

Sections 1 to 5 – People's needs, sizes and dimensions, location of housing, the design of the surrounding environment, and housing layout and building form

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?

I agree with the proposal

Please explain the reasons for your answer.:

This is an understandable decision given the clauses are already comprehensive and the likelihood that the specific requirements for accessible housing haven't changed significantly since the initial assessment. This approach enables policymakers to focus on the evolving technical details of accessible housing particularly with advances in technology which is changing the way we live.

Section 6 – The overall plan of the dwelling

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

I agree with all of the proposals

Please explain the reasons for your answer.:

It is reasonable to remove the clauses that are now superseded by building standards as it simplifies the comparison and ability to identify the different requirements of homes built under the Housing for Varying Needs guidance.

Section 7 – Access to dwellings and provision for vehicles

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:

I agree with some but not all of the proposal

Please explain the reasons for your answer.:

We are concerned that requiring all entrances to dwellings to be step free may be impractical and costly. It is reasonable to have at least one entrance to the dwelling step free but there may be instances where the topography or land is not suited to having all entrances step free. Constructing step free entrances is not always the most cost-effective option and these additional costs will have to be considered.

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?

I agree with the proposal

Please explain the reasons for your answer.:

5 How do you feel about the proposals for the rest of the clauses within Section 7 of Part 1 of the current guide, as set out in Annex G of the consultation paper?

I agree with some but not all of the proposals

Please explain the reasons for your answer.:

As mentioned previously we do not agree that all entrances should be step-free but it is understandable to remove the clauses which have already been adopted in building standards.

Section 8 – Communal access areas, stairs and lifts to flats

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

I agree with all of the proposal

Please explain the reasons for your answer.:

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

I agree with some but not all of the proposal

Please explain the reasons for your answer.:

We understand that the installation of automatic opening doors will greatly improve accessibility but note the government's indicative cost of implementing this is high at £1733 per dwelling. It is unclear whether this figure accounts for the costs of maintenance and repairs which will be inevitable. The reliance on automatic opening could also result in accessibility issues should the mechanism breakdown. We agree that fobs or similar are safer and easier to use.

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?

I neither agree nor disagree with the proposal

Please explain the reasons for your answer.:

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

I agree with all of the proposal

Please explain the reasons for your answer.:

It is unclear whether this is a requirement or not, but we do not see an issue with different decoration.

10 How do you feel about the proposals for the rest of the clauses within Section 8 of Part 1 of the current guide, as set out in Annex H of the consultation paper?

Not Answered

Please explain the reasons for your answer.:

Section 9 – Entrance doors to individual housing or flats

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:

I agree with all of the proposal

Please explain the reasons for your answer.:

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?

I agree with the proposal

Please explain the reasons for your answer.:

We support this proposal.

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

Not Answered

Please explain the reasons for your answer.:

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

I neither agree nor disagree with the proposal

Please explain the reasons for your answer.:

We understand that this proposal is recommended by health professionals to improve the accessibility of those in larger wheelchairs. However, we underscore the consideration of additional costs involved which amount to £960 for a two-bed dwelling or £1600 for a three-five bed dwelling. It is important to strike a balance between meeting the essential needs of occupants and the costs, as excessive expenses can create viability challenges for developers.

15 How do you feel about the proposals for the rest of the clauses within Section 9 of Part 1 of the current guide, as set out in Annex I of the consultation paper?

Not Answered

Please explain the reasons for your answer.:

Section 10 – Circulation spaces and internal doors

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:

I neither agree nor disagree with the proposal

Please explain the reasons for your answer.:

Again, we understand the need for improved accessibility for wheelchair users but underscore the associated cost of the proposed requirements for multi-story semi-detached houses.

17 How do you feel about the proposal:

I disagree with all of the proposal

Please explain the reasons for your answer.:

At an estimated cost of £21,400, the installation of a lift will add significantly to developers' costs and thus is likely to affect the viability of the build unless the costs are passed onto the tenant / buyer. The consultation fails to identify who will be responsible for the maintenance of this lift and the costs associated with this. This cost of installation and maintenance over time could extend beyond people's ability to pay especially if this is to be 'affordable housing'. The need for additional space to accommodate the lift also poses design challenges. It is crucial that the needs of the occupants are assessed to determine the necessity of an internal lift. Where possible, houses constructed specially for wheelchair users should be floor level only.

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:

I agree with all of the proposal

Please explain the reasons for your answer.:

19 How do you feel about the proposals for the rest of the clauses within Section 10 of Part 1 of the current guide, as set out in Annex J of the consultation paper?

Not Answered

Please explain the reasons for your answer.:

Section 11 – Living and sleeping areas

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

I neither agree nor disagree with the proposal

Please explain the reasons for your answer.:

Again, attention to the additional costs of compliance (estimated at £4900-£6000) must be considered. The proportion of those who will require this is relatively small compared to a large percentage of the population who don't. Due to the additional costs required, the guide should be flexible and proportionate rather than creating a one-size-fits-all approach that will benefit very few people.

21 How do you feel about the proposals for the rest of the clauses within Section 11 of Part 1 of the current guide, as set out in Annex K of the consultation paper?

Not Answered

Please explain the reasons for your answer.:

Section 12 – Storage

22 How do you feel about the proposals for Section 12 of Part 1 of the current guide, as set out in Annex L of the consultation paper?

Not Answered

Please explain the reasons for your answer.:

Section 13 – Kitchens

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

I agree with the proposal

Please explain the reasons for your answer.:

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 degrees, that is a circular area of 1800mm diameter?

I neither agree nor disagree with the proposal

Please explain the reasons for your answer.:

Again, consideration of costs must be given as this requirement will significantly add to developers costs and thus could be transferred to the tenant or owner.

25 How do you feel about the proposals for the rest of the clauses within Section 13 of Part 1 of the current guide, as set out in Annex M of the consultation paper?

Not Answered

Please explain the reasons for your answer.:

Section 14 – Bathrooms and WC compartments

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:

I neither agree nor disagree with the proposal

Please explain the reasons for your answer.:

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

Not Answered

Please explain the reasons for your answer.:

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

Not Answered

Please explain the reasons for your answer.:

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

Not Answered

Please explain the reasons for your answer.:

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?

I agree with the proposal

Please explain the reasons for your answer.:

31 How do you feel about the proposals for the rest of the clauses within Section 14 of Part 1 of the current guide, as set out in Annex N of the consultation paper?

I agree with some but not all of the proposals

Please explain the reasons for your answer.:

Certain proposal not specifically consulted on above, may incur significant additional costs which may not always be deemed necessary. For example the requirement for a second WC for dwellings with 4 people or more could add significantly to the overall cost of a property.

Section 15 – Interior finishes

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

I agree with some but not all of the proposals

Please explain the reasons for your answer.:

Section 16 – Windows

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?

I neither agree nor disagree with the proposal

Please explain the reasons for your answer.:

This may not always be a practicable policy for the delivery of an otherwise wholly suitable and attractive home.

34 How do you feel about the proposals for the rest of the clauses within Section 16 of Part 1 of the current guide, as set out in Annex P of the consultation paper?

I agree with all of the proposals

Please explain the reasons for your answer.:

This section is largely superseded by the Building Standards technical handbook and therefore is not needed.

Section 17 – Heating, ventilating and water services

35 How do you feel about the proposals for Section 17 of Part 1 of the current guide, as set out in Annex Q of the consultation paper?

I agree with all of the proposals

Please explain the reasons for your answer.:

We support the alignment with the Building Standards Technical Handbook.

Section 18 – Power and communications

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

Not Answered

Please explain the reasons for your answer.:

37 How do you feel about the proposals for the rest of the clauses within Section 18 of Part 1 of the current guide, as set out in Annex R of the consultation paper?

Not Answered

Please explain the reasons for your answer.:

Section 19 – External facilities

38 How do you feel about the proposals for the rest of the clauses within Section 19 of Part 1 of the current guide, as set out on Annex S of the consultation paper?

I agree with some but not all of the proposals

Please explain the reasons for your answer.:

The stipulation of soil bedding depth is disproportionate and unlikely to be necessary for all circumstances.

Section 20 – Refurbishment and adaptations

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?

I agree with the proposal

Please explain the reasons for your answer.:

Any other proposed changes to Part 1 of the guide

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

Not Answered

Please explain the reasons for your answer.:

Format of the updated guide

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

Yes

Please explain the reasons for your answer.:

The updated guide needs to be clear and plain spoken. It should signpost to the Building Standards Technical handbook clearly.

The Scottish Accessible Homes Standard

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?

I agree with some but not all of the proposed exceptions

Please explain the reasons for your answer.:

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?

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

Please explain the reasons for your answer.:

We have reservations that applying all of the criteria in Table 1 to all new housing could add significant size to homes, costs and indeed add pressure to all already stretched supply chains. In culmination, this could undermine the supply of new housing.

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?

Don't know/ no opinion

Please explain the reasons for your answer.:

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?

Don't know/ no opinion

Please explain the reasons for your answer.:

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?

Don't know/ no opinion

Please explain the reasons for your answer.:

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

Yes

Please explain the reasons for your answer.:

We welcome the move towards instilling 'future-proofed' design guidance on accessibility within homes, and indeed support the intention to aid people to continue to dwell in their homes for as long as practically possible. However, if the Scottish Accessible Homes Standard is to become the standard for homes of all new tenures there needs to be a full – and not a partial – regulatory impact assessment of the costs and implications of such a move. We do have a concern that by applying these high standards to all new homes of all tenures, we may inadvertently reduce the practical supply and delivery of new housing to Scotland.

Impact assessments

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

Don't know/ no opinion

Please explain the reasons for your answer.:

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

Don't know/ no opinion

Please explain the reasons for your answer:

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

Yes

Please explain the reasons for your answer.:

Our main concern is that it prohibits or makes new or adaptive housing expensive to deliver. If so, this could restrict the access to affordable housing for people with socio-economic disadvantages.

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

Yes

Please explain the reasons for your answer.:

The proposals should be supportive of young people's wellbeing and rights.

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?

Yes

Please explain the reasons for your answer.:

We welcome the moves to improve the accessibility of homes and to supersede aspects of the Housing for Varying Needs and Scottish Accessible Homes Guidance to align with Scottish Building Standards. However, we are concerned that the overall supply of new housing may be reduced as a result of additional costs of construction and refurbishment incurred by applying accessibility standards across the board for all housing.

About you

53 What is your name?

Name:
Scottish Property Federation

54 What is your email address?

Email:
spf@bpf.org.uk

55 Are you responding as an individual or an organisation?

Organisation

56 What is your organisation?

Organisation:
Scottish Property Federation

57 The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

58 We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

59 I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent

Evaluation

60 Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Slightly satisfied

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Please enter comments here.: