

Response ID ANON-TMEU-379H-6

Submitted to Enhancing the accessibility, adaptability and usability of Scotland's homes: consultation

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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 reply is compiled from SCSN's organisational knowledge – through an experienced staff team and a presentation on the consultation at the recent

Home Safety Scotland Forum. At the Scottish Community Safety Network we believe that the guide needed to be updated to reflect the changes in population especially with an ageing population and the likely impact this will have in terms of increase in dementia sufferers and other cognitive impairment illnesses.

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 some but not all of the proposals

Please explain the reasons for your answer.:

We agree with some of the proposals however believe that another key safety proposal to prevent slips, trips and falls in the homes has been missed with

a specific requirement for BS5395-1 for safer stairs to be included within the proposals. RoSPA research indicates that installing stairways to meet this

specific standard reduces falls by up to 60%. By installing these stairways there is likely to be a cost saving with a reduction in hospital treatment compared

with the cost of installing these stairways into new build properties.

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 all of the proposal

Please explain the reasons for your answer.:

Scotland's new homes need to be accessible for all to use. A ramped entrance will provide for this and will hopefully prevent falls for those who require mobility aids.

Another element to consider is the rise in the number of electric vehicles currently on the road and to ensure that the driveway has an accessible charging port suitable for those who require the use of wheelchairs.

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.:

We support this approach to increase the width and dimensions of the communal door. This would be to enable people with mobility aids to enter the

communal close. Horizon scanning, there may be some questions with regards to ownership of the communal door if the property is of mixed tenure.

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 all of the proposals

Please explain the reasons for your answer.:

The proposals are supported as the Building Standards supersede the previous guides

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.:

The proposal is supported as it provides the dimension for mobility aids to be used.

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.:

Yes we agree with the proposals for an automatic door opening for the communal door. We would propose that this is the first option for communal

doors with manual doors the secondary option. We also support the proposal for an adjustable timed opening for the door. Clarity would be needed for

the homeowner on who has responsibility for the setting of the time.

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 agree with the proposal

Please explain the reasons for your answer.:

As per previous answers the door should be open as wide as possible to allow for wheelchairs or people assisting mobility aid users sufficient space to

move safely around.

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.:

We are pleased that the proposals include considerations for dementia sufferers especially with the colour coding. We would ask that any additional

proposals for adaptable homes should be evidenced led especially with the research at Stirling University.

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?

I agree with some but not all of the proposals

Please explain the reasons for your answer.:

We agree with the proposals however it is our belief that the BS5395-1 safer stairs should also be included. As previously reported, RoSPA highlighted

that ensuring the stairs meet this requirement it will reduce falls by up to 60%. As the proposals are specifically designed for inclusive living, we believe

that the improvement in safety designs for stairs will allow people to reside in their own homes.

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.:

We support this proposal as it now required new build properties to meet this clause and that it will be considered the standard dimensions. With this

being the standard it would also be accepted as the "minimum" dimension.

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 agree with this proposal as the stigmatization work undertaken by the Inclusive Living Alliance highlights the occupants could be stigmatized because

of properties that have been adapted. By conferring with the resident, it should reduce the risk of stigmatisation.

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

I agree with some but not all of the proposal

Please explain the reasons for your answer.:

We agree with the proposals on the provision that a standard test has been completed and that this is sufficient space for a wheelchair user to move

within this area.

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

I agree with some but not all of the proposal

Please explain the reasons for your answer.:

We fully support the proposals to increase the turning circle for a wheelchair user to provide them with dignity in their own homes. We do question however the validity of overall costs for the increase in area for the house.

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?

I agree with some but not all of the proposals

Please explain the reasons for your answer.:

With the current housing crisis we do not believe that the 2 metre mat at the front of the property should be restricted to the houses of wheelchair users

alone. We are aware of the delay of building adaptations or the limited housing stock for suitable new build properties for wheelchair users. We believe

that a mat installed to allow for wheelchair access inside the property will assist with the dual usage of a property for those using mobility aids and those

who do not need them at the time of purchasing the property.

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 agree with all of the proposal

Please explain the reasons for your answer.:

17 How do you feel about the proposal:

I agree with some but not all of the proposal

Please explain the reasons for your answer.:

whilst we understand the need for mobility aid users to access the upper floor of a property and thus widening the stock of suitable accommodation for

mobility aid users, consideration should also be given for stair lifts as an alternative to a lift which may impact on the overall aesthetic appeal for the property.

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:

Not Answered

Please explain the reasons for your answer.:

we support this proposal

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?

I agree with all of the proposals

Please explain the reasons for your answer.:

we are especially pleased with the inclusion of tapered treads to be avoided to prevent falls within a property

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 agree with some but not all of the proposal

Please explain the reasons for your answer.:

We support the proposal for the "turning circle" however note that the consultation has been with "health professionals" and not the likely target group

of "service users". Clarity is needed with service users to confirm that this is appropriate for service users.

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?

I agree with all of the proposals

Please explain the reasons for your answer.:

we agree with these proposals and are pleased to note the comments about bedroom being large enough to have access on both sides of the bed

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?

I neither agree nor disagree with the proposals

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.:

we would also like consideration for dementia sufferers and the research conducted at Stirling University to allow people suffering with this disease to

remain within their own home.

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 agree with the proposal

Please explain the reasons for your answer.:

We note that this is health professionals who recommended this size however believe that the service user would be best to advise on the appropriate size needed.

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?

I neither agree nor disagree with the proposals

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 agree with all of the proposal

Please explain the reasons for your answer.:

this should be standard for all future homes.

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

I agree with all of the proposal

Please explain the reasons for your answer.:

we fully support this proposal however would question that there would be "zero cost" for this proposal.

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

I agree with all of the proposal

Please explain the reasons for your answer.:

we fully support this proposal.

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

I agree with all of the proposal

Please explain the reasons for your answer.:

we also note the consideration for people who suffer from dementia.

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 all of the proposals

Please explain the reasons for your answer.:

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 all of the proposals

Please explain the reasons for your answer.:

We note in the proposal and the papers of the recognition for dementia sufferers and the move away from "glare" finishes. We also support any recommendation that is aesthetic and reduces the risk of falls.

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.:

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.:

we support this proposal especially the consideration given to easy openings of windows and easy access to windows.

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 some but not all of the proposals

Please explain the reasons for your answer.:

We agree with the proposals and trust that it will also meet the environment sustainability policies.

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:

I neither agree nor disagree with the proposal

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?

I neither agree nor disagree with the proposals

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 all of the proposals

Please explain the reasons for your answer.:

we fully support this proposal to support people to be able to enjoy their homes in a suitable space out with their property.

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.:

We fully support this proposal especially with regards to a review of the adaptations process and the use of technology for people with dementia.

We

would also recommend links with Stirling University especially with regards to their innovative research into dementia and keeping people who suffer this

illness in their own home.

There is clearly a need to meet the housing crisis we will face over the next 10 years by improving the adaptations processes.

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?

Don't know/ no opinion

Please explain the reasons for your answer.:

With regards to the design changes we are neutral with this statement. We do note however that a lot of the delegates promoted within the consultation

are health professionals however there appears to be limited engagement / consultation with "service users" or those who this policy is intended to assist. If this is the case, we hope that there is a weighting grade for those who respond to this consultation and are directly affected by the proposals are

seen as a higher weight contrasted with the rest of the responses.

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 documents needed to be open to review this consultation numbers at 4. The irony for this point is that the title of the consultation is "accessibility"

when those who are affected by the proposed changes would describe the process as "inaccessible".

We cannot dispute that the consultation is thorough with every recommendation reviewed however there is a belief that this is targeted more at the

house building sector rather than the group who will be residing within the property.

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 neither agree nor disagree with 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 all of the criteria would be appropriate to apply to all new housing across all tenures

Please explain the reasons for your answer.:

Scotland has an insufficient stock of properties to meet our ageing population needs. With ourselves living longer in Scotland we are likely to suffer more physical needs (as reported by Public Health Scotland). We cannot rely alone on social housing stock or local council stock to meet the gap currently experienced. There is a clear need to improve the volume of suitable properties to meet future demand.

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.:

in terms of the design criteria we are silent on this point however we would like to highlight the opportunity to review the impact that the proposals have had

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?

Yes

Please explain the reasons for your answer.:

We expect the stairs for all new build properties to comply with BS 5395-1 safer stairs. This would further reduce the incidence of falls within the property.

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?

Not Answered

Please explain the reasons for your answer.:

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

No

Please explain the reasons for your answer.:

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?

No

Please explain the reasons for your answer.:

We believe that the main points have been covered especially the delay for adaptations being installed in a property (see MND Scotland No Time To Lose

2022 strategy).

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?

No

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.:

we note the 70% commitment by 2032 for the proposed 110,000 new homes built being social houses whilst the proposals are reflecting the future proof

of properties,

the financial costs to a tenant within the most deprived areas may be significant.

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.:

By making these proposals, we believe that this will have a positive impact on the UNCRC especially living within a property that is safe.

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 believe in some areas the costs to add the enhancements have been under estimated. In particular the costs for the lifts to be installed and also the

concrete floor on the ground floor to accommodate a downstairs wet room.

About you

53 What is your name?

Name:

kevin chase

54 What is your email address?

Email:

kevin.chase@scsn.org.uk

55 Are you responding as an individual or an organisation?

Organisation

56 What is your organisation?

Organisation:

Home Safety Scotland

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

Publish response only (without 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

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.:

it is very in depth and the road shows meant the proposed date for the consultation had to be moved back.

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

Very satisfied

Please enter comments here.: