

# Enhancing the accessibility, adaptability and useability of Scotland's homes

## Response submitted to the Scottish Government 21 November 2023

This is a response to the Scottish Government's review of the [Housing for Varying Needs \(HfVN\) design guide](#).

### Introduction

HfVN sets out the accessibility standards for new homes delivered with grant funding through the Affordable Housing Supply Programme (AHSP) and Gypsy/Traveller Accommodation Fund. The consultation also considers the standards which should be applied to all new build homes through a new all-tenure Scottish Accessible Homes Standard (SAHS) which will be introduced by updating general building standards and guidance from 2025/26.

The proposals only cover Part 1 of HfVN which applies to new self-contained houses and flats. Part 2 of the existing guidance covers the provision of homes for people who need housing with "integral support" which usually includes accommodation with communal spaces and facilities and is not being considered through this consultation.

While we have a significant interest in the standards to which new homes are delivered, CIH staff are not technical experts in building standards and regulations and so we have not addressed the specific technical proposals in this consultation. We have encouraged CIH members across Scotland who work in the design and delivery of homes, and who have extensive skills and expertise in this area, to comment on the very specific proposals. Our response sets out general comments on the scope of the review, and key points that have come up through discussion with our members and other stakeholders.

### General comments

#### Reviewing Housing for Varying Needs and developing a new Scottish Accessible Homes Standard

While we fully support the principle of improving accessibility and welcome the review of HfVN which is now around 25 years old, we think that the Scottish Government needs to take a more holistic approach to accessibility for all homes. We are disappointed that there will still be two distinct standards of accessibility, for affordable housing which will

need to meet HfVN and homes delivered through the private sector which will apply SAHS.

We understand from feedback given at a Scottish Government online workshop that the intention is for the majority of accessibility standards (excluding wheelchair standards) to apply to homes built in the private sector but that there are limited powers for the government to impose standards on fixtures and fittings. For example, specifying lighting under wall mounted kitchen cabinets. If this is the case, the Scottish Government should consider how private developers could be encouraged to adopt standards (such as lighting) which may not result in excessive additional costs, but which could help improve accessibility across all housing tenures.

#### The decision not to review Part 2 of Housing for Varying Needs

We appreciate that the consultation states that the focus of the review is on mainstream homes without integral support, where the majority of people live and want to continue to do so - but we feel this is a missed opportunity. Providing the right housing for people at different stages of life and as circumstances change requires the provision of a range of options including more accessible and adaptable mainstream housing, but also the provision of specialist housing and support. Models such as Housing with Care can deliver better outcomes for people and prevent the need for more costly and disruptive interventions such as admission to hospital or residential care.

The consultation document itself recognises that we have an ageing population, with the number of people aged 65 and over increasing from 16 per cent in 2001 to 20 per cent in 2021, and a significant level of unmet need for housing adaptations (56 per cent) among households where at least one member has a disability of long-term illness. While the Scottish Government's aim is to support as many people as possible to remain at home or in a homely setting, reducing the need for hospital admission and residential care, specialist housing plays an extremely important role in supporting people with additional needs.

Commenting on the consultation, the [Accessible Housing Network](#) points to a "chronic shortage" of accessible housing for older and disabled people which can result in long waits for adaptations or more suitable housing, ill health or injury and/or unnecessary waits in hospital. While there is an abundance of academic work identifying failures to address these needs, there is still a lack of data informing the need for specialist housing at a local level through housing need and demand assessments and Local Housing Strategies.

The consultation states that the housing element of developments including integral support can still be delivered through the AHSP, although other elements will continue to be funded from other sources. The complex funding and fragile partnership arrangements required to deliver models such as Housing with Care can be difficult to negotiate and place excessive financial risks with the housing provider. Reviewing the guidance would have presented an opportunity for the government to set the tone for

more equitable, long-term funding and contractual arrangements between social landlords and health & social care partners.

### Definitions of need

It is proposed that new HfVN guidance will retain four distinct categories of need:

- General needs: the needs of the general population, where housing is not purpose built for a particular client group.
- Older people: generally defined as those aged 65 or older.
- Ambulant disabled people: people with a range of mobility or dexterity impairments, but whose disability permits them to walk with or without the use of aids and some may occasionally use a wheelchair.
- Wheelchair users: people who use a wheelchair all or most of the time.

Ideally, and if moving towards greater alignment of standards and more accessible homes for all, there would be as few categories as possible. The Scottish Government should consider having a baseline accessible standard for the majority of homes and one enhanced standard for fully wheelchair accessible homes, removing the requirement to refer to multiple categories of need.

### Removing clauses from sections 1-5 of Part 1

We acknowledge that the proposal states that information relating to the delivery of liveable places and sustainable communities is set out in the AHSP guidance and that the AHSP documents are familiar to affordable housing providers, having been in place for around 25 years. However, having two separate guides could create some confusion, especially for those who may be new to the sector. If requirements are to be covered in the AHSP and revised HfVN guidance, they should at least cross-reference each other.

### Proposals for section 6 of Part 1

The consultation suggests that clauses which have been superseded by building standards will be removed. Where this is the case, these should be clearly signposted in HfVN guidance.

### Estimated additional costs

Some members have questioned how and when the estimated costs were calculated and whether these provide an accurate assessment of the additional costs that will be added to the delivery of new homes. Interest rates, although falling, will have continued to add to the cost of materials and labour since the consultation was developed. Some members have also pointed out that it is unclear whether the estimated costs just refer to the materials and installation costs. Elements such as lifts require significant maintenance over the lifetime of the product and may be more difficult and costly to maintain in remote/rural areas.

Some proposals (such as wider door openings) are not attributed any additional costs. While the cost of a wider door may not create any additional costs in itself, the requirement for increased floor space could add to the full cost of the build.

No estimated costs are attributed to proposals to require indoor space for work or study, outdoor space, or digital connectivity.

While we agree that greater accessibility standards should be introduced across tenures, we do need to have a realistic estimate of the costs involved and the impact that this could have on the delivery of new homes and affordability for tenants in the social housing sector.



### **About CIH**

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