

**LABSS INFORMATION PAPER INFOP16 - 2016 Version 10 as Amended – 5 May 2020****Building (Scotland) Regulations 2004**  
Section 3 – Mandatory Standards 3.11 and 3.12

Applicable to Domestic Buildings only in relation to  
Section 3: Environment  
Clauses 3.11.1 and 3.11.2: Apartment/Enhanced Apartment  
and Clause 3.12.3: Accessible Sanitary Accommodation

**BACKGROUND**

Members will be aware that a LABSS TECHNICAL Policy Note T02/2012 was issued in November 2012 giving an interpretation on what constituted a “future space for a shower”. This note was subsequently withdrawn following comment from the Building Standards Division of the Scottish Government that they intended carrying out further research into the topic.

**CURRENT STAS POSITION**

A recent STAS submission by a national housebuilder has highlighted the current ambiguity which exists over the interpretation on what constitutes a “future shower space”. This ambiguity arises from the withdrawal of the LABSS Note and from various discussions within technical and procedural groups between LABSS and the BSD.

Many of the major housebuilders who have sought STAS approval have existing approvals in place which follow the original LABSS Guidance. However, despite a recent STAS submission by a national housebuilder reflecting these previous approvals that interpretation has been challenged by the BSD and some verifiers. There is clearly an imbalance between what would have been accepted in the past and what expectations are now.

**LABSS AIMS ON THIS ISSUE**

LABSS recognise that a greater emphasis is now being placed on minimising future work content should the need for a shower be required by a house occupier in the future. However, LABSS also takes cognisance of the recent history of approvals and understandings between verifiers and developers resulting in uniform compliance decisions to allow approvals to be expedited and blockages minimised or eliminated. Consequently, LABSS firmly believes that the resolution of this issue must have regard to the wider housebuilding industry practice in recent years and if changes in standards, through a different understanding of the guidance, is to be implemented then it must be done on a step by step basis.

**DECISION**

LABSS would propose that;

- 1) While it is recognised that deliberations are still ongoing within Government on reviewing design limitations for future shower areas, LABSS remain of the view that a phased introduction of this “tighter guidance on compliance” would benefit from close working with the BSD and to this end LABSS agreed, to sit on any joint working group convened by the Scottish Government to review this issue to ultimately provide clear guidance to allow verifiers and developers to move forward with confidence.

**A 3-year period of grace was agreed before enforcing any new provisions and it is proposed such period of grace be extended for a further year to allow the working group to reach a conclusion on this topic.**

This would also allow LABSS to inform their STAS Certificate holders and the housing industry of the change of emphasis.

- 2) During this development programme looking at new guidance, developers would be required to gear up for these changes through their ongoing upgrades/replacement programme of designs of their existing stock. STAS submissions for upgrades to existing approvals should be carefully considered against this background of change – where improvements can be agreed this should be done.
- 3) However, during this period of grace a moratorium on the introduction of more rigorous guidance should apply to allow this LABSS Information Paper INFOP16 – 2016 Version 10 – 22 February 2017 to be used in determining:
  - all new applications for building warrants, and
  - all new STAS submissions, and
  - existing STAS Approvals as they come up for renewal, for example to meet current building standards.
- 4) The document under Annex A should be adopted to enhance the transparency of proposals in any cases for a future shower room. If an apartment or other space is being used to form the shower, the justification must confirm that the space that is not needed to comply with the standards and the technical guidance and that the loss of that space (to the shower) will not impact on how the occupants use the overall dwelling and that part of the room/corridor within the dwelling.

In proposing this phased period of change, LABSS emphasises their support of the aims of the Technical Handbook guidance to extend standards to address 'liveability' and the needs of occupants and supports the Scottish Government's aim of promoting a more inclusive built environment that will better address the changing needs of occupants over time. It is recognised this approach to the design of dwellings ensures that Scotland's housing stock can respond to the needs of our population, now and in the future.

However, in this period of recovery within the housing field, LABSS believes that every effort should be made to allow existing design proposals to prevail with the proviso that, wherever possible upgrades will be achieved.

## DESIGN CRITERIA

ALL the guidance on accessible sanitary accommodation should build on the current Technical Handbook references under Guidance Clause 3.12.3 and Figure 3.31, including the footnotes, to meet activity space floor areas and heights and manoeuvring spaces within the future shower area and associated sanitary facilities. It is important to stress that the 'space accommodating accessible sanitary facilities' is the nucleus for forming the 'future shower', or in the case of Option 2, the space of a small store is the nucleus of the future shower. This nucleus can be extended by a small area into another part of the dwelling but by only a small amount (say) approximately 1m<sup>2</sup> and only where there is a generous/surplus space that considers issues, such as not adversely affecting the occupancy of the house or furthermore a fundamental aspect, for example, not making the front entrance door obsolete. When considering the case for compliance, the future provision should allow for:

- a) a location to take account of the activity and maneuverability spaces required within an apartment in compliance with Standard 3.11; this may mean the removal of non-loadbearing partitions;
- b) walls adjacent to any sanitary facility, either existing or provided to accommodate the future shower space, should be of robust construction which will permit secure fixing of grab rails or other aids in the prescribed zones noted in figure 3.32 (all indicated sizes are minimum dimensions);
- c) a drainage connection, positioned to allow installation of either a floor shower or raised shower tray, sealed and terminated either immediately beneath floor level under a removable access panel or at floor level in a visible position. The structure and insulation of the floor in the area identified for a future floor shower should allow for the depth of an inset tray installation (all floors) and a 'laid to fall' installation (solid floors only);

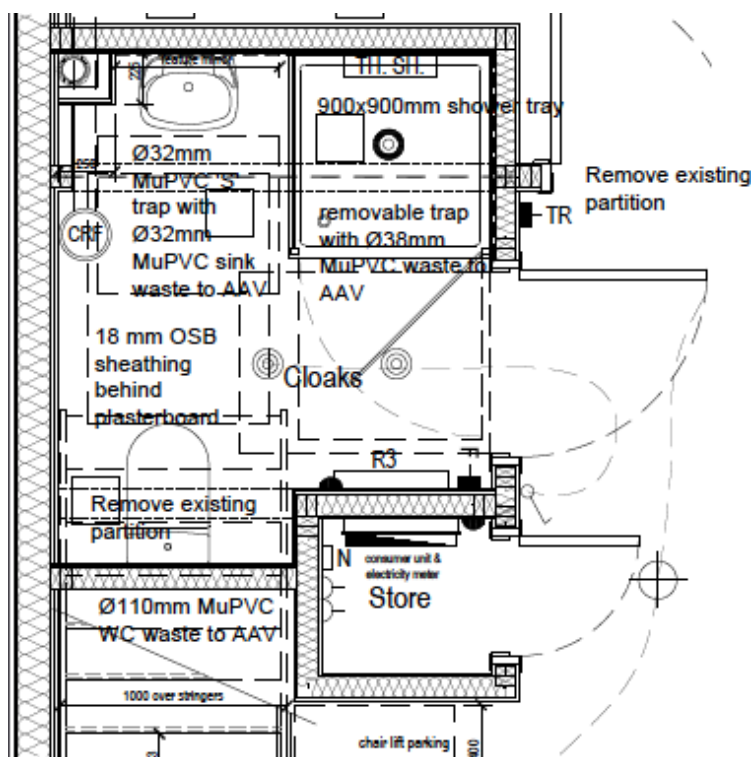
Where possible, the need to reposition or alter existing services i.e. radiators/wiring/sockets should be eliminated when putting together the original design. For example, you may want to consider seeking confirmation that issues such as:

- i. the provision of water supply pipes, capped as necessary, and located in a position to suit the future installation of a shower; a duct to the external air, if not already provided, to allow for later installation of mechanical ventilation;
- ii. the location and specification of electrical fixtures to meet Standard 4.6 sufficient to service any future shower fitting.

It is understood that final wall locations will not be built initially but in all other respects the “future shower space” should include specifications and works to limit the need for future work by the house occupier.

However, it is important that the designer takes due cognisance of the effect any encroachment by a future shower space has on the usability of the area left after that being taken for the shower space.

**OPTION 1: CRITERIA FOR ACTIVITY SPACES FOR FUTURE SHOWER WHEN IN A SPACE INCORPORATING ACCESSIBLE SANITARY FACILITIES CONTAINING A SHOWER**



**Accessible Shower Room Layout**

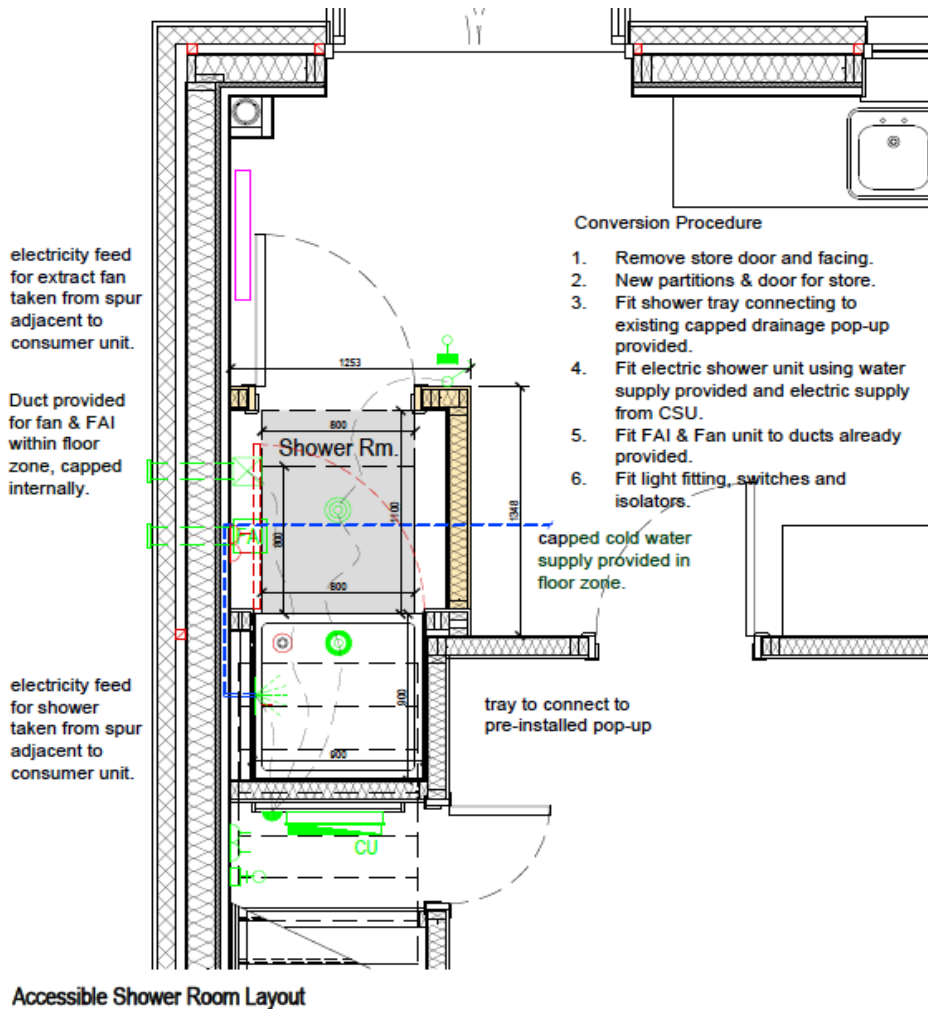
This example shows a future shower formed within an enclosure incorporating existing sanitary fittings.

Works include:

1. Removing existing partitions to accommodate additional space for shower fitting; (if partition to be removed is loadbearing then this original position should include structural goalposts to allow removable infill panel in the future);
2. Erection of new robust partitions;
3. Relocation of w.h.b. and w.c. fittings and fitting new shower tray;
4. Consequential alterations to water supply pipes, electrics and heating to previously provided fixtures and supply services;
5. Ventilation arrangements may need augmented in previously provided ducts.

**OPTION 2: CRITERIA FOR ACTIVITY SPACES FOR ACTIVITY SPACES FOR A FUTURE ACCESSIBLE SHOWER SPACE WHICH IS NOT INCORPORATED WITH OTHER SANITARY FACILITIES**

As noted above, it is important that the designer takes due cognisance of the effect any encroachment by a future shower space has on the usability of the area left after that being taken for the shower space.



This example shows a future shower to be formed when the occupier needs determine that such a facility is needed. Works include:

1. Erection of new robust partitions - (existing adjacent walls previously erected to meet robust walls criteria);
2. Fitting of new shower tray to previously provided drains;
3. Consequential alterations to water supply pipes, electrics and heating; by minor alteration to previously provided fixtures and supply services;
4. Ventilation arrangements provided by extract fan in previously provided ducts.

**MAKING THE CASE FOR A FUTURE SHOWER ARRANGEMENT  
Annex A Template**

House Ref:	Where appropriate indicate all that apply			Justification or comment
<b>Where will the formation of the future shower take place? Complete either (a) or (b) below.</b>	Storage used to form shower space	Apartment used to form shower space	Other space used to form shower space	If an apartment or other space is being used to form the shower, justify the impact on the rest of the property. The justification must confirm that the space that is not needed to comply with the standards and the technical guidance and that the loss of that space (to the shower) will not impact on how the occupants use the overall dwelling and that part of the room/corridor within the dwelling.
<b>(a) Totally separate from the accessible toilet</b>				
<b>(b) Forming a part of the accessible toilet</b>				
<b>Do any structural alterations need to take place to form the future shower?</b>	Wall	Floor	Other	Indicate steps taken to mitigate structural work include formation of enclosing walls as appropriate
<b>Will any sanitary appliances be repositioned to form shower?</b>	WC	WHB	Other	Explain how the drainage arrangements facilitate the easy repositioning of the sanitary appliances
<b>Will future shower (when formed) and other appliances meet dimensions and activity spaces in Clause 3.12.3?</b>	WC	WHB	Shower	Comments
<b>Drain for future shower?</b>	Readily accessible below floor level		At floor level and visible	If neither, specify arrangement
<b>Tray for future shower?</b>	Inset tray		Laid to fall (solid floor)	Comments
<b>Headroom is at least 1.8 metres over future shower and activity space?</b>	WC activity space	WHB activity space	Shower <u>and</u> activity space	If less than 1.8 metres, specify arrangement
<b>Any changes needed to ventilation arrangements?</b>	Yes		No	Comments
<b>Any changes needed to water supply/heating arrangements?</b>	Yes		No	Comments
<b>Any changes needed to electrical/heating arrangements?</b>	Yes		No	Comments
<b>Any other options to justify the case?</b>	Capped water supplies	Electrical fixtures	Repositioning of existing services	

**MAKING THE CASE FOR A FUTURE SHOWER ARRANGEMENT**  
**Annex A Example – Option 1: Incorporated with Other Sanitary Facilities**

House Ref:	Where appropriate indicate all that apply			Justification or comment
<b>Where will the formation of the future shower take place? Complete either (a) or (b) below.</b>	Storage used to form shower space	Apartment used to form shower space	Other space used to form shower space	If an apartment or other space is being used to form the shower, justify the impact on the rest of the property. The justification must confirm that the space that is not needed to comply with the standards and the technical guidance and that the loss of that space (to the shower) will not impact on how the occupants use the overall dwelling and that part of the room/corridor within the dwelling.
<b>(a) Totally separate from the accessible toilet</b>				<b>When formed the shower room will encroach partly into the lounge/dining room. However, this house has 2 bedrooms which realistically could only be occupied by a total of 4 persons. The current dimensions of this apartment are 3.6+m x 5.2+m (floor area =18.7+m<sup>2</sup>) and to facilitate the future shower would mean a loss of 1.2m<sup>2</sup>. A minimum dimension of 3m in any direction would remain for this enhanced apartment, with an overall floor area of 17.5+m<sup>2</sup> being retained, giving 5.5+m<sup>2</sup> over the minimum expected of such a room. A void space from below the stairs will also be incorporated into the shower room.</b>
<b>(b) Forming a part of the accessible toilet</b>	<b>YES</b>	<b>NO</b>	<b>YES</b>	
<b>Do any structural alterations need to take place to form the future shower?</b>	Wall	Floor	Other	Indicate steps taken to mitigate structural work include formation of enclosing walls as appropriate
	<b>YES</b>	<b>NO</b>	<b>NO</b>	<b>Existing walls have knock out panels incorporated – new partitions non-loadbearing</b>
<b>Will any sanitary appliances be repositioned to form shower?</b>	WC	WHB	Other	Explain how the drainage arrangements facilitate the easy repositioning of the sanitary appliances
	<b>YES</b>	<b>YES</b>	<b>NO</b>	<b>Fittings relocated to accommodate shower space and to meet activity space criteria</b>
<b>Will future shower (when formed) and other appliances meet dimensions and activity spaces in Clause 3.12.3?</b>	WC	WHB	Shower	Comments
	<b>YES</b>	<b>YES</b>	<b>YES</b>	<b>All in compliance with Clause 3.12.13</b>
<b>Drain for future shower?</b>	Readily accessible below floor level		At floor level and visible	If neither, specify arrangement
	<b>YES</b>			<b>Drain existing capped off below floor ready to take shower tray</b>
<b>Tray for future shower?</b>	Inset tray		Laid to fall (solid floor)	Comments
	<b>YES</b>			
<b>Headroom is at least 1.8 metres over future shower and activity space?</b>	WC activity space	WHB activity space	Shower and activity space	If less than 1.8 metres, specify arrangement
	<b>YES</b>	<b>YES</b>	<b>YES</b>	
<b>Any changes needed to ventilation arrangements?</b>				Comments <b>Existing extract fan already in place</b>
<b>Any changes needed to water supply/heating arrangements?</b>				Comments <b>Electrically powered shower heater. Room heater remains.</b>
<b>Any changes needed to electrical/heating arrangements?</b>	<b>Yes</b>			Comments <b>Minor alterations to existing hot water piping and shower heater system to accommodate new electrically powered shower</b>
<b>Any other options to justify the case?</b>	Capped water supplies	Electrical fixtures	Repositioning of existing services	<b>Minor re-routing in existing accessible toilet to facilitate new shower</b>



**MAKING THE CASE FOR A FUTURE SHOWER ARRANGEMENT**  
Annex A Example – Option 2 Not Incorporated with Other Sanitary Facilities

House Ref:	Where appropriate indicate all that apply			Justification or comment
<b>Where will the formation of the future shower take place? Complete either (a) or (b) below.</b>	Storage used to form shower space	Apartment used to form shower space	Other space used to form shower space	If an apartment or other space is being used to form the shower, justify the impact on the rest of the property. The justification must confirm that the space that is not needed to comply with the standards and the technical guidance and that the loss of that space (to the shower) will not impact on how the occupants use the overall dwelling and that part of the room/corridor within the dwelling.
<b>(a) Totally separate from the accessible toilet</b>	YES	NO	YES	The design of the dwelling includes a large lounge and dining kitchen. In incorporating space for both casual dining in the dining kitchen and formal dining in the large lounge, minimum maneuverability needs specified in the guidance to Mandatory Standard 3.11.2 are not compromised in either room. In this way, the ability to be easily convert the under-stair cupboard and part of the dining kitchen for a future shower means that casual dining in the dining kitchen and formal dining in the lounge can still be achieved. House occupied by 4 people.
<b>(b) Forming a part of the accessible toilet</b>				
<b>Do any structural alterations need to take place to form the future shower?</b>	Wall	Floor	Other	Indicate steps taken to mitigate structural work include formation of enclosing walls as appropriate
	NO	NO	NO	New partitions non-loadbearing
<b>Will any sanitary appliances be repositioned to form shower?</b>	WC	WHB	Other	Explain how the drainage arrangements facilitate the easy repositioning of the sanitary appliances
	NO	NO	NO	
<b>Will future shower (when formed) and other appliances meet dimensions and activity spaces in Clause 3.12.3?</b>	WC	WHB	Shower	Comments
			YES	Shower only in its own compartment designed to meet Clause 3.12.13
<b>Drain for future shower?</b>	Readily accessible below floor level		At floor level and visible	If neither, specify arrangement
	YES			Drain existing capped off below floor ready to take shower tray
<b>Tray for future shower?</b>	Inset tray		Laid to fall (solid floor)	Comments
	YES			
<b>Headroom is at least 1.8 metres over future shower and activity space?</b>	WC activity space	WHB activity space	Shower and activity space	If less than 1.8 metres, specify arrangement
			YES	Shower only in its own compartment designed to meet Clause 3.12.13
<b>Any changes needed to ventilation arrangements?</b>	Yes			Comments New extract fan installed in already fitted extract duct.
<b>Any changes needed to water supply/heating arrangements?</b>	Yes			Comments Electrically powered shower heater.
<b>Any changes needed to electrical/heating arrangements?</b>	Yes			Comments New power shower electrical fitting from existing immediately adjacent power outlets.
<b>Any other options to justify the case?</b>	Capped water supplies	Electrical fixtures	Repositioning of existing services	Water supply pipes already installed and capped ready for new shower; Electrical fittings needed from immediately adjacent CPU in under stair cupboard; slight changes to radiator position to accommodate extended shower room.