

Petitioner submission of 3 May 2023

PE1985/D: Evaluate Garages to Homes Developments

I write, as I am incredibly disappointed in the Scottish Government Response received 29 March 2023.

The Response states “we do not consider that there are any national implications to this proposal”.

This must be strongly refuted. I have documents which evidence the Registered Social Landlord (RSL), Scottish Borders Housing Association (SBHA), stating: “they hope that their feasibility and pilot could be rolled out nationally across Scotland”.

If full Scottish Government Funding is provided as sought, it is rational for every council and RSL with housing responsibilities to implement Garages to Homes as a lucrative means to meet affordable social housing demand.

I also refute the response relating to NHS and Social Care involvement, evidenced from the previously submitted Feasibility Study below.

Page 9, SBHA & BHA feasibility study states:

3.7 The assessment does not include other factors such as rental income, social factors, or demand for bungalows within the area. The assessment is based on whether the garages can be converted into Husk units and maximising the number of units to ensure that the average cost per unit is kept as competitive as possible. (Elvet, Husk, 2022)

These units do not appear competitive when you consider they cost around a staggering £160,000 to build and adapt to meet environmental requirements. Within current area housing prices, this is the equivalent of a 4 bed roomed house with garden. However, if Scottish Government funding becomes available, the unit cost is secondary.

We believe that our documents show SBHA tried to match demand for these units after selection, making what in my view is a false claim that

they are ideal locations for older adults and wheelchair users and that garage areas were unwanted or associated with anti- social behaviour.

The local Community Council have expressed concerns to planning, and like the First Minister below, propose that empty housing stock be reconfigured into good quality affordable housing with these benefits:

- Reduces empty housing stock
- Employment for local builders
- Maintain character of existing neighbourhoods
- Secure amenable locations for future tenants.

The Scottish Government Response also contradicts previous information from the Team of the now First Minister which stated:

“Humza is acutely aware of the challenges you have raised in your email regarding housing. As well as improving the provision of affordable homes, Humza stated that the policy will create work and jobs for small, local building firms and contractors who will be brought in to bring the properties back to a liveable standard.

Humza believes that part of this SNP Government’s investment in affordable housing should first be used to bring empty properties back to life so we can get more people into good quality, affordable housing. Regarding his position on Garages to Homes, Humza does not have any current plans to adopt such an approach as he is keen to ensure all new and converted properties are of not just tolerable but a high standard of quality and are capable of continued use well in the future.”
(Humza Yousaf, 2023)

As stated in the government’s response, “proposed new homes will be permanent, high-quality homes which will meet current Building Regulations, Housing for Varying Needs.”

There is no evidence of:

- Government verification of 60-year life span criteria of these recent prefabrications in England.
- Proposed or existing residential units in England meeting Housing for Varying Needs, 1998 Wheelchair Accessible Housing.

Wheelchair Accessible Housing

The access and design statement within SBHA planning application claims that the basis for their feasibility study and Pilot was there are over 2000 Wheelchair Users in the Scottish Borders.

The Scottish Government defines the minimum design criteria for Wheelchair Accessible Housing and this is not apparent in any existing or proposed conversions.

The Scottish Borders Council (SBC) **Strategic Housing Investment Plan (SHIP) 2023-2028** page 10

It was agreed that Registered Social Landlords (RSL) would provide 15 of the 20 wheelchair accessible houses that would be required annually. Again, SBC state the standard required is that of Housing For Varying Needs (HFVN) wheelchair standard.

This proposal does not meet the basic criteria for Wheelchair Accessible Housing.

The proposal claims to also be suitable for both ambulant disabled people and older adults. Although the criteria are less than the wheelchair user category, these criteria are not met.

Areas of non-compliance for all groups include. This list is not exhaustive.

5.4 The appearance of the dwelling. Though people may have, particular needs in the design of their home, they want as far as possible to appear the same as the other housing. This helps the occupants to feel integrated in the community and in security terms does not advertise that a more vulnerable person lives there. In general housing specifically for older or disabled people should be intermixed housing.

Location and Access to Amenities or Facilities

3.3.3. For the location to be considered “convenient” for people who do not walk easily and who do not have use of public transport or a car, the distance from the dwelling to the facility should be no more than 600 metres.

Layout and Design

Many aspects of the design do not meet recognised criteria within many relevant Housing and Disability Strategies e.g. 14.9 of HFVN provides clear guidance on space and doorways.

(Housing for Varying Needs, 1998)

There is no independent oversight to ensure HFVN is adhered to.

Point 2 of the response states: “a broader, independent evaluation is not required.”

This is refuted as planning and building standards, and regulatory regimes do not relate to Social Policy and the public have no real means to object on behalf of future tenants of the proposed development. You cannot object on grounds of: social inclusion, disability rights, proximity of amenities or diminishing of persons and the space they are afforded.

Essentially only material planning considerations are given merit during planning. E.g. conversions can overlook each other with no consideration of privacy or light for future tenants. This shows the limitations of planning, meeting building standards, but wholly unacceptable in real terms.

The final paragraph of the government’s response detailing the garages must also be refuted.

As an ex-Roxburgh and Berwickshire Citizen’s Advice Bureau, Housing Specialist, this is an issue of social importance and garage tenants losing leases is secondary.

A complaint to Scottish Public Services Ombudsman, pertaining to South of Scotland Enterprise (SoSE) funding is due for consideration,

Representations of potential breaches of the Equality Act 2010 in progression of feasibility study, pilot and planning application are currently being formulated as are possible Representations to SBC and its adherence to Equalities legislation.

I thank you and would appreciate your continued investigation.