Crowle Home	4	Details about the client (level of disability; age; gender; how long they have lived at the home etc); experience and involvement with the Crowle Foundation and Achieve Australia; involvement in decision making; awareness of proposal; communication/consultation with Achieve Australia; views regarding relocation.
2	Parents/guardians/siblings of Achieve clients relocated to accommodation in the community	5	Details about the client (level of disability; age; gender; how long they have lived at the home etc); experiences and involvement with the Crowle Foundation and Achieve Australia; involvement in decision making; experience of the relocation process; positives/negatives of living in the community.
3	Former CF board members	5	Role/involvement on board; perception of the merger; perception of the redevelopment proposal.
4	Achieve/Crowle Foundation – former staff & volunteers	3	Role within the organisation; length of employment; current contact with residents/family/staff members; knowledge of the proposal; knowledge of consultation procedure; knowledge of relocation procedure; effects of relocation; experiences of relocating residents Staff roles in relocation process; staff ratios pre/post relocation.
5	Relevant spokespeople from similar service providers and government departments	2	Experiences relating to similar closures/relocations; consultation procedure undertaken; experience of resident and family concerns; and best practice and guidelines/standards.

Source: JSA 2011

As mentioned, it was JSA's intention to conduct interviews with representatives from each of the interviewee groups described above. However, there were some groups from which we were unable to secure participation despite several requests, particularly current Achieve Australia staff and management.

JSA requested an interview with the CEO of Achieve Australia, in order to better understand the proposal and process of relocation from the organisation's point of view. This request was responded to by a representative from Prolegis lawyers, on behalf of Achieve Australia, requesting more information about the interview. At the time of writing, JSA have yet to receive further contact from either Prolegis Lawyers or Achieve Australia regarding this interview. We acknowledge that a shortcoming of this study is the lack of detailed information provided by the applicant, particularly with regard to its consultation practices and more detailed information about its plans for relocation and service planning for existing Crowle Home residents. As such, we have relied upon the various accounts of those interviewed, and consider that the applicant may wish to provide more information at a later stage.

²⁰ Two former Crowle Foundation board members were also parents or family members of Achieve clients living at Crowle Home, hence they have been included twice in table 2-1.

3 Metro, Sub-Regional & Local Planning Context

This Section provides a broad planning context for the proposal. It describes the area surrounding the site and locates the proposal in the context of local and subregional strategic planning documents such as the Metropolitan Plan for Sydney 2036 and the Inner North Metropolitan Strategy.

As one of the main purposes of the site visit was to determine the compliance of the site with two planning standards – SEPP SL (2004) and AS1428.1 – our review against these standards is also included in this Section of the report.

3.1 Metropolitan Plan for Sydney 2036

The *Metropolitan Plan for Sydney 2036* emphasises the need for additional housing in the city, based on a fast-growing population, and also the increasing need for housing that is suitable for seniors. The *Plan* states that ‘Sydney’s population is expected to grow by 1.7 million people between 2006 and 2036 to 6 million – an average annual rise of 56,650’. It also states that ‘Sydney will need 770,000 additional homes by 2036 – a 46% increase on the city’s current 1.68 million homes’. ‘By 2036, the number of people aged 65 and above will more than double to just over one million, requiring new, more varied housing, social infrastructure and community services.’ These additional homes should be ‘a range of housing types, sizes and affordability levels for a growing and ageing population’ and ‘at least 70% of new homes [should be located] in existing suburbs and up to 30% in greenfield areas’. It also states that there is a ‘need to encourage development of a greater proportion of smaller new homes’.

The *Plan* states that ‘[e]quity, liveability and social inclusion have been elevated to strategic directions in their own right in this Metropolitan Plan’. It ‘aims to promote equity and social inclusion in the Sydney region and to ensure the quality of life, health and wellbeing within the city – its liveability – is always improving’. Therefore, it is important to ensure access to ‘appropriate and affordable housing and physical and social infrastructure’, to ‘consider the specific needs of particular groups of people’, and to ‘ensure appropriate social infrastructure and services to foster social networks and social capital’. In terms of ‘[a]chieving equity, liveability & social inclusion’, it is important to ‘[c]onsider social impacts in planning and assessment’, ‘[p]rotect places of special cultural, open space and heritage value’, aim for ‘improved liveability’ and ‘[s]et affordable housing targets for State urban renewal projects on a case by case basis’. ‘A range of intangibles also contribute to liveability – a sense of the past and heritage, engagement in decision-making and connections with community and social support networks.’²¹

²¹ NSW Government (2010) *Metropolitan Plan for Sydney 2036*.

3.2 Inner North Metropolitan Strategy

The *Inner North Metropolitan Strategy* notes that 'Ryde is 13.5km from Sydney CBD and had a population of 99,800 in 2004 and a land area of 40.5km². It is set in scenic surrounds bordered by Parramatta and Lane Cove Rivers. Whilst the area is primarily residential it contains a number of important employment areas, including the Macquarie Park Specialised Centre.' It also notes that in 2004 there were 129,000 dwellings in the Inner North, housing 298,000 persons. The target is for this to reach 159,000 by 2031, an increase of 30,000 dwellings over 27 years or approximately 1,100 per year. In Ryde LGA, a target of 12,000 additional dwellings between 2004 and 2031 is set, which equates to around 450 additional dwellings per year.

The *Strategy* emphasises the need to 'improve housing choice', 'create sustainable and liveable communities', and 'provide opportunities for communities to "age in place" given the substantive ageing of the resident population projected within the Inner North by 2031'. It states that '[o]ver the next 25 years, State Government and councils will plan for a greater range of housing forms to suit changing demographics'. The *Strategy* also emphasises the need to 'improve the affordability of housing in general' and specifically regarding 'the most vulnerable households—the frail aged, people with disabilities, people with mental illness and people at risk of homelessness—who face poor health, educational or other social outcomes due to high housing costs or overcrowding'.

3.3 Local Context²²

The subject site is located in a B4 (Mixed Use) Zoned Area, and borders an R2 (Low-Density Residential) Zoned Area to the north under the Ryde Local Environment Plan 2010 (RLEP 2010). The B4 Zoned Area in which the subject site is located (the Meadowbank Employment Area) is bordered to the west by the rail line, to the east by Church Street, to the south by the Parramatta River, and to the north by Constitution Road and Junction Street. This has remained unchanged in the Draft RLEP 2011 Maps.

According to RLEP 2010 Maps, the maximum height of buildings allowed on the site is 9.5m, which equates to a maximum of two storeys²³. However, in the maps relating to the Draft LEP 2011, the maximum heights of buildings allowed on the site has been increased to 15.5m (4 storeys) for the north-eastern lot and 21.5m (6 storeys) for the remaining lots. The allowable height of buildings on many of the other blocks in the Meadowbank Employment Area has also increased substantially in the Draft LEP 2011, though the allowable height in the adjacent Low-Density Residential area has remained largely unchanged at 9.5m.

It appears that the increase in allowable building height in the Meadowbank Employment Area from RLEP 2010 to Draft RLEP 2011 may be in large part due to a submission lodged by Achieve Australia to Ryde Council on 28 January 2009, since Achieve Australia already had

²² As per Ryde LEP 2010 – Land Zoning Maps, Height of Building Maps and Floor Space Ratio Maps

²³ DFP Planning Consultants – Preliminary Environmental Assessment – Concept Plan Application, Section 3.1

plans to redevelop the site prior to this time. Achieve Australia have preliminary plans to construct residential units of up to 8 storeys (27.5m in height) on the subject site, and appear to be seeking approval from Ryde Council to exceed the maximum height given in its LEP, based on reasons given in DFP Planning Consultants – Preliminary Environmental Assessment – Concept Plan Application, Section 7.3.

No maximum floor space ratio is given in the RLEP 2010 Maps, nor for the other lots in the Meadowbank Employment Area. However, in the Draft LEP 2011, the maximum floor space ratio for the north-eastern end of the subject site, as well as for the majority of the blocks in the Meadowbank Employment Area, is 2.0:1, and for the southern end is 2.3:1.

It is noted that the application for the proposed Concept Plan under Part 3A of the Act would appear to have the effect of setting aside the provisions of the local EPs in any case.

3.4 Meadowbank Employment Area Master Plan

Crowle Home is located in the Meadowbank Employment Area, the boundaries of which are set out above. The *Meadowbank Employment Area Master Plan* views the area as a ‘focus for employment’ with ‘a mix of employment, residential and recreation land uses with minor support retailing’, and ‘while medium density residential development will be a significant feature of the area, it will not dominate’. ‘Commercial and light industrial uses will be encouraged’. The *Master Plan* highlights the importance of creating a built form that ‘fosters a robust ... social environment’, and creating ‘a social infrastructure which provides for a mix of housing opportunities, supporting services and facilities’.

The *Master Plan* sets out several urban design principles, including the need to ‘protect the existing scale of the built environment’, ‘respect the height, bulk, rhythm and scale of the existing neighbourhood and topography’, and to ‘re use and adapt existing buildings wherever possible’. ‘[D]evelopment will need to accommodate existing uses, and occur in a manner that protects the amenity of existing residential areas and preserves elements considered being of cultural ... significance.’ It notes that the Meadowbank Employment Area should ‘[b]e a place with a high level of aesthetic amenity at street level’. Buildings should be ‘not monolithic nor bulky’ and should ‘[p]rotect and enhance the treed ridge line above the Meadowbank Basin by ... not visually encroach[ing] on it’.

3.5 Site Visit & SEPP Seniors/AS 1428.1

3.5.1 Overview

JSA researchers conducted a site visit on Thursday, 28 July 2011. With respect the assessment of the site’s suitability for seniors and those with a disability, the purpose of the visit was twofold: 1) to conduct a locational analysis of the site and immediate surrounds, including access to public transport and services in the local area; 2) to conduct State Environmental Planning Policy (Housing for Seniors and People with a Disability) (2004) (SEPPSL 2004) and Australian Standard 1428.1 access analyses of the site and of local service centres at Top Ryde Shopping

Centre and West Ryde Marketplace with respect to service accessibility. These locations are shown in Map 1 below.



Map 1: Site and Local Service Centres

Source: Google Maps 2011, JSA 2011.

3.5.2 Locational Analysis

The site is located at 76 Belmore Street, Ryde. Approximately 300 metres north of the Parramatta River, Crowle Home sits between substantial low and medium density residential areas to the North, Northwest and East, while there is considerable light industrial land use to the South and Southwest.

The site has good access to public transport. Meadowbank train station and wharf are both located approximately one kilometre to the west. There are two bus stops in close proximity to the site, which are service by the Route 507 City – Macquarie University route and the "TopRyder", a community bus service specifically provided for elderly and less mobile travellers. The TopRyder bus runs a loop service, stopping at a number of retirement villages, train stations and shopping centres in the Ryde area. The locations of the public transport access points and their distance from the site are presented below.



Figure 3-1: Public Transport Locations

Source: Google Maps 2011; NSW Transport 2011

Table 3-1: Public Transport Locations and Distances

Location	Distance
Meadowbank Train Station	1000 metres via Constitution Road and Railway Road
Meadowbank Wharf	1,100 metres via Constitution Road and Bowden Street
Constitution Road bus stop	70 metres via Belmore Street and Constitution Road
Belmore Street bus stop	20 metres via Belmore Street

Source: Google Maps 2011

Logically, the most accessible form of transport for residents at the site is either of the buses stopping on Constitution Road or Belmore Street. Local services can be accessed at a number of shopping centres in the Ryde area which lie on the TopRyder route. These centres include:

- Gladesville Shops
- Woolworths West Ryde, Anthony Street (West Ryde Marketplace)
- Shepherds Bay Shops
- Top Ryde City

The service also stops at Ryde Hospital Emergency Department.²⁴

²⁴ Top Ryde City (2011) Top Ryder Timetable. Accessed 26/11/2011 at <http://www.toprydecity.com.au/trc/gettinghere/gh-trc-bus-stop.php#>

3.5.3 SEPP SL (2004)/AS 1428.1 Accessibility and Service Analyses

Overview

Due to the strategic importance of increasing the supply of well-located housing for older people and those with a disability, the target group of Achieve, and the opportunities provided by a large community-owned redevelopment site, an assessment was conducted by JSA of the site's compliance with SEPPSL 2004, and the relevant Australian Standard.

In summary, the site is well-suited to a development for older people (including frail aged) and people with a disability under SEPPSL 2004. It has excellent access to public transport, with such transport linked to service centres providing the full range of services likely to be required by these target groups, and suitable topography and pathway linkages. The site itself also appears highly suitable for this form of development on, for example, a portion of the site.

The subject site thus provides an important opportunity to increase the stock of such accommodation in an established urban environment, which can meet the needs of the target groups and make use of existing infrastructure and services, and is thus also in line with the objectives of SEPPSL 2004 and the strategic planning objectives of government as expressed in the Metropolitan Plan and relevant Sub-Regional Strategy.

Assessment Overview

As part of our research, JSA conducted separate analyses of the site surrounds, access ways to public transport and two of the above shopping centres (Top Ryde City and West Ryde Marketplace), in order to assess their compliance with the access and service availability requirements under SEPP SL (2004) and AS 1428.1 guidelines, the stated aims of which are as follows:

SEPP SL (2004)

- 'The objective... is to create opportunities for the development of housing that is located and designed in a manner particularly suited to both those seniors who are independent, mobile and active as well as those who are frail, and other people with a disability regardless of their age...
- (1) This Policy aims to encourage the provision of housing (including residential care facilities) that will:
 - a. increase the supply and diversity of residences that meet the needs of seniors or people with a disability;
 - b. make efficient use of existing infrastructure and services, and;
 - c. be of good design.'²⁵

AS 1428.1 (2001)

²⁵ State Environmental Planning Policy (Housing for seniors or people with a disability) 2004.

- ‘The requirements specified in this standard are intended to permit general use of buildings and facilities by people with disabilities acting independently or, where a person’s usual method of operation is with an assistant, in the company of that assistant.’²⁶

In order to conduct the analyses, JSA developed a checklist containing the relevant clauses in each of the documents, as well as the criteria specified in each clause. Details of the assessment are provided in Appendix A.

JSA also conducted a service availability analysis in accordance with the guidelines set forth in SEPP SL (2004). Again, a checklist was developed and applied to the two service centres identified above (Top Ryde Shopping Centre and West Ryde Marketplace). These centres were chosen as they were easily accessible via the Top Ryder bus service described in section 3.5.1 above. Again, details of the assessment are provided in Appendix A.

The results yielded by the analysis indicate that the site surrounds comply, for the most part, with the guidelines in SEPP Senior Living (2004) and AS1428.1.

In summary, the site is well-suited to a development for older people (including frail aged) and people with a disability under SEPPSL 2004. It has excellent access to public transport, with such transport linked to service centres providing the full range of services likely to be required by these target groups, and suitable topography and pathway linkages. The site itself (though access could not be gained) appears from a desktop analysis to be relatively level, providing good access for the target groups across the site.

In a strategic sense, the site is located within a locality with a relatively high proportion of older people and those with a disability (see SIA, pgs 18, 20, 38), with the proposed development expected to significantly increase the number of those aged 55+ years in the locality (see SIA, pgs 48-49). The applicant’s SIA also notes that there is ‘an identified need for accommodation and support services for people with a disability’ which is ‘currently significantly undersupplied in the Sydney Region’ (SIA, p 2). As discussed below, the LGA has also been assessed in previous research and planning work by JSA for City of Ryde Council as having a current and projected under-supply of low- and high-care places for older people and those with a disability (e.g. hostels, serviced apartments with Community Aged Care or Extended Aged Care Packages, or nursing homes), though there appear to be some discrepancy with the applicant’s SIA in relation to high care (nursing home) places (p 48). As previously mentioned, both the Metropolitan Plan and the Sub-Regional Strategy note the priority for an increase in housing for seniors, people with a disability and others with special needs, including as a matter of ‘equity liveability and social inclusion’.

²⁶ Australian Standard 1428.1 (2001). Design for access and mobility – General requirements for access – New building work.

4 Disability Policy & Research Context

4.1 Overview

This section reviews recent trends in academic research and government policy relating to good practice in the provision of accommodation and services for people with intellectual disabilities, in the Australian context.

Key documents guiding reforms to service provision are identified and briefly reviewed, namely:

- NSW Government Stronger Together 2006-2016 policy
- NSW Government's Innovative Accommodation Framework
- NSW ADHC policy documents
- NGO and advocacy group documents

Relevant to the current proposal, there are a number of accommodation and support options supported by government policy that are likely to be appropriate for remaining Crowle Home residents and those recently relocated as well as others currently serviced by Achieve Australia, which would provide for a diversity of needs and preferences. These include Village Models and cluster housing, groups homes for older people and those with higher support needs, as well as villas and apartments (for example, with flexible or drop in support) for those with lower support needs. There would appear to be the potential for these various forms of accommodation and support options to be explored and potentially factored into the planning and development process for the Concept Plan for the subject development, though the current type of housing planned does not appear to provide for such options. Some medium density development of the site would also provide for a wider range of housing needs, including for those with more complex or challenging needs or behaviours. Moreover, it is understood that one model of housing and support does not suit everyone, and the focus needs to be on individual needs and preferences.

Importantly, government policy clearly states that consultation is regarded as a vital part of the process of transition to different types of living arrangements, the form that such accommodation may take, and the relocation of residents to different forms of accommodation and support arrangements, particularly where this involves people who have lived for most of their lives in such institutional settings. Key policy documents note that people with disabilities (and their families) should be empowered to make informed decisions; offered choice and flexibility in funding and support; and recognised as the 'primary determiners' with respect to care and support arrangements.

In addition to reviewing recent developments in NSW disability policy, this Section presents a number of findings from the academic literature of the last 30 years in support of deinstitutionalisation and various forms of community living, as well as recent research which highlights the importance of person-centred planning, consultation of implementation throughout the deinstitutionalisation process.

The academic research generally advocates a shift to community-based service provision on the grounds of better outcomes in a number of areas. Such literature indicates that quality of life indicators are generally improved with the move from large institutions. Though earlier research in the field suggested a positive link between client outcomes and a relocation to dispersed housing in the community, recent findings suggest that a number of organisational factors can contribute to the successes and shortfalls of projects in devolution. Among these are: staff turnover; staff skills sets; organisational aspects; the transition process; underutilisation of community resources, and; time/resource constraints. Moreover, they note significant limitations to research methodology, and the extent to which some results can be relied upon.

More recent studies also suggests that in some instances, deinstitutionalisation can lead to reduced social networks, and other negative effects on community participation and social integration. Variable results are evident, and again likely to be due to a range of factors in the transition process as well as the living arrangements of various accommodation providers. The literature also indicates that 'physical integration' often does not translate to genuine 'social integration' when people with an intellectual disability are moved from large residential facilities, and that the major support and friendship networks are generally limited to family, carers, other people with a disability, and relatively few other contacts. Again, a number of community housing options provide for good practice in the literature, though there is ongoing debate about the outcomes of some of these forms of accommodation and support. Consultation is again regarded as a critical component of any changes in living and support arrangements.

4.2 Current NSW Disability Policy Context

There are a number of relevant reports, service planning and policy documents which provide a context to and should guide the proposal. Among these are:

- The NSW government's *Stronger Together Plan 2006-2016*, which commits to the scheduled closure of all large residential centres over time;
- the NSW ADHC's *Innovative Accommodation Support Options for NSW* and the associated Innovate Accommodation Framework;
- The NSW government's *Stronger Together Plan 2006-2016: Second Phase Report*;
- NSW ADHC's *Principles to guide service planning in large residential centres*;
- NSW Ombudsman's *Review of individual planning in ADHC large residential centres (2009)*;
- NSW Ombudsman's *People with disabilities and the closure of large residential centres (2010)*;
- NSW ADHC's *Individual planning: Policy and procedures (2005)*

- NSW ADHC's *Allocation of Places in Supported Accommodation: Policy and Procedures* (2009)

These documents represent a shift in disability service provision emphasising a person-centred approach to disability support. Such an approach emphasises the importance of recognising disabled people's individual needs and goals. In order to provide a supportive environment through which these needs can be met and goals realised, a number of policies and procedures have been developed. These include:

- The planned closure of all large residential centres (LRCs);
- Relocation of residents living in LRCs to a range of what is considered to be more appropriate accommodation located in the community (as set out by the innovative accommodation framework);
- Development of transition plans to assist in the relocation of these residents into new accommodation;
- Development and implementation of individual plans (IPs);
- Increased access to information and advocacy support for people with intellectual disabilities; and
- Increased communication and consultation with residents and their families/guardians.

Stronger Together 2006-2016

In 2005, the NSW government announced *Stronger Together: a new direction for disability services in NSW*,²⁷ with the aim of reforming the disability services sector in New South Wales over the ten year period from 2006 to 2016. A key driver of the policy reform was to increase the capacity of people with a disability to live in the community, through the introduction of new and innovative accommodation support options.²⁸ For young people, this means growing up in a family in the community. For mature and elderly people, it means deinstitutionalisation and living independently in the community to the extent possible.

As part of the *Stronger Together* plan, in 2009 the NSW Government released *Innovative Accommodation Support Options for NSW*.²⁹ The paper outlines the need to move away from the rigidity of the then-current situation, whereby the primary forms of accommodation and support services existed as residential centres and group homes, the justification being that increased diversity in housing choice better enables client needs to be matched with service types.

In order to achieve this, the paper advocated an Innovative Accommodation Framework (IAF), expanding the range of accommodation support models available to people with a disability in order to increase accessibility, flexibility and choice. The eleven accommodation models

²⁷ NSW ADHC (2005) *Stronger Together: A new direction for disability services 2006-2011*.

²⁸ ADHC (2009). *Innovative Accommodation Support Options for NSW*.

²⁹ NSW DADHC (2009). *Ibid*.

proposed are: large residential centre (LRC) model, village model, cluster model, villas and apartments, co-located models, group homes, flexible packages, alternative family placement, drop-in support, in-home support/attendant care, and boarding houses. Though large residential centres are included in the models covered by the IAF, the paper acknowledges the NSW Government's commitment to the gradual closure of these facilities. The accommodation options presented in the IAF are presented in table below, including an overview of the target groups suited to each and a basic description.

It is noted that a number of the accommodation and support options listed below are likely to be appropriate for remaining Crowle Home residents and those recently relocated as well as others currently serviced by Achieve Australia. These include village models and cluster housing, groups homes for older people and those with higher support needs, as well as villas and apartments (for example, with flexible or drop in support) for those with lower support needs. Data available from the NSW ADHC 2009/10 annual report indicates that in NSW there are 1710 people living in large residential centres across NSW, 3880 live in group homes, and 2555 receive other forms of accommodation support, including in-home support (ADHC 2010).

A range of such accommodation options is likely to cater for the range of needs and preferences that people with a disability and their carers or guardians may have. There would appear to be the potential for these various forms of accommodation and support options to be explored and potentially factored into the planning and development process for the Concept Plan for the subject development, and these should be developed in close consultation with residents, families and other stakeholders.

Unfortunately this does not appear to be the case at the present time (see for example comments in the applicant's EA and SIA that report that 'a number of units' may be retained on site for Crowle Home residents, whilst the Concept Plan only makes provision for dwellings of up to 3 bedrooms at this stage, with the vast majority and 2-bedroom units (group homes, for example, would generally be 4-5 bedrooms). Some medium density development of the site would also provide for a wider range of housing needs, including for those with more complex or challenging needs or behaviours.

Table 4-1: IAF Summary Table

Accommodation type	Level of need	Level of care provision	Capacity	Notes
Large Residential Centre	Variable	24 hour	> 20	IAF notes the NSW Government's commitment to closure of LRCs over time.
Village Model	Aged/ disabled	24 hour	80 to 100 residents in 5 – 10 bed units	One to three bedrooms, accommodating six to ten clients
Cluster Model	High	24 hour	20 to 50 residents in 5 – 10 bed units	Provides access to specialist services and nurses where appropriate. Examples include the Grosvenor and Lachlan Centres.
Villas and Apartments	Not specified	24 hour	6 to 10 residents in 1 – 3 bedroom units	Located in close proximity (either on one or multiple sites). Designed for all ages excluding children.
Co-located Models (see notes)	Variable (see notes)	24 hour	5 – 10 bedrooms under 1 or 2 rooflines	Recommended for clients exiting the criminal justice system, and with behavioural support needs.
Group Homes	Variable	24 hour (or less)	5 bedrooms	Provides accommodation support for all ages. Also accommodates people with challenging behaviours, complex health needs and those exiting the criminal justice system.
Flexible Packages	Low to high	24 hour (or less)	Individual package	Includes a number of services depending on individual client need. Further work to be undertaken by DADHC to determine scope, costs and requirements.
Alternative Family Placement	Low to high	24 hour	Not specified (see notes)	Accommodation support is provided through placement in an <i>alternative</i> family's private home (i.e. not the client's family). This option is designed for children and young people.
Drop-in support	Low to moderate	Up to 35 hrs/week	5 to 10 places in close proximity	Drop in support is available to clients living in all types of accommodation (i.e. the range of accommodation available to the general community). Designed for low to

In-home support /attendant care	Low to moderate	Up to 35 hrs/week	Own home	moderate needs clients who require 'some supervision'.
Boarding Houses	Low	Not stated	Privately owned and operated boarding homes	Designed for less dependent people with higher levels of decision making.
Other models	-	-	-	Number of houses is decreasing due to attrition. Not specifically designed to accommodate intellectually disabled people and hence only accommodates those with low needs and relatively high levels of independence.
				"It is expected that the range of models within the Framework will expand over time as new models are developed in Australia and internationally." ³⁰

Source: NSW DADHC (2009)

³⁰ NSW ADHC (2009), Pg. 5