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*improving living in scotland*



**RESPONSE TO PUBLIC PETITION PE1554: DISABLED  
FRIENDLY HOUSING**

**27 April 2015**

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## ABOUT HOMES FOR SCOTLAND

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Homes for Scotland is **the** voice of the home building industry.

With a membership of some 200 organisations together providing 95% of new homes built for sale in Scotland each year as well as a significant proportion of affordable housing, we are committed to improving the quality of living in Scotland by providing this and future generations with warm, sustainable homes in places people *want* to live.

Visit [www.homesforscotland.com](http://www.homesforscotland.com) for further information and follow us on twitter @H\_F\_S

## PROCESS

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Homes for Scotland represents members on a wide range of issues affecting their ability to deliver much needed homes.

Our views are endorsed by committees and advisory groups utilising the skills and expertise of key representatives drawn from member companies.

This consultation has been discussed, drafted and approved by the Technical and Environment Advisory Group on Building Standards & Sustainability

## RESPONSE TO PUBLIC PETITION PE1554: DISABLED FRIENDLY HOUSING

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### Homes for Scotland Background

This paper has been prepared in response to Public Petition PE1554: Disabled Friendly Housing lodged with the Scottish Parliament on behalf of Leonard Cheshire Disability. Homes for Scotland (HFS) welcomes the opportunity to respond to the petitioners, and while have sympathy of the views expressed within report<sup>1</sup> associated with this petition, given the impact that the proposals could have on the deliverability and affordability on new homes delivered in Scotland, it is fair that consideration is given to the points that respond to calls for:

- a. Scottish Parliament to urge Scottish Government to take action to ensure that all new homes in Scotland are built to fully meet the Lifetime Homes Standards, and
- b. at least 10% of new homes to be built to fully wheelchair accessibility standards.

### Context

Firstly, we feel it is vital to note that this petition is part of a wider UK based campaign. Upon closer examination, many of the statistics used and assumptions made, we feel are void of consideration of Scottish applicable sources. Given that housing policy and building standards are devolved, these details and assumptions must be interpreted with some caution, and ultimately assessed for accuracy.

We also wonder whether the Lifetime Homes Standard is somewhat obsolete given recent and impending legislation changes across UK regions.

### Building Standards in Scotland

***“ACCESSIBILITY – BUILDINGS SHOULD BE DESIGNED TO CONSIDER SAFETY AND THE WELFARE AND CONVENIENCE OF BUILDING USERS. AN INCLUSIVE ENVIRONMENT IS ONE WITHIN WHICH EVERYONE, REGARDLESS OF AGE, DISABILITY OR CIRCUMSTANCE, CAN MAKE USE OF FACILITIES SAFELY, CONVENIENTLY AND WITHOUT ASSISTANCE TO THE BEST OF THEIR ABILITY. BUILDINGS THAT CONSIDER FUTURE FLEXIBILITY OF USE ALSO CONTRIBUTE TO THE CREATION OF A MORE SUSTAINABLE HOUSING STOCK, SIMPLIFYING ALTERATIONS. THIS CAN ALLOW PEOPLE TO REMAIN LONGER IN THEIR HOME, THROUGH CHANGING CIRCUMSTANCES, WITH THE MINIMUM OF DISRUPTION AND INCONVENIENCE.***

***THE GUIDANCE IN THIS SECTION, TOGETHER WITH GUIDANCE IN SECTION 3, ENVIRONMENT RELATING TO ACCESSIBILITY, HAS BEEN BASED AROUND AND DEVELOPED FROM, ISSUES THAT ARE INCLUDED IN ‘HOUSING FOR VARYING NEEDS’ AND THE LIFETIME HOMES CONCEPT DEVELOPED BY THE JOSEPH ROWNTREE FOUNDATION.”<sup>2</sup>***

It is clear that the little consideration has been given to the provisions already outlined within the current Scottish Building Standards. As clearly highlighted above guidance within the domestic technical handbooks is ‘based around and developed from’ the issues included in the Lifetime

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<sup>1</sup> ‘No Place Like Home; 5 Million Reasons to Make Housing Disabled-Friendly’, Leonard Cheshire Disability (2013)

<sup>2</sup> 2010 Scottish Building Standards Technical Handbooks (Domestic) – Section 4: Safety

Homes Standard as well as Housing for Varying Needs. The findings from our technical group<sup>3</sup> suggest that the standards outlined in the domestic technical handbooks closely align with the criteria outlined in Lifetime Homes, additionally noting designers since 2007 have been mandated to consider the 'future provision' of accessible adaptation, enabling home owners the ability to temporarily or permanently adapt new homes to meet individual user needs. For example, provisions already exist for accessible thresholds, provision for future accessible WC and shower facilities upon the primary level of a home, provision of grab rails, as well as installation of more permanent features such as a stair lift.

Our members noted that the majority of the 16 design criteria covered within the Lifetime Homes Standard are covered by Scottish Building Standards. It is additionally reasoned that where standards marginally differ, this provides designers reasonable flexibility to optimise design solutions to meet specific design challenges such as site topographical constraints. Our members strongly believe that regulation should fully consider what is both technically possible and economically viable in ensuring there are no unnecessary barriers to the delivery of new homes in Scotland. We recommend that the committee take further evidence from the Scottish Government Building Standards Division on this matter.

### **Additional Cost Factors to Industry & Customers**

As previously noted, it is clear that this petition has not fully considered the specific consequences of what is being proposed could have on housing delivery in Scotland, particularly in relation to cost. The cost impact assumptions used within the report do not consider the different construction methodologies utilised within the Scottish home building sector. Recent NHBC<sup>4</sup> statistics show that 70% of new homes registered in Scotland are constructed using timber frame, compared to just 8% in England, and 13% on average throughout Great Britain. It is likely that construction methodologies would significantly impact the cost assumptions made within the report to both the cost to developers as well as costs for future accessible provisions.

It has been noted by HFS members operating across the UK that home building in Scotland is consistently more expensive when compared with England<sup>5</sup>. The cost differential is noted to cause particular strain on companies operating across borders, with Scotland competing for investment and funding. Placing additional burden upon development costs in Scotland would only go to further dis-incentivise future investment.

Given the numerous design challenges facing the industry, fully prescribing Lifetime Homes Standards is likely to impact upon the industry's ability to deliver smaller 'affordable' homes for sale, such as starter homes. With the additional costs to increase building footprints to incorporate enhanced provision, as well as inclusion of future provisions, it is likely that may home builders could abandon starter homes, further impacting upon housing affordability. Additionally buildings with a larger footprint, would also impact upon site layouts either resulting in developments utilising more land to deliver the same number of units, or reducing the number of units delivered upon the available land.

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<sup>3</sup> HFS Technical & Environment Advisory Group on Building Standards & Sustainability

<sup>4</sup> NHBC Housing Market Report, January 2015

<sup>5</sup> HFS members often note that differences in building standards, labour and material costs, and differences in construction methodologies add to the construction costs of new homes in Scotland.

Subsequently, additional costs would be ultimately borne by the customer. The additional costs of land, size of building, additional features, would be incorporated into the cost of the new home. This would leave the industry in a bizarre situation of charging customers for many features that were simply not demanded or needed by the majority of consumers. It is also questionable whether any additional value would be attributed to the features by surveyors, particularly if they are not features that are demanded by the majority of the buying public. Interestingly, member feedback suggests that only a handful of clients have requested variations to incorporate accessibility conversions on plots since the introduction of accessibility standards in 2007.

### **10% Fully Wheelchair Accessible Homes**

Both Homes for Scotland home builder and Registered Social Landlord (RSL) members raised concerns regarding the impact of a blanket approach to the delivery of fully wheelchair accessible homes in Scotland. Both sets of members suggest that any solution to the delivery of fully wheelchair accessible homes must be demand led. Given that a blanket approach would result in the delivery of homes in areas where there may be no demand for fully wheelchair accessible units, RSLs may struggle to rent, and private developers sell these properties, meaning that these properties are potentially left empty or utilised by individuals without specific needs. It was further noted that through Equality Legislation it would be unlikely that the industry would be able to restrict the sale or use of these homes solely to wheelchair users. Demand, therefore, must be demonstrated and evidenced at the outset of a development, potentially included within Local Housing Strategies, and carried out as part of the planning process. This demand should be broken down by local authority area and by tenure type including private sale, social rent as well as intermediate tenures. A targeted approach would be most effective in ensuring enhanced standard homes are delivered in the right areas.

### **Conclusion**

Homes for Scotland would stress the point that new homes built today's standards predominantly align with the majority of the requirements outlined within the Lifetime Homes Standard. Over-prescriptive standards would only go to limit the ability of the industry to optimise design solutions to meet the specific challenges that occur on particular sites. Removal of this flexibility would place a significant burden upon the delivery and affordability of new homes in Scotland.

HFS would additionally like to highlight that campaigns such as this only go to further highlight the need for politicians to work with industry stakeholders to tackle the current housing crisis. Housing needs to be a key priority within future parliamentary business, requiring cross party consensus in delivering a sustainable long-term strategy that supports industry increase the number of new homes being delivered in Scotland year on year, to meet growing housing demand, as well as helping alleviate the associated issues that stem from a lack of supply, highlighted by this petition.

With only around 15,000 new homes being delivered annually in Scotland, and 2.4 million existing homes<sup>6</sup>, as a country we are only replacing old homes at a rate of 0.63% per annum. The parliamentary committee must acknowledge that the real problem lies within the housing stock that already exists in key locations which is difficult to adapt. New homes being built to today's standards already achieve a high standard of accessibility. Further enhancement, or

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<sup>6</sup> Housing Statistics for Scotland: Key Information & Summary Tables – The Scottish Government (Accessed Thursday 23 April 2015)

blanket approaches to the delivery of homes to enhanced standards will increase build costs, and result in a reduction in the number of homes being delivered. We suggest that what is being proposed by the petition is therefore, in our view, not an appropriate solution.