Introduction

The Independent Living in Scotland Project (ILiS www.ilis.co.uk) aims to support disabled people in Scotland to have their voices heard and to build the disabled people’s Independent Living Movement (ILM). Part of Inclusion Scotland, ILiS is funded by the Scottish Government Equality Unit to make the strategic interventions that will help to make independent living the reality for disabled people in Scotland. ILiS co-ordinates the Accessible Housing Ambitions group that includes Glasgow Centre for Inclusive Living, Capability Scotland, Horizon Housing Association, Blackwood, the Scottish Older People’s Assembly and the Scottish Disability Equality Forum.

ILiS welcomes the opportunity to provide its views to the Committee on the draft budget and presents its comments in relation to the housing budget allied to delivery of Scottish Government's commitment to 50,000 new homes, of which 35,000 affordable. Our submission draws on information, experience and knowledge of the partners in the Accessible Housing Ambitions Group.

The Scottish Government's commitment to new homes must be linked more strongly to its parallel strategic objectives in terms of the national health and wellbeing outcomes associated with health and social care integration, and associated shift of resources from institutions to communities. The Committee's questions regarding Strategic Planning Agreements and subsidy supports are highly relevant to this and we largely restrict our response to these.

Given our collective focus on meeting disabled people and older people's housing needs in Scotland we were pleased to see the Scottish Government explicitly acknowledging in the draft budget that accessible, affordable, energy-efficient housing can 'contribute significantly to their wider aims to tackle poverty and health inequalities and to build confidence and capacity in communities'.

This is the first time to our knowledge that a Scottish draft budget has acknowledged the need for accessible housing in Scotland as a distinct and additional category to affordable, high quality housing.

However, our concern is that this acknowledgement is not followed up by any explicit commitment to focussing investment on significantly increasing the supply of accessible housing with sufficient space standards to meet disabled and older people's needs into the future. Given the demographic challenges Scotland faces we believe this omission must be addressed immediately.
In relation to the draft budget proposals on housing we therefore want to see the Scottish Government’s commitment to building 50,000 affordable homes by 2021 playing a part in making a difference to the lives of disabled and older people.

For this to be a reality a proportion of these new homes need to have sufficient space standards to make them wheelchair accessible, or easily adapted to be so. We respond to the questions below in this context.

A 2012 analysis based on the Scottish House Condition Survey 2009/10, census and Scottish House Condition Surveys shows that there are around 119,800 households with a wheelchair user in Scotland (5.1% of all households).

This analysis, contained in Mind The Step: An estimation of the housing needs of wheelchair users in Scotland (2012, L Watson et al, published by Horizon Housing Association and the Chartered Institute of Housing) provided an estimate of the number of wheelchair user households in Scotland with unmet housing needs - 17,042 households (14.2% of all wheelchair user households).

**Question 6: To what extent do the Resource Planning Assumption and the Strategic Local Planning Agreements processes effectively enable local housing needs to be prioritised and resourced?**

It is not possible to comment in detail on Resource Planning Assumptions for 2017/18 as the RPAs have yet to be published.

We do not believe that Strategic Local Planning Agreements effectively enable the local housing needs of disabled people to be established, prioritised and resourced. We believe that a national strategic intervention is required to address this. There is a concern that Localism could result in further fragmentation - perhaps even lead to a reduction in the supply of accessible housing at the very time that demographic evidence suggests we need it most.

In Scotland between 2014 and 2039 we will see an 85% increase in the number of people 75 yrs or older. This equates to an extra 370,000 older people in Scotland, many of whom will have health issues, long term conditions or be disabled. This means we are effectively adding towns equivalent in size to Paisley, East Kilbride, Livingston, Cumbernauld, Dunfermline and Perth but where everyone living in them is over 75 years old.

If we do not future proof Scotland’s housing stock in terms of sufficient space standards to provide for future adaptations we are creating a ticking time bomb that will have significant implications for services, housing and support all across Scotland.
Within and around the home, accessibility – allied with space – is a major determinant of well-being for disabled people; particularly as they get older or experience a change in relation to their impairment/s.

Whilst increased awareness of the issue of accessible housing in Scotland has undoubtedly brought progress over the last twenty years, we still lack a strategic approach to policy and practice which is logical and coordinated.

As well as considering the rate at which we should expect to compensate for the current shortfall in accessible housing, we need to address the level, or levels, of accessibility which are appropriate in relation to demographic evidence about our age and mobility. This needs to happen at national and local level to address variations in existing stock as well as differing needs arising from local demographic trends.

We believe at present that there is a tacit assumption amongst housing professionals and other key decision makers in Scotland that Housing for Varying Needs design guidance for social rent, current building standards in the private sector and the provision of adaptations by Local Authorities and Housing Associations are meeting the housing needs of disabled people. In short: the work around accessibility has already been done.

The picture on the ground is very different. Disabled people continue to tell us and our partners that finding a house in Scotland that meets their needs can be fraught with difficulty. Capability Scotland’s “1 in 4 Poll” in 2015 with over 550 disabled people showed that 75% of respondents felt that disabled people do not have equal access to suitable housing in Scotland, with the main barrier to accessing housing perceived as not enough new-build accessible housing. Other barriers included lack of specialist housing advice, not enough low cost housing, lack of private accessible rented property and disabled people finding it difficult to get help to adapt their home.

The failure of the current housing system to meet the needs of disabled people is particularly acute in relation to wheelchair users.

Glasgow Centre for Inclusive Living and other Disabled Person’s Housing Services (DPHSs) across the country are frequently made aware of cases where wheelchair users are living in houses that do not meet their needs.

These real life scenarios include:

- Wheelchair users not being able to enter and exit their homes without support
- Parents of disabled children being unable to wash their children at home because their bathroom is too small to enable the transfer from a wheelchair
• Inaccessible housing that has caused disabled people to fall out of their wheelchairs and injure themselves leading to hospital stays and a heavier reliance on health and social care services

The following case study from Fife Disabled Person’s Housing Service involving a wheelchair user being discharged from hospital serves to illustrate the failure of the housing system in Scotland to anticipate and meet the needs of wheelchair users:

‘We have been working with a 49 year old disabled women who was discharged from hospital 7 years ago after a major stroke. She was discharged into sheltered housing for the elderly so as to avoid her discharge being delayed. She was informed that the move would be temporary as the accommodation is not big enough to accommodate her use of an electric wheelchair – it doesn’t fit through the doors inside the house. She spends a significant amount of time sitting in her sitting room as she cannot independently mobilise inside her own house and needs additional care and support to function. She has to pay for additional care and support to access all parts of her house using her DLA but reports this would be unnecessary should the house be big enough to allow full use of her wheelchair. Fife’s Specialist Housing Team are aware of her needs but there are no wheelchair accessible houses available in the area she wants to live.’

We stress that these situations, if unresolved by housing providers and Local Authorities, can have direct human rights implications for disabled people in terms of a right to independent living and a right to respect for their private and family life.

Without a user-friendly accessible house, access to employment, education or even social and recreational opportunities is made even more difficult for disabled people.

Examples of constrains on effectiveness of RPAs and planning agreements in enabling effective prioritisation and resourcing in relation to wheelchair accessible housing are provided in an analysis of Housing Contribution Statements provided in Appendix 1

Conclusions from this analysis

What we see from this analysis is that the housing needs of wheelchair users across Scotland are not being consistently considered, evidenced and addressed in Strategic Local Planning Agreements. Provision is piecemeal and is not meeting demand. We believe it is time to take national action to address this.

We believe that the draft budget, the Scottish Government’s Joint Housing Delivery Plan and each Local Housing Strategy, Strategic Housing Investment Plan, Housing Contribution Statement and Local Development Plan at Local Authority level needs to explicitly engage with addressing the current shortfall in accessible housing across Scotland.
We need appropriate decision makers to commit to ensuring that 10% of new build developments of 20 or more units for sale or rent are built to, or easily adaptable to wheelchair accessible standard. This is necessary to address the current and future housing needs of wheelchair users across Scotland.

We are also aware through our work to promote the co-production of Local Housing Strategies with disabled people that the majority of Local Authorities do not actively engage disabled people in the development of Local Housing Strategies and Local Development Plans. They may seek to ‘consult’ with disabled people and their allies after a planning agreement has been developed but we are aware of only two Local Authorities, North Lanarkshire and Argyll and Bute who have committed to and adequately resourced genuine co-production with disabled people in this regard, and this was part of a pilot scheme.

In order to make lasting changes to the housing system in Scotland of benefit to disabled people we also believe that there needs to be a wholesale approach to engaging disabled people in the process of co-producing Strategic Local Planning Agreements in order that disabled people’s housing needs are consistently addressed in strategic housing development across Scotland.

**Question 7: We seek written responses on whether the increased subsidy levels will support new housing developments; and in particular whether the flexibility in subsidies will improve the provision of housing for older people or for people with particular needs.**

The Scottish Government’s commitment to new homes offers a significant opportunity to address unmet needs for accessible homes which can support the independent living needs and aspirations of Scotland’s disabled and older people.

Following the recommendations of the 2015 Subsidy Working Group, the subsidy benchmarks at which RSLs and councils are expected to build new homes has been increased by up to £14,000 per unit. We welcome this increase but see that the current subsidy arrangement needs again to be reviewed to consider incorporating a level of additional grant targeted at improving provision by encouraging building to wheelchair user standard in all tenure types. This should include new tenure forms such as mid-market rent and new supply shared equity.

We believe it should be possible, as it has been for the “greener” and “rural” higher subsidy elements of Housing Association Grant to provide additional funding for the development of housing with space standards adequate for the needs of wheelchair users, older people and families with children.

Horizon, in 2012, assessed the value of the extra space and inclusive design requirement at £10,000 per property, while Blackwood in it’s recent concept homes
assesses this in the region of £18,000, the latter being for more than the enhanced space standards.

Conclusion

In summary, to meet the current needs of older and disabled people and the demographic challenges of the future in relation to housing the Scottish Government needs to firmly commit to investing in accessibility, involving disabled people in the creation of strategic housing plans and providing additional subsidy for larger houses.

APPENDIX 1: ANALYSIS OF HOUSING CONTRIBUTION STATEMENTS IN RELATION TO STRATEGIC PLANNING FOR RESOURCES TO SUPPORT PROVISION OF HOUSING TO WHEELCHAIR STANDARD

An analysis of Housing Contribution Statements\(^1\), which provide a link between the local strategic planning process for housing and that of health & social care, provides a useful illustration of why we believe this national strategic intervention is necessary.

East Ayrshire, East Renfrewshire, North Lanarkshire and South Ayrshire have all developed their Housing Contribution Statements as part of their Joint Strategic Commissioning plans for reshaping care for older people. There is therefore no attention paid to providing housing for wheelchair users of working age. Where they have considered the need for accessible housing, this is limited to provision for older people, and in many cases is limited to design for dementia.

Aberdeenshire has produced a general needs Housing Contribution Statement and have stated that 15% of new build affordable homes will be developed each year for those with ‘particular needs’, but again this has considered accessibility only in relation to housing for older people. The statement discusses ‘encouraging’ the private sector to assist in meeting the market demand for accessible new build housing, but no target is given and again this is purely in relation to housing for older people.

Dumfries and Galloway make no mention of physical disability, accessibility or the need to provide wheelchair accessible housing in their Housing Contribution Statement or Local Housing Strategy, despite the fact that the Housing Demand and Needs Assessment identifies unmet need for 157 wheelchair accessible properties and states that over 800 households with particular needs are living in accommodation that they describe as ‘not well suited’ to their current needs.

Argyll & Bute have provided a clear description of current unmet need in relation to wheelchair users, identifying up to 100 households with an unmet housing need.

\(^1\) As 8 Local Authorities have either yet to develop their Housing Contribution Statement (HCS), or have a produced a joint HCS with partners, this analysis is based on 24 statements.
However, they have suggested that the majority could be met via adaptations and turnover in existing stock, and that there is likely to only be a small-scale requirement for purpose-designed new build homes. Again this is seen through the prism of older people with the HCS stating that 48 people aged 65+ require wheelchair access/ramp adaptations to their homes with no indication of need from wheelchair users under 65. Despite independent living being one of the four priorities in the Local Housing Strategy there is no firm commitment in the HCS to meeting these needs.

East Lothian have committed to establishing a ‘joint evidence base to identify housing requirements for older and disabled people to identify specialist housing requirements early in the planning of the Affordable Housing Programme’. This evidence base should provide a ‘cautious estimate for the provision of specially designed and supported housing’. At present 16% of the 479 new affordable homes built between 2009 and 2015 (76 houses) are meeting specific housing needs through amenity and wheelchair provision, however there is no specific commitment within the Local Housing Strategy to addressing future needs of wheelchair users.

East Renfrewshire’s treatment of wheelchair accessible housing in their HCS is limited to attempts to calculate the number of wheelchair users in the area. This is taken from responses to the Council’s tenants housing survey from respondents who use a wheelchair. 7.6% of all respondent households reported they use a wheelchair for at least part of their daily activities. Of these only 3 respondent households reported they use a wheelchair both inside and outside. This is likely to be a very significant underestimate of the numbers of wheelchair users who may have unmet housing needs in East Renfrewshire. Measuring the provision of wheelchair accessible units is included as a strategic indicator in East Renfrewshire’s Local Housing Strategy but there is no indication of current and future need and strategies to meet it.

Inverclyde recognise in their HCS that new builds built to current building standards do not meet the needs of all wheelchair users and claim that the Local Housing Strategy ‘continues to promote the development of wheelchair accessible and lifetime homes across all tenures’. However, given that there is no target included for provision in Inverclyde’s LHS, there is no method to evaluate what impact, if any, these positive statements have made.

There are a few Local Authorities in Scotland who are using Strategic Local Planning Agreements to specifically engage with meeting the housing needs of wheelchair users.

Glasgow and Edinburgh City Councils both have city-wide targets for the provision of wheelchair accessible housing, due in large part to the older, flatted profile of homes in both cities that in many cases cannot be adapted.
Edinburgh City Council has established a programme for accessible homes for people with physical disabilities and complex needs within the city’s new build housing programme. This ensures that 10% of all new homes will be built to wheelchair accessible standards. Given that the council and partners aim to fund the delivery of 16,000 affordable homes over the next 10 years, this will amount to 1,600 wheelchair accessible properties. These assets may allow disabled people to begin an independent life, remain near their networks of support, and for those who become disabled to find a house that meets needs their previous accommodation did not.

The provision of fully wheelchair accessible housing through the Affordable Housing Investment Programme has been identified as an investment in Glasgow’s Strategic Housing Investment Plans (SHIPs) since 2009. Glasgow’s SHIP 2015/16 – 2019/20 – target is 40 units/year which represents 3.8% of proposed new affordable housing supply.

Since 2009, the Council has also operated a planning policy requiring all housing providers to submit a Design and Access Statement setting out how the needs of potential wheelchair users have been addressed in proposals for new build housing and in developments of 20 units or more. City Plan II provided a requirement to provide 10% of privately developed units in these developments to wheelchair standard, or readily adaptable to meet the standard.

However, even in this positive context there are troubling developments. Glasgow Centre for Inclusive Living and Glasgow Disability Alliance have both raised recent concerns that this target could be removed from Glasgow City Council’s latest Local Housing Strategy due to pressure from developers, reluctant to build larger homes for wheelchair access when the costs may not be reflected in the valuations.

It has also been difficult to evaluate how this target has actually benefitted wheelchair users in the city. According to the Glasgow Disability Alliance, 106 accessible homes have been built since the last 5 year strategy. However disabled members of GDA’s drivers for change group felt that this was ‘a drop in the ocean’, considering the number of disabled people waiting years for a suitable home, or for crucial adaptations to be made.

The Scottish Disability Equality Forum submitted a Freedom of Information Request in 2012 to determine how many wheelchair accessible new builds had been developed in Glasgow as a result of this planning requirement. When they investigated the planning applications for housing deemed to be wheelchair accessible they found a number of developments that were not level access but were second and third floor properties with lift access. Many wheelchair users are reluctant to rely on lifts as their only access, given the problems caused by lift failure or intermittent service.

Glasgow Centre for Inclusive Living are pertinently aware that there is a desire for wheelchair accessible private housing in Glasgow that is not being met, particularly provision of larger family home. Homes2Fit, GCIL’s accessible housing register
currently includes registrations from 75 disabled people who want to buy a wheelchair accessible property. 18 of these include families who require 3 bedroom properties or larger. As far as GCIL and GDA are concerned no-one is building wheelchair standard family housing for sale in Glasgow. This is a housing market failure.

Fife City Council set a target that 22% of the affordable housing programme should be provided for 'specialist' homes from 2010-2015. The specialist housing types being provided are wheelchair accessible and amenity housing with some additional extra care housing. This target was exceeded at 27%, this now forming the target for the affordable housing programme to 2017. The increasing need for accessible housing has been shown through the updated Housing Needs and Demand Assessment and have led to a new target of 30% specialist homes in programmes beyond 2017 set within the new Local Housing Strategy 2015-2020.

There are also positive developments with Moray Council new build house designs which have 'evolved over time, primarily through advice from local OTs, to exceed both Housing for Varying Needs requirements and current Building Regulations, in an effort to future-proof the layouts, minimise the need for, and cost of, future disabled adaptations, and facilitate self-care or unpaid care'. Common features include wetrooms to all ground floor units, door entry systems, and kitchens adapted to individual needs. However, disabled people have not been actively engaged in influencing this process.

In relation to the private sector Moray Council has also proudly stated in its Housing Contribution Statement that they are 'amongst the first in the UK to implement a planning policy which requires housing developers to provide 10% of their private sector units for sale designed to wheelchair accessible standards'.

In response to a Housing Demand and Needs Assessment which found a lack of appropriately designed private sector housing options for older and disabled people Moray Council has indeed implemented a planning policy (Policy H9) designed to improve accessibility.

Policy H9 does not however stipulate a 10% target and instead requires ‘housing proposals of 10 or more units to provide a ‘proportion’ of wheelchair accessible housing’. This requirement is also caveated by the following opt-out- ‘Flexibility may apply on less accessible sites and/or where an alternative acceptable housing mix is proposed.’

What we see from this analysis is that the housing needs of wheelchair users across Scotland are not being consistently considered, evidenced and addressed in Strategic Local Planning Agreements. Provision is piecemeal and is not meeting demand. We believe it is time to take national action to address this.

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