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TL/HS/Public Petition 1554
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11 May 2015

Dear Ms Robinson

Public Petition 1554 (Disabled Friendly Housing)

I write to provide a response on behalf of Scottish Borders Council to your letter dated 1 April 2015.

This response has been informed by comments from Officers working in the Council's Housing, Planning, Building Standards Teams, and by drawing upon comment and information provided by locally active Registered Social Landlords (RSLs).

We note the reference to "Lifetime Homes" which is not terminology widely used in the Scottish Housing Industry, but which is more commonly used in England. "Housing For Varying Needs" designs standards are more commonly used in Scotland, and are used as a condition of grant to RSLs to assist new housing delivery. I understand that the latter provides an enhanced standard if direct comparison were to be drawn between them.

Similarly, it is considered that "Disabled Friendly Housing" is more of an aspirational objective, rather than an industry terminology standard per se.

However, it is not my intention to become bogged down in terminology or classification, but rather to focus on how best to meet identified and future needs.

I write to respond as per the 3 specific questions in the letter dated 1 April 2015:

1. Whilst the Council supports providing homes that can be used and easily adapted for people who are or have or become disabled, we do not support what the petition requests.

The present Scottish Building Standards system, through the Domestic Technical Standards, already requires that new home are designed and constructed in such a way that occupants and visitors are provided with safe, convenient and unassisted access to dwellings.

These present Building Standards also require that within the dwelling, safe and convenient means of access is provided throughout the dwelling, which includes the provision of stairs to be able to be fitted with a chair lift at a future date should the need arise.

Dwellings should also presently have one level that allows unassisted access throughout it and this level should contain one 'accessible' apartment, a kitchen and a toilet, wash basin and shower/bathroom facility that is accessible to a disabled person. This bathroom facility already requires provision of activity and manoeuvring spaces to the toilet, wash basin, shower or bath with robust construction provision in the walls to allow later fitment of grab rails, etc. Similarly the kitchen facility and the 'accessible' apartment also require to have activity and manoeuvring spaces that allows them to be used by people with disabilities.

Other aspects of the Building Standards presently cater for elements of the construction that allow dwellings to be used by everyone, such as the location of switches and socket outlets as well as other manual controls.

These Building Standards mentioned above presently cover minimum door and corridor widths, activity spaces and minimum space standards as applicable, ramp design, provision of and for grab rails, etc. The present regulations also cover accessibility arrangements within communal areas serving flats and dwellings, including lift provision in blocks over 4 stories high.

The present Scottish Building Standards are minimum standards, but in terms of accessibility and adaptability they presently set a very high standard.

The 'Lifetime Homes' Standard seems to duplicate, in some respects, what is already provided within the Regulatory system as per the Scottish Building Standards.

Providing the present level of accessibility provision in houses comes at a cost to developers and those who may be commissioning their own home being built. It would be unreasonable to expect house builders to go beyond the present minimum Building Standards, which are already considered to be high. Any additional costs incurred in house building would require to be passed onto the customer. It is also important to be proportional when imposing accessibility standards on housing.

'Lifetime Homes' is also seeking that 10% of new homes are built to a fully wheelchair accessible design. This is considered as not being a realistic or sensible proposal given what the present standards require and also the effects it would have on the construction industry. Such a blunt policy instrument would have big implications for the house building industry in the delivery and targeted marketing of these homes. Indeed construction is one matter, but for this to be effective there would have to be some form of occupancy condition to ensure that disabled people could live in such homes. Would 10% of new homes be marketable? How would you apply 10% of new homes to individual house builders or one off builds? Besides build rates for all new houses within Scottish Borders are currently very low, with the Registered Social Landlords providing almost as much as the private sector. This may be something that should be better left to the Registered Social Landlord [RSL] sector or Landlord Councils who typically have good information regarding house type/size need and demand and mismatch at locality or neighbourhood level. This needs based approach facilitates an investment prioritisation and programming approach to new housing delivery.

However, it might be useful to consider potentially incentivising developing RSLs to deliver more wheelchair standard houses if a grant premium were to be introduced per unit to recognise the higher costs incumbent in wheelchair housing delivery.

2. Scottish Borders Council is a post housing stock transfer Council, and works closely with locally active RSLs. Information provided by these RSLs indicate that there are 165 wheelchair standard properties owned by these RSLs within this Council's area. The Council's Housing Strategy Team have no corresponding information to even estimate comparable private sector provision. In the absence of such available information, the assumption is that there are none.

Scottish Borders Council is the 6th largest Scottish Council in terms of geographic area, and with the exception of 6 small towns, it is considered to be "accessible rural" and "remote rural" using Scottish Government's land classification methodology. Public transport services, are typically less frequent and commercially developed than in more urbanised Council areas, and people tend to be much less mobile in the areas of housing search. Therefore our experience in providing housing and services recognises that locational considerations are paramount, with individuals typically preferring to seek to stay put through adaptation of their house in both the RSL and private sectors rather than move out with their town or village settlement, eg even to a wheelchair standard house. There is a large stock of houses which have been adapted, but these generally speaking fall far short of wheelchair standard.

Our experience is that once a wheelchair standard house is let, it will be a long time before it becomes available for re-letting again. Officers remain keen to work with RSLs to deliver additional wheelchair standard housing, to meet identified needs, but doubt if the proposed 10% quota is the most effective way of doing this.

3. As a post housing stock transfer Council, Scottish Borders Council does not hold or operate a traditional housing waiting list.

Three of the largest RSLs based and active in Scottish Borders collaborate to operate a Common Housing Register to enable households to register to be housed by using a single application form. These RSLs cover the whole Scottish Borders area, and their information is considered to be the best proxy indicator of the demand for wheelchair standard housing. Most current information dated 31/3/2015 indicated that there are 4375 households registered on their Common Housing Register, of which 72 households have indicated that they are seeking wheelchair standard or accessible housing.

I hope this is of assistance.

Yours sincerely

Tracey Logan
Chief Executive