



Enhancing the accessibility, adaptability and usability of Scotland's homes

GWSF response to Scottish Government consultation, December 2023

1 Introduction

On behalf of our 64 member associations, GWSF welcomes the opportunity to comment on the consultation.

The review of the long-standing Housing for Varying Needs standards had been eagerly awaited for many years. At the time of their introduction in 1998, they were the centrepiece of an approach – often characterised by the terms ‘lifetime homes’ or ‘barrier-free housing’ – which moved away from thinking about disability or ‘special needs’ and instead to how every mainstream home (funded through the Affordable Housing Supply Programme) should be designed to cater for a wide range of needs. The principle was that the needs of a parent with young children needed to be taken account of every bit as much as those of older and disabled people.

Ground-breaking though the HVN standards were, inevitably the world has moved on in 25 years, as most recently illustrated by the additional space requirements highlighted after the pandemic – internal space for children to play and do schoolwork, and external play space too.

We note that the most radical part of the consultation relates to the proposed new Scottish Accessible Homes Standard for all new homes, which will be implemented through changes to building standards and guidance from 2025-26. This most directly impacts on private developers, who up till now have been impacted only where providing social and affordable housing through the AHSP. Whilst this will largely be for the representatives of private developers to comment on, we make a few observations on this below.

2 GWSF welcomes the revised standards to Part 1 of HVN

Fundamentally GWSF welcomes the consultation and, in particular, the proposed revisions to Part 1 of the HVN standards that apply to all mainstream ‘general needs’ housing funded through the AHSP and to be reflected in the Building Standards for all new homes from 2025/26.

Our members have not raised any specific concerns about particular design proposals themselves. These seem sensible modernisations of the original standards, being largely around key factors such as the circulation space needed in entering homes and being able to use the amenities within the home without unnecessary barriers. We comment on the cost implications below.

On terminology, we note the proposal to retain use of the terms 'older people's housing' and 'ambulant disabled housing'. GWSF has no strong feelings on this, but we do believe that both terms have become almost redundant as standards in mainstream ('general needs') housing have improved over the years. Part 2 of the HVN standards remain relevant to the production of any new specialist housing with support (notwithstanding that they have not been updated), but in mainstream housing the notion of different design standards for housing that might generally be allocated to a particular client group (other than wheelchair users) is becoming obsolete – especially so in relation to the term 'ambulant disabled people'.

3 Space and cost implications

In modernising the HVN standards, there was always a risk of effectively asking providers of new housing to cater for more and more needs within the same overall building envelope. We welcome the attempts to identify the additional space implications of each improvement individually and then of the cumulative additional space requirements. Our sense, though, is that some of these may have been underestimated, and we would defer to the expertise and experience of those with substantial practical experience of meeting HVN standards and who are well placed to estimate the additional space required. In particular we would commend the assessment made by MAST Architects for a membership session run by the Scottish Federation of Housing Associations in November.

Clearly, getting these assessments of additional space requirement right is essential in then estimating the additional, overall costs. The Scottish Government has recognised – during the consultation sessions – that cost estimates are from around November 2022. Construction industry inflation has risen substantially about general inflation since that time, and this now has to be factored in.

But over and above inflationary impacts, there looks to be some (and quite probably significant) underestimation of the costs of the additional requirements. With so many new requirements for new homes in recent years, including on fire safety and energy efficiency, there has always been the risk of underestimating the additional costs. In practice this has the effect of making requests for grant which are even more above benchmark than might already have been the case. This in turn can mean delays in making technical assessments of the bids, and reluctance of funders to provide grant substantially above benchmark.

The consultation has estimated that the average additional cost per home of meeting the new requirements is £2,560 (albeit at November 2022 prices). The architectural practice referred to above has estimated the additional cost to be nearer £10,500.

In short, GWSF would not want to see these welcome improvements in standards contribute further to the already faltering Affordable Housing Supply Programme, so assessments of the additional space and cost implications need to take account of the expert views of architects and others who have a track record in supporting social landlords to meet HVN and other standards over a long period of time.

4 Scottish Accessible Homes Standard

The more fundamental change being proposed in this consultation is that HVN effectively becomes a new Scottish Accessible Homes Standard which will apply across all tenures and therefore be a new requirement for private developers building private housing outwith the Affordable Housing Supply programme.

We recognise that developer representatives will have concerns about the impact of this proposal, though it remains to be seen exactly how that sector responds. In GWSF's view this proposal is appropriate and timely: why would Scotland aim to cater for normal, everyday needs in the design of social and affordable housing but not private housing? We know some people are effectively forced to seek social housing to meet their needs not primarily because they can't afford private housing but because it simply doesn't meet their needs. A universal standard will genuinely increase choice and might even take a small amount of pressure off the social housing sector.

A further, positive outcome if the new cross-sector standard were to be implemented would be greater clarity over private housing handed over to social landlords, whether through Section 75 arrangements or off-the-shelf purchases. Currently there is insufficient, robust evidence that housing procured through these routes adequately, let alone fully, meets HVN standards.