

Members' Library Service Request Form

Date of Document	26/03/24
Originator	Wendy McGuire
Originator's Ref (if any)	
Document Title	Scottish Government Consultation on Enhancing the accessibility, adaptability and usability of Scotland's homes

Please indicate if access to the document is to be "unrestricted" or "restricted", with regard to the terms of the Local Government (Access to Information) Act 1985.

Unrestricted	<input checked="" type="checkbox"/>	Restricted	<input type="checkbox"/>
--------------	-------------------------------------	------------	--------------------------

If the document is "restricted", please state on what grounds (click on grey area for drop-down menu):

For Publication

Please indicate which committee this document should be recorded into (click on grey area for drop-down menu):

Cabinet

Additional information:

Authorised By	Lesley Brown
Designation	Exec Director for Education & Child
Date	04/04/24

For Office Use Only:	
Library Reference	39/24
Date Received	05/04/24
Bulletin	Apr 24

REPORT TO: Members' Library Service

MEETING DATE:

BY: Head of Housing

SUBJECT: Scottish Government Consultation on *Enhancing the accessibility, adaptability and usability of Scotland's homes*

1 PURPOSE

- 1.1 To note the submission of a response to the Scottish Government's consultation on ['Enhancing the accessibility, adaptability and usability of Scotland's homes'](#).

2 RECOMMENDATIONS

- 2.1 Members are asked to note the contents of this report and the Council's response to the proposals set out in the Consultation Paper. The response can be found in the Background Papers attached to this report.

3 BACKGROUND

- 3.1 In 2021 the Scottish Government published [Housing to 2040](#) (H2040), delivering Scotland's first long term housing strategy. As part of H2040, the Scottish Government has included aims to improving guidance and standards on the accessibility of homes.
- 3.2 This consultation is split into two parts. Part 1 is reviewing the Housing for Varying Needs (HfVN) guidance. This guidance sets out how to design homes as suitable as possible for people with different abilities. Local Authorities and Registered Social Landlords typically build all housing to HfVN standards. East Lothian Council develop all new build homes according to this guidance. HfVN is not followed by housebuilders in the private/market sector.
- 3.3 Part 2 of the consultation introduces a 'Scottish Accessible Homes Standard' that should be followed by all housebuilders in the future to improve the accessibility and adaptability of all homes and close the gap between private and affordable homes.
- 3.4 The Housing for Varying Needs guide was published in 2002 and has not been updated since. A number of standards which originated from HfVN

have since been adopted in legislation through changes to Building Standards.

3.5 HfVN is a very extensive document totally 230 number of pages. Likewise, this consultation spanned 371 number of pages. A very broad summary of changes are:

- Part 1:
 - Removal of wider information and written definitions to make HfVN more technical.
 - Information already transposed into Building Standards are to be removed from HfVN as they're now considered as a standard across all new housing developments.
 - Range of changes to improve accessibility for general needs and wheelchair accessible housing including:
 - Increasing door widths, landing areas and circulation spaces.
 - Additional space considerations for future wet floor shower conversions.
 - Removal of guidance on retrofitting existing homes.
- Part 2:
 - Transpose current general needs housing design criteria from HfVN into Building Standards where possible.
- Impact Assessments
 - Various impact assessments were considered as part of this consultation: Equality Act 2010; socio-economic disadvantaged; Children's Right and Wellbeing; Rural Island Communities; Business and Regulatory Impact Assessment.

3.6 Consultation Response

3.7 The consultation response from East Lothian Council was prepared by Housing Strategy & Development with a collaborative input from

- Housing Services: Occupational Therapists in Community Housing
- Children's Services: Children's Wellbeing
- East Lothian Health and Social Care Partnership: Adult Wellbeing: Community Care, Occupational Health

3.8 **Part 1** – The removal of wider definitions and explanations is not supported. It is considered a vital loss in information. Some services rely solely on information provided in HfVN. Whilst the transposition into Building Standards is welcomed, details should also remain in HfVN.

- 3.9 In principle changes in accessibility standards are welcomed and considered reasonable and acceptable. Some changes in technical details were suggested within the response which can be found in the attached Background Paper – Consultation Response.
- 3.10 Across the consultation concerns around cost implications are highlighted. The proposed changes will result in increased floor areas. This will have a knock-on effect on land values, cost of building and lead to a potential reduction in the number of homes being developed for the social sector.
- 3.11 Stronger regulations around the provision of storage space; at home office space; space for wet floor shower conversions; and better ventilation were requested to be included. Some of these space implications have been neglected for years and have had a negative impact on people’s quality of life. The need for more information on designing homes for disabled children is also highlighted throughout the response.
- 3.12 East Lothian Council retrofits council homes to the existing HfVN standards as best as possible within the means of structural and financial feasibility and viability. The development of better accessible and adaptable housing has a considerable impact on future adaptations. This intrinsic connection needs to be acknowledged at all times. Therefore, the removal of retrofitting guidance in the future is not supported and should be updated accordingly.
- 3.13 **Part 2** – Improvements to the accessibility of private built homes is welcomed. However, the continued two-tier approach to accessible housing provision is not supported. We believe that this approach does not support tenure neutral development and continuous to put a greater burden on local authorities and social landlords than private sector providers. Continuous budget cuts for social landlords is significantly limiting current investment in new build housing without the necessary changes in market housing. This is not considered sustainable.
- 3.14 **Impact Assessments** - The response notes that impact assessments are required to be much more detailed regarding the Equality Act 2010, protected characteristics, and children. Impact assessments acknowledge that less homes would be built due to the cost implications of making homes more accessible. No mitigation measures are mentioned, e.g. increased funding provision by the Scottish Government. In the light of existing housing pressures and lack of affordable housing in East Lothian, this is not considered an acceptable response.
- 3.15 The Business and Regulatory Impact Assessment has not considered the long-term maintenance costs of the proposed changes. For example, through floor lifts, lighting in kitchens and painting requirements will increase maintenance costs. These costs need to form part of the business impact assessment.

4 POLICY IMPLICATIONS

- 4.1 There are no implications on Council policies arising from this consultation.
- 4.2 Should the changes in guidance for Housing for Varying Needs be adopted and result in changes in policy and practise in East Lothian; then changes will be reported on within annual updates in the Local Housing Strategy, the Strategic Housing Investment Plan, or additional Member Library Reports.

5 INTEGRATED IMPACT ASSESSMENT

- 5.1 The subject of this report does not affect the wellbeing of the community or have a significant impact on equality, the environment or economy.

6 RESOURCE IMPLICATIONS

- 6.1 Financial – Should changes be adopted then this will have resource implications on the delivery of affordable homes in East Lothian. It will likely result in a reduction of affordable homes being built unless additional funding from the Scottish Government is being made available. Any changes in delivering affordable homes will be reported on in the annual Strategic Housing Investment Plan.
- 6.2 Personnel - None
- 6.3 Other – None

7 BACKGROUND PAPERS

- 7.1 Consultation Response

AUTHOR'S NAME	Wendy McGuire
DESIGNATION	Head of Housing
CONTACT INFO	Anne Kripler – Housing Strategy Officer akripler1@eastlothian.gov.uk
DATE	20/12/2023

Consultation on proposals to enhance the accessibility, adaptability and usability of Scotland's homes

A Respondent Information Form (within Supporting Documents) must be completed and returned with your response

Question 1:

How do you feel about the proposal to not include the clauses within Sections 1 to 5 of Part 1 of the current Housing for Varying Needs design guide in the updated guide?

Please select **one** of the following **only**:

- I agree with the proposal
- I disagree with the proposal – some of the clauses should be included
- I disagree with the proposal – all of the clauses should be included
- I neither agree nor disagree with the proposal

This consultation response has been submitted on behalf of East Lothian Council and East Lothian Health and Social Care Partnership. Services which have contributed towards this response were:

- Housing Services: Housing Strategy, New Build, Housing Enabler and Occupational Therapists
- Children Services: Children Strategy, and Children Disability
- Health and Social Care Partnership: Adult Wellbeing: Community Care, Occupational Health

We would like to note that the design of this consultation is not considered accessible. It is acknowledged that the delivery and design of accessible housing is very complex. Nevertheless, the length, set up and design of this consultation has been challenging to follow for services who engage with HfVN on a regular basis.

East Lothian Council disagrees with the proposal and believes that all of the clauses should be included.

The development of new accessible homes cannot be considered in a vacuum from existing properties, particularly much older ones. 30% of East Lothian's housing

stock was built prior to 1945. These buildings are often protected by historical designations are less energy efficient and accessible than buildings built post-World War 2. Housing for Varying Needs (HfVN) does not only influence the design and development of new build housing, but guidance is also used by East Lothian Council's Occupational Therapists for the retrofitting of existing homes where possible.

HfVN is also used as a best practice document across various local authority and health and social care partnership services, for example Occupational Therapy/Adult Social Care. These services will not be familiar with building standards and do not refer to building standards when delivering accessible homes. many of which do not relate to building standards or other documents when delivering accessible homes. The consultation acknowledges that social housing providers are familiar with the existing HfVN document, however, if the existing information isn't also included, future practitioners will have less information and guidance. HfVN and the information it provides becomes even more crucial as it is meant to inform the development of all-tenure Scottish Accessible Homes Standard (p.72 of the consultation paper). Therefore, it is crucial it's crucial to keep the existing information as well as include updates.

Sections 1-5 refer to crucial elements of design which are often disregarded and/or misinterpreted by housebuilders. Removing such vital information and context from the document will result in the loss of these considerations which are currently taken when delivering accessible home and adaptations.

Children's Services highlighted the lack of consideration for children and their families. The guidance relates primarily to the needs of adults and older people and fails to acknowledge the needs of children and young people with disabilities and their families. While some of the needs of adults with disabilities will apply to children as well, for example additional space requirements, there are further considerations for children and families specifically. These considerations are highlighted across this consultation.

Section 1-5 which we believe should be kept should also consider children in the future:

- The guidance primarily focuses on people with physical disabilities and should be updated to consider a wider range of needs. There are a range of ways that housing can impact on children with various neurological needs. For example, the Children's Disability Team have supported a young person with an ASD diagnosis who required the walls to be reinforced as he would hit them and damage them. In another situation, soundproofing of the house was required as the child would make a lot of noise which resulted in complaints from the neighbours.
- This guidance discusses the integration of housing and the importance of people with particular needs not being isolated or cut off. The guidance states, 'some people, especially as they grow older, may prefer to be separated from family housing and have control over their contact with children and young people, as they can find groups of children at play annoying and even threatening'. The wording of this seems to prioritise the needs of older people and fails to acknowledge that the integration of housing also needs to be considered in relation to children with disabilities. While generally integration is beneficial, neighbours or communities that do not understand children's support needs can create additional challenges for families that may already be under significant pressure.
- Annex C mentions community provisions and access to facilities. However, provisions for children and families are not mentioned. Disabled children will likely need access to schools and some children will be supported by specialist education provisions. Children with disabilities need access to safe play areas and accessible playgrounds. This not only gives them somewhere safe to play but ensures they are included in communities.
- Further consideration is needed of situations where there may be multiple people within a family who have disabilities and the implications of this on their housing needs. This may be multiple siblings with disabilities or both a parent and child with disabilities. The Children's Disability Team supported a family in this situation who managed to secure an adapted house to meet the

needs of multiple family members with disabilities. This allowed them to stay together as a family and without this appropriate housing, the children would not have been able to remain living with their parents.

We would also like to note that better collaboration is needed between house designs and standards and planning application stages. Proposed accessible layout and HfVN should be provided at the planning stage. Often proposal plans for affordable housing that are not showing compliance and this is when we struggle to get developers to amend their house types as they dictate the house sizes and footprint and the layouts within are limited to any changes required. If this is picked up at this early stage, we would get a much more quality product which is suitable for the long term needs.

Question 2:

How do you feel about the proposals for Section 6 of Part 1 of the current guide?

Please select **one** of the following **only**:

- | | |
|---|-------------------------------------|
| I agree with all of the proposals | <input type="checkbox"/> |
| I agree with some but not all of the proposals | <input type="checkbox"/> |
| I disagree with all of the proposals | <input checked="" type="checkbox"/> |
| I neither agree nor disagree with the proposals | <input type="checkbox"/> |

The adoption of information into Building Standards has been welcomed in the past especially when working towards tenure neutral development. However, it is crucial to underline that HfVN offers much more detail and guidance when it comes to design considerations. These details are invaluable and should therefore be retained within the HfVN guidance otherwise this information will be lost, particularly for staff who are not familiar with building standards.

Considerations should be taken regarding:

- Stairs should be able to accommodate a stairlift, preferably straight stairs as it is easier and cheaper to retrofit stairlifts.

- The costs, space and ongoing maintenance costs for through floor lifts is high and additional allowances should be made.
- In terms of point 6.2 'gulley at ground level'; this should be retained in guidance even if superseded by Building Standards.

Question 3:

How do you feel about the proposal to update clauses 7.5.1 and 7.5.5 of the current guide to require that:

- all entrances to individual dwellings should be step free
- all entrances to individual dwellings should have an accessible threshold, and
- there should be a level area of at least 1200mm by 1200mm immediately in front of each entrance?

Please select **one** of the following **only**:

- I agree with all of the proposal
- I agree with some but not all of the proposal
- I disagree with all of the proposal
- I neither agree nor disagree with the proposal

All new build properties should be accessible and ramped/level access should be provided at all entrances. This would reduce pressures on future adaptation budgets. Transposing this requirement into building standards is therefore highly commended.

There are inconsistencies between different space requirements. For example, the level area at the door is 1200x1200mm however the wheelchair turning circle is to increase to 1800x1800mm. This will lead to confusion and negotiations with developers to ensure space requirements are met.

Guidance which is still applicable should be retained within this document, as discussed in Question 2.

Question 4:

How do you feel about the proposal to update clauses 7.6.3 and 7.6.5 of the current guide to require that the entrance platform should have dimensions of at least 1500mm by 1800mm in cases where a communal entrance door opens outwards?

Please select **one** of the following **only**:

- I agree with the proposal
- I disagree with the proposal

I neither agree nor disagree with the proposal



East Lothian Council agrees with the proposal as increasing platform entrances will increase accessibility and believe that the spacing proposed is considered reasonable and acceptable.

Question 5:

How do you feel about the proposals for the rest of the clauses within Section 7 of Part 1 of the current guide?

Please select **one** of the following **only**:

- I agree with all of the proposals
- I agree with some but not all of the proposals
- I disagree with all of the proposals
- I neither agree nor disagree with the proposals

Guidance which is still applicable should be retained within this document as discussed in Question 2. In particular the following should be retained;

7.3.5 info re widths to be clear of upstands.

7.4.1 Gate opening width

We believe that a consistent approach should be taken i.e. The gate width of 1000mm for twin-child buggies is being retained whilst the width for wheelchairs is removed.

7.7 section should be retained as this section contains info re gradients, distances for each slope, handrail info, etc

7.5.3 Removal of steps sizes as in BS – should be retained

7.11.2 door entry heights – information on bell requirements is retained within Figure 7.7, therefore additional written information should be kept alongside the drawing.

Question 6:

How do you feel about the proposal to update clauses 8.2.1 and 8.2.2 of the current guide:

- to require that entrance doors to communal access areas – including those doors giving access to external facilities such as drying areas, gardens and refuse stores – have a minimum clear opening width of 850mm between the door face on one side and the door stop, or second door, on the other, and
- to allow any weather moulding at the base of the door to intrude into this opening width?

Please select **one** of the following **only**:

- I agree with all of the proposal
- I agree with some but not all of the proposal
- I disagree with all of the proposal
- I neither agree nor disagree with the proposal

The proposed changes would allow for better access to facilities within a person's home environment.

We agree with these proposals in principle however these proposals required increased subsidy from Scottish Government for delivery. Wider entrance doors and the proposal for these to open into a corridor rather than a room, could result in significant additional costs particularly for wheelchair bungalows where the requirements would be more exacting for activity spaces etc.

Proposal for flat entrance doors to be painted different colours would make maintenance more complex and expensive.

Please note a 10mm increase may not be sufficient, because larger door leaf's will require more door opening space to create clear passage.

Question 7:

How do you feel about the proposal to update clauses 8.3.3 and 8.3.4 of the current guide to require:

- that communal entrances should have automatic opening and powered swing doors installed as standard
- that a suitable open/ release pad-type button positioned on the perpendicular wall internally, outwith the swing of the door, should be provided
- that a fob-type or similar access system to enter the building from outside should be provided
- that the timing of the stay open duration should be adjustable, and
- that communal entrance doors would need to be able to be manually opened and closed in circumstances where the automatic opening devices have failed?

Please select **one** of the following **only**:

- I agree with all of the proposal
- I agree with some but not all of the proposal
- I disagree with all of the proposal
- I neither agree nor disagree with the proposal

We agree with these proposals in principle as creating barrier free access is more costly in retrospect. However, the cost implications associated with the proposals are significant, not only in terms of one-off installation costs but also maintenance.

There are also a range of other considerations such as

. E.g., where automatic doors in an old person complex close too quickly this can cause injury. In cases where the doors close too slow, people can become susceptible to intruders which could be particularly concerning for domestic abuse survivors.

Question 8:

How do you feel about the proposal to require that internal doors within communal access areas should have a minimum clear opening width of 850mm between the door face on one side and the door stop, or second door, on the other?

Please select **one** of the following **only**:

I agree with the proposal

I disagree with the proposal

I neither agree nor disagree with the proposal

In principle, we agree with these proposals. However, these changes will result in additional floor space and additional costs. When considering affordable housing, this may result in fewer units being delivered for the same or a more expensive cost. This must be matched by Scottish Government subsidy.

H&SCP note that a 900mm clear passing is recommended to ensure doors can be opened wide enough for users to pass through doors. Clarity on terminology should be given on what is meant by a clear opening width as this can be interpreted in different ways. There have been cases where door trimmings were not considered and users could not pass doors. Clear passage of 850 or 900mm should be available after full installation of all doors.

Question 9:

How do you feel about the proposal to include reference to the following design guidance within the updated guide:

- in multi-storey buildings containing dwellings, the walls of each floor containing dwellings may be decorated in distinguishing tones to help people to find their way, and
- this may be further enhanced by providing visual indicators at the entrance to each floor?

Please select **one** of the following **only**:

- I agree with all of the proposal
- I agree with some but not all of the proposal
- I disagree with all of the proposal
- I neither agree nor disagree with the proposal

East Lothian Council welcomes this change; however we are apprehensive about the incurring costs of additional wall painting in terms of initial development and continuous maintenance thereafter. Further guidance and information on the future funding is required.

Question 10:

How do you feel about the proposals for the rest of the clauses within Section 8 of Part 1 of the current guide?

Please select **one** of the following **only**:

- I agree with all of the proposals
- I agree with some but not all of the proposals
- I disagree with all of the proposals
- I neither agree nor disagree with the proposals

The existing guidance in this section which would still be applicable should be retained, even if also included in Building Standards, as it is widely used.

Question 11:

How do you feel about the proposal to update clauses 9.2.1, 9.2.3 and 9.2.4 of the current guide:

- to require that entrance doors to dwellings should have a minimum clear opening width of 850mm between the door face on one side and the door stop, or second door, on the other, and
- to allow any weather moulding at the base of the door to intrude into this clear width?

Please select **one** of the following **only**:

- I agree with all of the proposal
- I agree with some but not all of the proposal
- I disagree with all of the proposal
- I neither agree nor disagree with the proposal

Accessibility will be increased; however it is unclear whether 10mm is sufficient. This has to be balanced with the additional costs of providing additional space for larger door leaf's and door opening space.

Question 12:

How do you feel about the proposal to include reference within the updated guide to the fact that entrance doors to individual dwellings may be personalised/ made distinctive from other neighbouring entrance doors, subject to any local planning restrictions that may be in place?

Please select **one** of the following **only**:

- I agree with the proposal
- I disagree with the proposal
- I neither agree nor disagree with the proposal

East Lothian Council welcomes this change; however we are apprehensive about the incurring costs of additional wall painting in terms of initial development and continuous maintenance thereafter. This principle should be in conjunction with other way finder information i.e., distinguishing streets as well as properties. Further guidance and information on the future funding of development is required.

Question 13:

How do you feel about the proposal to update clauses 9.6.1 and 9.6.4 of the current guide to require:

- that the main entrance door should open into a circulation area and not a room
- that the entrance door should open into a space of at least 1200mm by 1200mm, and
- that the area should extend for at least a further 600mm with a minimum width of at least 1200mm?

Please select **one** of the following **only**:

I agree with all of the proposal

I agree with some but not all of the proposal

I disagree with all of the proposal

I neither agree nor disagree with the proposal

ELC welcomes and agrees with the proposed changes. However, we are apprehensive about the implication these changes will have on increased floor areas, the consequent cost implications and potential reduction in the number of homes being developed for the social sector as a result.

Question 14:

How do you feel about the proposal to update clause 9.6.6 of the current guide to require:

- that the circulation space immediately inside the door should have a minimum width of 1800mm extending at least 1800mm back from the face of the door, and
- that the area should extend for at least a further 500mm with a minimum width of 1200mm?

Please select **one** of the following **only**:

- I agree with all of the proposal
- I agree with some but not all of the proposal
- I disagree with all of the proposal
- I neither agree nor disagree with the proposal

ELC welcomes the proposed changes. It is considered more cost effective than retrospective adaptations. Nevertheless, the increase in footprint regarding the costs for bungalows is of particular concern.

Question 15:

How do you feel about the proposals for the rest of the clauses within Section 9 of Part 1 of the current guide?

Please select **one** of the following **only**:

- I agree with all of the proposals
- I agree with some but not all of the proposals
- I disagree with all of the proposals
- I neither agree nor disagree with the proposals

The existing guidance in this section which would still be applicable should be retained, even if also reflected in building standards, as it is widely used. In particular:

9.3.3 is to be removed re threshold bars should not incorporate weather bars with an upstand if more than 25mm – this information should be included in the new proposed section 7.5 as set out in chapter 2.

9.4.1 might be useful to confirm lock specification must comply with Building Standards but don't necessarily need the additional details.

9.6.2/ 9.6.5 to be removed re step free entrances having a return of at least 300mm at the handle edge to allow wheelchair users to access – this would be desirable for all types of users.

Question 16:

How do you feel about the proposal to update clauses 10.2.1, 10.2.2 and 10.2.3 of the current guide:

- to require that corridors in individual dwellings should be at least 1200mm wide
- to require that other than on a wall opposite a doorway, an obstruction such as a radiator should project by no more than 100mm, reducing the corridor width to not less than 1100mm over a maximum length of 1200mm, and
- to include reference within the updated guide to the fact that, in cases where a corridor has an exposed right angle turn, a splay of 200mm to 300mm at the corner would allow easier circulation?

Please select **one** of the following **only**:

- I agree with all of the proposal
- I agree with some but not all of the proposal
- I disagree with all of the proposal
- I neither agree nor disagree with the proposal

ELC considers the proposal to be desirable in terms of increasing accessibility. However, it cannot be ignored that the proposal will incur additional cost (an indicative cost of £1,360 per 3 bed house is mentioned). In addition to this, the proposal will add to the footprint of a dwelling and this in turn will mean that sites might deliver less units which may result in increased land costs and/or lower delivery.

Question 17:

How do you feel about the proposal:

- to require that a through floor lift should be installed between floors in cases where the dwelling is specifically designed for wheelchair users and is constructed on more than one level
- to require that the entry to the lift at any level should not be in an area which impacts on an occupant's privacy, for example, in a bedroom
- to require that the floor of the lift should be a minimum size of 1650mm by 1100mm, and
- to require that there should be space allowance for an 1800mm clear turning circle directly outside of the entrance to the lift on each floor.

Please select **one** of the following **only**:

- I agree with all of the proposal
- I agree with some but not all of the proposal
- I disagree with all of the proposal
- I neither agree nor disagree with the proposal

In certain circumstances and locations 2 storey dwellings for wheelchair users are a better option. 2 storey buildings require a smaller footprint and 4 or 5 bed homes are difficult to accommodate on one single floor. The additional cost would be significant (estimated at £21,400 per 3 bed house). Furthermore, it is assumed that this estimate does not include the cost of all the other additional proposals applying specifically to wheelchair dwellings (increased door widths and circulation space etc). The proposal should make this clear. Also, the maintenance cost for lifts can be substantial and the question of cost responsibility has not been considered.

Question 18:

How do you feel about the proposal to update clauses 10.5.1 and 10.5.7 of the current guide to require that:

- internal pass doors, including doors to walk-in cupboards, should have a clear opening width of at least 850mm, and
- door frames should not have threshold plates?

Please select **one** of the following **only**:

- I agree with all of the proposal
- I agree with some but not all of the proposal
- I disagree with all of the proposal
- I neither agree nor disagree with the proposal

Question 19:

How do you feel about the proposals for the rest of the clauses within Section 10 of Part 1 of the current guide?

Please select **one** of the following **only**:

- I agree with all of the proposals
- I agree with some but not all of the proposals
- I disagree with all of the proposals
- I neither agree nor disagree with the proposals

The existing guidance in this section which would still be applicable should be retained, even if also reflected in building standards, as it is widely used.

Question 20:

How do you feel about the proposal to update clause 11.1.2 of the current guide to require:

- that the space that is needed for circulation and access to each item of furniture and to the windows, heating appliances etc within the living room(s) and all bedrooms must be 800mm wide, and
- that there should be space for a wheelchair to turn through 180°, that is a circular area of 1800mm diameter, in the living room(s) and all bedrooms to enable a wheelchair to turn through 180°?

Please select **one** of the following **only**:

- I agree with all of the proposal
- I agree with some but not all of the proposal
- I disagree with all of the proposal
- I neither agree nor disagree with the proposal

Although this proposal is desirable, concerns around the increase in floorspace and the knock-on effect of a reduction of the number of homes delivered should be noted. In addition, practical challenges around existing planning permission should be considered.

Question 21:

How do you feel about the proposals for the rest of the clauses within Section 11 of Part 1 of the current guide?

Please select **one** of the following **only**:

- I agree with all of the proposals
- I agree with some but not all of the proposals
- I disagree with all of the proposals
- I neither agree nor disagree with the proposals

Please explain the reasons for your answer.

Question 22:

How do you feel about the proposals for Section 12 of Part 1 of the current guide?

Please select **one** of the following **only**:

- I agree with all of the proposals
- I agree with some but not all of the proposals
- I disagree with all of the proposals
- I neither agree nor disagree with the proposals

Standards on storage have been neglected for years in the Building Standards. We would like storage design details to include minimum quantitative sizing, as descriptive measurements have previously led to developers not delivering sufficient storage space and/or taken up storage space with other utility machinery. This takes away from storing specialist equipment, and other items crucial for independent living. This is particularly relevant for children with disabilities. As children grow their equipment and aids also grow. They may also require therapeutic or medical equipment which requires additional space. The Children's Disability Team has previously had to fund external storage units in the garden as there was no space in a family's home for the equipment they required. This was in a new-build house. Storage is particularly important in terms of future proofing, as adaptations funding cannot take storage into account. This means that while a property may be able to be made adaptable, it may still not provide sufficient living space due to the lack of storage facilities.

It is also important for the Scottish Government to consider wider legislation and how this will impact housing as a whole. For example, the introduction of air source heat pumps is likely to further reduce storage space due to the need to accommodate hot water cylinders, additional plumbing and larger radiators. Storage space is incredibly important to make housing suitable for people's needs.

Question 23:

How do you feel about the proposal to require that pelmet lighting under wall units should be provided in kitchens?

Please select **one** of the following **only**:

I agree with the proposal

I disagree with the proposal

I neither agree nor disagree with the proposal

From previous experience, more specification on the location of lighting control location for accessibility is required. In addition, maintenance considerations should also be taken.

Question 24:

How do you feel about the proposal to update clause 13.5.4 of the current guide to require that kitchens should be of a size that allows a clear space of 1800mm in front of fittings and appliances to allow a wheelchair user space to manoeuvre and turn through 180°, that is a circular area of 1800mm diameter?

Please select **one** of the following **only**:

I agree with the proposal

I disagree with the proposal

I neither agree nor disagree with the proposal

While desirable in terms of increasing accessibility, the proposal will incur substantial additional cost (an indicative cost of £1,840 per 3 bed house is mentioned). In addition, this proposal will add to the footprint of a dwelling and this in turn will mean that sites might deliver less units which may result in increased land costs and/or lower delivery. This could be particularly problematic where sites already have planning permission based on current space standards. Since we are already struggling to get private developers to provide wheelchair accessible dwellings on affordable housing sites, this is likely to be a further deterrent.

Question 25:

How do you feel about the proposals for the rest of the clauses within Section 13 of Part 1 of the current guide?

Please select **one** of the following **only**:

I agree with all of the proposals

I agree with some but not all of the proposals

I disagree with all of the proposals

I neither agree nor disagree with the proposals

The existing guidance in this section which would still be applicable should be retained, even if also reflected in building standards, as it is widely used.

Question 26:

In cases where a wet floor shower facility is not provided in the dwelling, how do you feel about the proposal to update clause 14.2.6 of the current guide to require:

- that an electrical connection and a capped drainage connection should be installed in the main bathroom to allow for its future installation
- that the floor build up in the proposed area for a future wet floor shower should be able to accommodate a tray former and associated plumbing with minimal disruption at a later date
- that if the floor is of solid concrete construction, a dropped section should be built in to meet the requirement of the second bullet point above, and
- that adjacent walls should be of robust construction to be capable of supporting a shower screen to enclose the shower area or grab rails if required?

Please select **one** of the following **only**:

- I agree with all of the proposal
- I agree with some but not all of the proposal
- I disagree with all of the proposal
- I neither agree nor disagree with the proposal

It is considered that the proposal will reduce future adaptation costs and the need for intrusive work. East Lothian Council install electric over bath shower as standard in main bathrooms so there should already be an electrical supply into the bathroom for future wet floor shower

The inclusion of a spur for Closomat fittings should be added.

Question 27:

How do you feel about the proposal to update clause 14.8.2 of the current guide to require:

- that accessible sanitary accommodation located on the principal living level, where the accessible bath or shower is located on another level, should be capable of being adapted to accommodate a future shower or form a larger space for wheelchair users at a later date
- that this space allowance should contain an electrical connection and a capped drainage connection
- that the floor build up in the proposed area for a future wet floor shower should be able to accommodate a tray former and associated plumbing with minimal disruption at a later date
- that if the floor is of solid concrete construction, then a dropped section should be built in to meet the requirement of the third bullet point above, and
- that adjacent walls should be of robust construction to be capable of supporting a shower screen to enclose the shower area or grab rails if required.

Please select **one** of the following **only**:

- I agree with all of the proposal
- I agree with some but not all of the proposal
- I disagree with all of the proposal
- I neither agree nor disagree with the proposal

Additional “future shower space”, usually in form of a cupboard, is provided under the current Building Regulations for future adaptations, but the space is often not usable. For example, the space accommodates an electrical fuse box or is under the stairs (low ceiling height).

More details and clarifications should be included within building regulations and in HfVN.

Question 28:

How do you feel about the proposal to update clause 14.9.1 of the current guide:

- to require that the layout and dimensions of the bathroom should allow for a wet floor shower area with floor gulley, a wash-hand basin and WC and their associated activity spaces
- if no bath is provided, to require that space, plumbing and drainage allowances should be made to facilitate the future installation of a bath
- to require that activity spaces should not overlap the space allocated for a future bath
- to require that the bathroom must have a sealed impermeable floor and all fittings must be of a design to suit wheelchair use, and
- to include within the updated guide reference to the fact that it is beneficial if bathrooms in dwellings within a development contain different layouts to allow for different hand preference?

Please select **one** of the following **only**:

- I agree with all of the proposal
- I agree with some but not all of the proposal
- I disagree with all of the proposal
- I neither agree nor disagree with the proposal

Figure 14.9 is a useful reference.

While desirable in terms of increasing accessibility, the proposal will incur additional cost (although no cost estimate is provided). This proposal will add to the footprint of a dwelling and this in turn will mean that sites might deliver less units which may result in increased land costs and/or lower delivery. This could be particularly problematic where sites already have planning permission based on current space standards. Since we are already struggling to get private developers to provide wheelchair accessible dwellings on affordable housing sites, this is likely to be a further deterrent.

Question 29:

How do you feel about the proposal to update clause 14.9.2 of the current guide:

- to require that the space in the bathroom should allow for someone in a wheelchair to turn through 180°, that is a circular area of 1800mm diameter, without being impeded by the door
- to include within the updated guide reference to the fact that, except in very large bathrooms, this is helped by the door opening outwards, or by the use of sliding or pocket doors as an alternative to hinged doors – but only in cases where the use of sliding or pocket doors would be appropriate for the needs of the household
- to require that the plan of the dwelling should ensure that if the door opens outwards this does not cause a hazard
- to require that there is space for a helper alongside a wheelchair in the bathroom, and
- to require that the allowance for a turning circle should not overlap the wet floor shower area or the area identified for the installation of a bath (where no bath is provided)?

Please select **one** of the following **only**:

- I agree with all of the proposal
- I agree with some but not all of the proposal
- I disagree with all of the proposal
- I neither agree nor disagree with the proposal

While desirable in terms of increasing accessibility, the larger space required by the proposal will incur additional cost (a cost estimate of £640 for a 3 bed house is provided) but in addition this proposal will add to the footprint of a dwelling and this in turn will mean that sites might deliver less units which may result in increased land costs and/or lower delivery. This could be particularly problematic where sites already have planning permission based on current space standards. Since we are already struggling to get private developers to provide wheelchair accessible dwellings on affordable housing sites, this is likely to be a further deterrent.

Question 30:

How do you feel about the proposal to update clause 14.11.6 of the current guide to require that all WCs in dwellings should have a suitably protected fused spur adjacent to each WC to allow for any future installation of a WC with washing and drying facilities?

Please select **one** of the following **only**:

- I agree with the proposal
- I disagree with the proposal
- I neither agree nor disagree with the proposal

Please explain the reasons for your answer.

Question 31:

How do you feel about the proposals for the rest of the clauses within Section 14 of Part 1 of the current guide?

Please select **one** of the following **only**:

- I agree with all of the proposals
- I agree with some but not all of the proposals
- I disagree with all of the proposals
- I neither agree nor disagree with the proposals

The existing guidance in this section which would still be applicable should be retained, even if also reflected in building standards, as it is widely used.

14.2.3 – should be rewritten, a discussion on the provision of either shower or bath should still be had even if existing clause is outdated.

14.2.7 – in some cases sliding doors are considered more appropriate, this should be mentioned, as they are not necessarily considered as door which 'open outwards'.

Question 32:

How do you feel about the proposals for Section 15 of Part 1 of the current guide?

Please select **one** of the following **only**:

I agree with all of the proposals

I agree with some but not all of the proposals

I disagree with all of the proposals

I neither agree nor disagree with the proposals

The existing guidance is useful.

Question 33:

How do you feel about the proposal to require that the main living room within the dwelling should be provided with a glazed area of not less than 1/8th of the floor area of that room?

Please select **one** of the following **only**:

- I agree with the proposal
- I disagree with the proposal
- I neither agree nor disagree with the proposal

The proposal may lead to improved levels of natural lighting, although it is not clear what the average proportion of glazed area to floor area is currently.

Question 34:

How do you feel about the proposals for the rest of the clauses within Section 16 of Part 1 of the current guide?

Please select **one** of the following **only**:

- I agree with all of the proposals
- I agree with some but not all of the proposals
- I disagree with all of the proposals
- I neither agree nor disagree with the proposals

The existing guidance in this section which would still be applicable should be retained, even if also reflected in building standards, as HfVN is widely used.

Question 35:

How do you feel about the proposals for Section 17 of Part 1 of the current guide?

Please select **one** of the following **only**:

I agree with all of the proposals

I agree with some but not all of the proposals

I disagree with all of the proposals

I neither agree nor disagree with the proposals

17.2.3 should be replaced by a new paragraph requiring natural ventilation for wet floor showers/bathrooms for wheelchair users. Our experience is that mechanical ventilation is often insufficient for wet floors as wheelchair users may need to shower frequently and for lengthy periods with consequent damp and mould issues.

17.4.3 should be retained as it is useful in terms of fitting thermostatic mixing valves.

Question 36:

How do you feel about the proposal to update clause 18.2.3 of the current guide to require:

- that all dwellings should have:
 - at least eight power sockets in the kitchen
 - at least eight power sockets in the living room
 - at least six power sockets in each remaining room, that is any other room which is not a bathroom or WC compartment, and
 - at least six power sockets elsewhere in the home
- that power sockets within the above requirement should be included at the designated desk or work space, and at both the telephone and television outlets, and
- that a power socket in addition to the above requirement should also be provided at each flight of stairs within a dwelling to allow, for example, for a future stair lift installation?

Please select **one** of the following **only**:

- | | |
|--|-------------------------------------|
| I agree with all of the proposal | <input checked="" type="checkbox"/> |
| I agree with some but not all of the proposal | <input type="checkbox"/> |
| I disagree with all of the proposal | <input type="checkbox"/> |
| I neither agree nor disagree with the proposal | <input type="checkbox"/> |

Additional design considerations should be given, expanded within Question 40.

Question 37:

How do you feel about the proposals for the rest of the clauses within Section 18 of Part 1 of the current guide?

Please select **one** of the following **only**:

I agree with all of the proposals

I agree with some but not all of the proposals

I disagree with all of the proposals

I neither agree nor disagree with the proposals

Guidance is considered useful.

Question 38:

How do you feel about the proposals for the rest of the clauses within Section 19 of Part 1 of the current guide?

Please select **one** of the following **only**:

- I agree with all of the proposals
- I agree with some but not all of the proposals
- I disagree with all of the proposals
- I neither agree nor disagree with the proposals

We support the proposal to include a requirement under the Building Standards for private or communal outdoor space (including balconies) for all dwellings.

HfVN should take into consideration more than just garden space for elderly people. The guidance acknowledges the benefit of a private garden to ensure access to outside space. However, it states specifically in relation to dwellings for older people that this garden space should be small “as older or disabled occupants are unlikely to be able to tend a larger garden”. Consideration should also be given to the needs of families who may require a larger garden space for children with disabilities or possibly for multiple family members with disabilities. Furthermore, adjustments may be required to ensure this is a safe space, for example, making sure it is an enclosed area with higher fences.

Question 39:

How do you feel about the proposal to not include the clauses within Section 20 of Part 1 of the current Housing for Varying Needs design guide in the updated guide?

Please select **one** of the following **only**:

- I agree with the proposal
- I disagree with the proposal – some of the clauses should be included
- I disagree with the proposal – all of the clauses should be included
- I neither agree nor disagree with the proposal

As mentioned within the response to Question 1. Current services and staff are using the HfVN guide to adapt existing homes to the standards of the HfVN where feasible. A home's accessibility and adaptability is therefore measured based on existing guidance. This needs to be recognised by the guidance itself. Likewise, some of the responses within this document have relied on years of experience retrofitting accessibility measures into homes by understanding the practicalities and realities of what an accessible home looks like.

East Lothian Housing and Health and Social Care Services have experienced increased demand for adapting homes retrospectively. Increasing costs of materials, lack of labour force and increasing demand and complexity of adaptations has put strenuous pressures on adaptations budgets. The development of better accessible and adaptable housing has a considerable impact on future adaptations. This intrinsic connection needs to be acknowledged at all times. Therefore, this clause should be updated accordingly and kept within the guidance.

Notably, 20.3 uses outdated language reference to 'confused people' should be removed.

Question 40:

Are there any other design changes that you would like to see included in the updated guide?

Please select **one** of the following **only**:

- Yes
- No
- Don't know/ no opinion

In addition to the proposed changes related to in Question 36; we would wish to see guidance that connections for the wi-fi router are located in the living room or other open central point in the dwelling to ensure better coverage. They are frequently positioned in store cupboards which are not good for transmission.

Question 41:

Do you have any practical suggestions for improving how the updated guide should be structured and/ or presented?

Please select **one** of the following **only**:

- Yes
- No
- Don't know/ no opinion

A lot of the existing HFVN guidance is being removed and superseded by Building standards however not everyone will access this document therefore would be better to include this information in the new guidance to make it accessible to all.

PDF tags and heading hyperlinks should be used to enable quick moving across topics.

An interactive webpage could also be used to navigate the large document.

E.g. an exemplar building could be used which allows people to click on a certain part of the building where information would pop up regarding the standard and guidance which can be expanded upon on a new tab.

A more 'basic' way is providing something similar than was prepared in terms of migration and NRPF guidance, prepared by COSLA which allows people to click

through different sections more easily. <https://migrationscotland.org.uk/migrants-rights-and-entitlements/introduction/>

Question 42:

How do you feel about the exceptions that we are proposing be used to identify the design criteria within the updated guide that will not be transposed into building standards?

Please select **one** of the following **only**:

- I agree with all of the proposed exceptions
- I agree with some but not all of the proposed exceptions
- I disagree with the proposed exceptions
- I neither agree nor disagree with the proposed exceptions

Exception A – as previously mentioned there is concern that the transposing into Building Standards only will result in a loss in information.

Exception B – We understand the specific purpose of Building Standards and that not all accessibility standards fall within the regulatory standard of Building Standards. Nevertheless, many of the clauses should be retained/transposed into existing or additional documents so avoid the loss of good guidance and information.

Exception C – Agree providing there are safeguards in place for these groups and that it does not lessen the private sectors responsibility for providing homes other than general needs.

Question 43:

Do you feel that the indicative design criteria listed in Table 1 would be appropriate to apply to all new housing across all tenures?

Please select **one** of the following **only**:

I feel that all of the criteria would be appropriate to apply to all new housing across all tenures

I feel that some but not all of the criteria would be appropriate to apply to all new housing across all tenures

I do not feel that the criteria would be appropriate to apply to all new housing across all tenures

To support tenure neutral and blind development, all criteria should be adopted across all new housing. This is in accordance with Housing to 2040. Tenure neutral development is necessary to give people choice in tenure when it comes to living in an accessible and adaptable home. Furthermore, the responsibility to deliver accessible and adaptable homes can not only be put on social landlords but should also be demanded from private developers. Continuous budget cuts for social landlords is significantly limiting current investment in new build housing, further relying on the private sector to deliver homes. The existing housing crisis requires appropriate house building across tenures to achieve the existing target of 110,000 affordable homes by 2032.

Question 44:

Are there any other design criteria that are not currently proposed to be transposed into building standards that you would wish to see included within the Scottish Accessible Homes Standard?

Please select **one** of the following **only**:

- Yes
- No
- Don't know/ no opinion

The standard for social and private housing should be equal. This would align with the Scottish Government's aim to work towards tenure neutral and blind housing stock. There should be no two standards for housing accessibility. The financial implication of more accessible housing should not only be carried by social landlords but also by the private sector. This would reduce demand on social housing and avoid situations where individuals who can afford and want to buy market housing are forced to seek limited supplies of social homes because there is no sufficient accessible market housing,

Question 45:

Do you have any comments on the existing design guidance for stairs contained within Standard 4.3 of the Building Standards Domestic Technical Handbooks?

Please select **one** of the following **only**:

- Yes
- No
- Don't know/ no opinion

Question 46:

Do you have any examples of situations where you have gone beyond the minimum standards for stairs or access between storeys set out by building regulations, and the benefits such an approach has delivered?

Please select **one** of the following **only**:

- Yes
- No
- Don't know/ no opinion

Question 47:

Do you have any other comments on our proposals for the Scottish Accessible Homes Standard?

Please select **one** of the following **only**:

- Yes
- No
- Don't know/ no opinion

Landing areas are to be free from clutter (points 7). However, in a separate point, a requirement for room for a seat is also mentioned. A minimum size for landing should be introduced including space for seating to avoid obstruction (points 8.5). It currently states "allow space" but it is considered that this is too open for interpretation.

Regarding point 10.5.3 it is considered that all bathroom doors should be opening outwards.

It is also considered that a minimum bedroom size should be provided for sufficient circulation and bedspace.

Question 48:

Do you have any feedback on any possible impacts that the proposals set out within Chapter 2 and Chapter 3 of this consultation paper may have on groups of people with protected characteristics, as identified in the Equality Act 2010?

Please select **one** of the following **only**:

- Yes
- No
- Don't know/ no opinion

As mentioned, increasing the number of more accessible homes may result in a reduction in the number of homes delivered overall. This statement stands in contrast to the Scottish Government's overall aim to deliver 110,000 homes over the next few years. Clarity is required how this negative impact will be mitigated. Whilst we welcome the increasing accessibility standards for homes, we do not consider the reduction in homes being delivered as an acceptable impact given the current housing crisis the country is facing. Particularly persons with protected characteristics rely on affordable housing and the lack thereof reduces their quality of life significantly.

It is also recognised that persons with protected characteristics who also rely on highly accessible housing are further disadvantaged. All housing, regardless of tenure should offer the same levels of accessibility to offer people choice. One single all tenure building standard would enforce a high level of accessibility. It would also reduce pressures on the social sector who are often the last options for persons requiring accessible housing. People fall into living in the social rented sector regardless of characteristics and socio-economic background, due to the private sector lagging in terms of providing accessible homes.

The impact on all the characteristics has not been fully considered:

In terms of mobile homes, adequate funding is required to make them accessible when and where required.

Characteristics such as gender reassignment; sex; pregnancy and maternity; and marriage should also be considered in more detail. Women, for example, do not have equal opportunities when it comes to accessing homes and their caring roles often result in them having less income and pension to pay for housing. Women are also more likely to outlive their male partners and a higher percentage of widowers are homeowners. Therefore, it can be assumed that older females living by themselves on a small pension will be unable to fund suitable adaptations or invest in better accessible housing.

Question 49:

Do you have any feedback on any possible impacts that the proposals set out within Chapter 2 and Chapter 3 of this consultation paper may have on island communities which would be significantly different from the impact on other communities?

Please select **one** of the following **only**:

- Yes
- No
- Don't know/ no opinion

Please explain the reasons for your answer.

Question 50:

Do you have any feedback on any possible impacts that the proposals set out within Chapter 2 and Chapter 3 of this consultation paper may have on the challenges that people can face as a result of socio-economic disadvantage?

Please select **one** of the following **only**:

- Yes
- No
- Don't know/ no opinion

It is mentioned that fewer home may be delivered as part of the proposed changes. In the current economic climate, housing deliverability is already reduced. The overall reduction in house building will have a serious negative impact on all people who socio-economically disadvantaged.

Although the increase of housing accessibility is commended, consideration and funding for the delivery of more and not less housing needs to be supported by Scottish Government.

The last paragraph mentions that housing creates and supports jobs and the economy. It is however not explained how more accessible housing will further contribute towards this. Housing will continue to be built, regardless of it's accessibility standards, therefore it is unclear under the existing consultation paper how more accessible housing would impact the economy.

Question 51:

Do you have any feedback on any possible impacts that the proposals set out within Chapter 2 and Chapter 3 of this consultation paper may have on the human rights and wellbeing of children and young people?

Please select **one** of the following **only**:

Yes

No

Don't know/ no opinion

The information provided in this document regarding the rights of children and their wellbeing is not considered sufficient or thorough. This section states that the consultation paper will have an impact on children and young people and will impact on the UNCRC. However, it does not outline in what way this will impact on children, young people and the UNCRC. A more detailed assessment is required.

It is mentioned that fewer homes may be delivered as part of the proposed changes. In the current economic climate, housing deliverability is already reduced. The overall reduction in house building will have a serious negative impact on all children. Although the increase of housing accessibility is commended, consideration and funding for the delivery of more and not less housing needs to be supported by Scottish Government.

Question 52:

Do you have any feedback on any possible impacts that the proposals set out within Chapter 2 and Chapter 3 of this consultation paper may have on businesses and the third sector?

Please select **one** of the following **only**:

Yes

No

Don't know/ no opinion

As previous mentioned, the financial costs for landlords will increase significantly, and without additional financial support, the development of new affordable homes will decrease. This will have a knock-on effect on other third sector organisations who support persons in need.

The overall cost implications of properties requiring larger floor space and the consequences this will have in terms of land requirements, developer costs and deliverable affordable housing has not been fully taken account in the cost assessment. Likewise the costs of maintenance has also not been considered.