

comments

The Access Association (treasurer@accessassociation.co.uk)

Page: [Policy GG1 Building strong and inclusive communities](#)

Section: [N/A](#)

Policy GG1 Building Strong and Inclusive Communities

Point A 'seek to ensure that London continues to generate a wide range of economic and other opportunities, and that everyone is able to benefit from these to ensure that London is a fairer and more equal City'

Do we really only want 'more equal'? Surely we can aim higher? How does this meet the Mayors duties under the Public Sector Equality Duty? Shouldn't it say a 'London that is fully inclusive and gives everyone equal opportunity'.

Point C Ensure that streets and public spaces are planned for people to move around and spend more time in comfort and safety, creating places where everyone is welcome, which foster a sense of belonging and community ownership, and where communities can develop and flourish.

London needs consistent streets and public spaces. Users shouldn't be able to see borough boundaries in London.

Point F Support the creation of a London where all Londoner, including older people, disabled people and people with young children can move around with ease and enjoy the opportunities the City provides, creating a welcoming environment that everyone can use confidently, independently and with choice and dignity, avoiding separation or segregation.

Welcome this point.

Page: [Policy GG3 Creating a healthy city](#)

Section: [N/A](#)

Can we get anything in about 'end of journey' facilities that encourage sustainable travel e.g. accessible showers and cycle parking? Can we get anything added about inclusive fitness initiative in gyms and sports centres and about pool pods in swimming pools to give independence. The chance to increase the healthy options available to disabled people seems to be being missed here.

Page: [Policy GG4 Delivering the homes Londoners need](#)

Section: [N/A](#)

The housing requirements seem spread out rather than altogether. There is no mention of M4(2) or M4(3) in this section you have to go to D5 Accessible Housing but that is separate from the other Housing information and Policies. There is no cross referencing going on. Can we get anything in to ensure wheelchair accessible homes are advertised to those that need them first.

Page: [Policy GG6 Increasing efficiency and resilience](#)

Section: [N/A](#)

It would be good to see a line on accessibility versus security. Can we get anything in on access versus heat loss to stop revolving door argument? In creating resilience should we not be considering the needs of an ageing population and how we encourage and allow people to live independently for longer?

Page: [Policy SD4 The Central Activities Zone \(CAZ\)](#)

Section: [N/A](#)

The CAZ – especially parts of the West End - is still not accessible to disabled people. For example there are still many streets where there are no dropped kerbs or accessible crossings creating inconsistent accessible routes. An additional policy that requires the delivery of a barrier – free and inclusive CAZ should be added to SD4 using the same wording as in SD6 H Town Centres.

Page: [Policy SD6 Town centres](#)

Section: [N/A](#)

The wording in H should be amended from ‘may include Shopmobility Schemes....’ to ‘should include Shopmobility Schemes....’

Shopmobility schemes can provide essential support for disabled and older people enabling them to take full advantage of retail and other services not otherwise available to them. Shopmobility schemes should be supported to provide not just wheelchairs and scooters but volunteers who can act as guides for blind and partially sighted people, people living with dementia and people with sensory/neurological processing difficulties who benefit from assistance while shopping.

Page: [Policy SD7 Town centre network](#)

Section: [N/A](#)

Add H to policy: H ‘Boroughs should undertake a comprehensive accessibility audit of their international and metropolitan town centres and set a timescale for access improvements to be undertaken.’. Despite improvements in recent years not all of London’s International and Metropolitan town centres are easily accessible to disabled people - improvements are still needed especially in terms of the public realm. To ensure that improvements are undertaken in line with GG1, the overarching policy to Build Strong and Inclusive Communities, a policy should be added to SD7 that requires boroughs to undertake a comprehensive accessibility audit of their international and metropolitan town centres and set a timescale for access improvements to be undertaken. It is unacceptable in the 21st Century for our International Centres to still be lacking in such basic provision as dropped kerbs. Use of the Town Centre Health Check process does not seem to have been the catalyst for effective change so a tougher policy should now be included in the plan.

Page: [Chapter 3 Design](#)

Section: [N/A](#)

Whilst we are supportive of the Policy D3, we are concerned that previous versions of this Policy (7.2 of the current plan and 4B.5 of the 2004 Plan) have not been delivered in a consistent manner across the boroughs. Further less and less boroughs have access advisors / experts within their planning teams and as such LPA are not able to enforce in an appropriate way. The current SPG serves as a clear guide on the process of delivering an inclusive environment as well as the need to engage access experts where appropriate and consult with local accessibility groups. Under the new Policy D11 Fire Safety we note that the Policy requires an Independent Fire Statement produced by a third party suitably qualified assessor as a reflection of the complexity of the matter, Policy D11 is similar to D3 in that it expects the highest standards of fire safety where D3 expects the highest standards of inclusive design. D3 also requires an Inclusive Design Statement. For consistency we recommend that D3 also requires the Inclusive Design Statement to be produced by a suitably qualified assessor.

Page: [Policy D1 London's form and characteristics](#)

Section: [N/A](#)

It would be helpful to include a paragraph in the supporting text to explain what is meant by an inclusive environment.

Page: [Policy D2 Delivering good design](#)

Section: [N/A](#)

Policy D2 Delivering Good Design

A Initial Evaluation: should add 12) an assessment of how accessible and inclusive an area is and make reference to this in the supporting text.

Welcome F but should add inclusive design officers so that it reads: 'Design Review should be in addition to the borough's planning, urban and inclusive design officers' assessment .

Paragraph 3.2.6 Mayor's Design Advocates

Does the Mayor's Design Advocates include a specialist Inclusive Environment Expert? If not it should!

Policy D3 Inclusive Design

Whilst this policy is very welcome and will help to achieve Policy GG1; consideration needs to be given to the additional "steps" that the Equality Act 2010 requires Local Planning Authorities to take, or should require developers to take, to remove barriers in existing public environments. This might entail a whole range of interventions ranging from shopfront doorsteps at the interface of external and internal realms, to features like unguarded trip hazards, and absent kerbs and kerb crossings in public realm areas around the site of a development proposal

Given the added and welcome attention in the plan to means of escape, I suggest that the word 'exited' is added to A1) so that it reads: 'can be entered, exited and used safely, easily and with dignity by all.

For the London Plan to deliver physical development that addresses shortcomings in public realm or other external environments that provide access to new building projects, London Plan policy ought to require access updating and barrier removal in the streets and spaces around new buildings and in the approaches to new, altered or extended buildings.

BS 8300-1:2018 Fig. 1 recommends that to identify disabling barriers inclusive design strategies for the external built environment should incorporate end-user feedback, tailored audits and also customer surveys to identify the barriers that development proposals should remove.

A2 could be altered to read:

A2a "are convenient and welcoming with disabling barriers removed, no new disabling barriers introduced, and which provide independent access without additional undue effort, separation or special treatment"

B encouragement of access statements is most welcome. Could the Mayor provide SPG on what information an access statement should contain. These statement should be written be suitably qualified and / or experienced people to ensure that they are of suitable quality.

Amend explanation in the first sentence of 3.2.1 to read:

"Despite recent progress in building a more accessible city, too many Londoners and visitors to London still experience barriers to living independent and dignified lives, due to the way the built environment has been designed and constructed or is managed, **or in the way that it has not yet been updated to remove the barriers that disable people.**"

Paragraph 3.3.2

The last sentence in paragraph 3.3.2 has been repeated twice.

No mention is made of incorporating dropping off zones in public spaces as many disabled people are unable to use public transport, walking and cycling routes. Consideration should also be given to accommodating the use of electric mobility scooters in the design of public spaces as increasing numbers of older and disabled people use them as a way of maintaining their independence. Questions like: Can they be charged in public in the same way electric cars can be? Should scooters only be used on the pavement or can they use cycle lanes?

Paragraph 3.3.3

Should ensure that any security features do not make access for all difficult or impossible for wheelchair and scooter users and for those with visual impairments.

Amend explanation in the last sentence of 3.3.4 to read:

"The internal environment of developments should meet the highest standards in terms of access and inclusion, creating buildings which meet, or are updated to meet, the needs of the existing and future population."

Paragraph 3.3.5

The proposal to have evacuation lifts is an important improvement. However, other simple measures should also be reviewed like step-free exits to all buildings and the use of emergency lighting etc. All too often, it is the last few metres that are the barrier to access out of a building in an emergency.

Paragraph 3.3.7

The request for an “Inclusive Design Statement” as part of the design and access statement is a major step forward and would prevent the use of the phrase “the design will comply with the DDA/EA” as a response to details on disabled access to the scheme. They are only of any value however if they are written by a suitably qualified or experienced person and this needs to be added in a similar vein to fire assessments.

Table 3.1 Minimum Space Standards for new dwellings

There should be a note to set out that in meeting these minimum space standards it is not guaranteed that M4(2) and M4(3) requirements can be met. Pleasing that these space standards will apply to new building, change of use and conversions.

The Gross Internal Area (GIA) calculation includes partitions, structural elements, cupboards, ducts, flights of stairs and voids above stairs; these are not ‘usable spaces’ and can impact whether a space is accessible or not.

Policy D4 Housing quality and standards

There is no mention of accessible housing in this section or even a cross reference to D5.

F “The design of development should provide sufficient daylight and sunlight to new housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space”.

This is an important consideration in the design process as researchers correlate the risk of insufficient daylight and sunlight with poorer health; with higher incidences amongst disabled and older people.

Can the Mayor not encourage lifetime homes standards for conversions / changes of use?

3.4.1

Is the term 'minimum space standards' defined as a 'non-negotiable' to prevent designers/ contractors from producing dwellings below these dimensions? Space standards should not be compromised to maximise efficient use of land; as this will impact on sustainability of neighbourhoods.

3.4.2

Where would category 3 and category 4 dwellings be incorporated in new schemes as they would exceed the minimum space standards?

Page: [Policy D4 Housing quality and standards](#)

Section: [Table 3.1](#)

Comment pasted in from comment submitted on D3 Inclusive Design and submitted/ pasted across by Rachel Smalley:

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Page: [Policy D5 Accessible housing](#)

Section: [N/A](#)

Policy D5 Accessible Housing

This policy should apply to conversions and extensions (where feasible). As a minimum it should encourage planners to ask if any will be accessible?

The requirement for accessible car parking is gone from the previous London Plan and this is a backwards step. It should be brought back.

There is no mention of what will happen with the Accessible housing register. Accessible housing is being built but how will disabled people find it. Can accessible market housing be advertised separately to those who need it before it is opened up to the general public?

It is a retrograde step from the previous two London Plans to only apply accessible housing standards to new build housing. Lifetime Home standards and wheelchair accessible housing standards have been applied to all new housing in London since 2004 and there is no reason why this policy should not continue. It is unacceptable to now omit the requirement to provide accessible homes in buildings being converted into housing.

A separate policy should be included on this issue. It should be made clear that it is a planning issue to be addressed by the planning authority. This will help to overcome the difficulty of linking the accessible housing standards to the building regulations.

There is no mention of dog spending areas and exercise areas of assistance animals and with many municipal and local parks not allowing dogs this creates a barrier for disabled people.

3.5.3 “To ensure that all potential residents have choice within a development, the requirement for M4(3) wheelchair user dwellings applies to all tenures. Wheelchair user dwelling should be distributed throughout a development to provide a range of aspects, floor level locations, views and unit sizes”.

These comments provide welcome support to those wishing to supply a variety of dwellings for disabled people on various floors and elevations, instead of applying the one-size fits all approach.

Supporting paragraph 3.5.4

Concerned that this policy on accessible housing is in the design section rather than in the Housing section so it may get lost?

It would be helpful to include in this paragraph a sentence that explains what is not considered to be easily adaptable – i.e. no structural alterations/ moving walls etc only alterations that can be done easily and quickly while the resident remains insitu (see wording in SPG Accessible London).

One way to save on the cost of adaptations and enable many older people to return to their own homes quickly after a hospital admission is to install a walk in shower in every new home instead of a bath but located in an 1800mm long space so that occupiers can choose to easily install a bath if they wish.

Wheelchair accessible and wheelchair adaptable should consider potential locations for charging mobility scooters. Current designs locate these charging points more than 50m away from the dwelling; and do not take into account the fact that some disabled and older people cannot walk more than a few steps, if at all.

Supporting paragraph 3.5.6

It should be made clear that a lift should be an 8 person lift as a minimum.

Relaxation of requirement to provide a lift in a number of circumstances:

“Blocks where the implications of ongoing maintenance costs on the affordability of service charges for residents will be prohibitive.”

This latter category is a cause for concern as it restricts options for many disabled people, at the same time guidance on the application of service charges is limited and can be artificially high. Surely the priority is to ensure that the vast majority of dwellings particularly those in M4 (2) and M4 (3) are accessible regardless of the tenure or service charges?

3.5.7

This conflicts with H2 small sites policy but is definitely the preference.

3.5.8

This is an important improvement on the current system, as it will create a register of sorts; which details how many wheelchair accessible and wheelchair adaptable units will be created on each development and can help in the provision of health and social facilities to support the neighbourhood.

Page: [Policy D6 Optimising housing density](#)

Section: [N/A](#)

Policy D6 Optimising housing density

A “It’s connectivity and accessibility by walking and cycling and existing and planned public transport (including PTAL)”.

No mention is made of provision for other types of vehicles e.g. Hospital Patient Transport, online delivery vehicles or provisions for disabled drivers unable use public transport.

B 2) The ability to support proposed densities through encouraging active travel should be taken into account.

Active travel should include options for disabled and older people; which may include disabled driving routes, drop-off zones, charging points and storage places adjacent to their front doors for electric mobility scooters etc.

3) The phasing of infrastructure parallel to the scheme will ensure that problems for residents accessing the site are minimised even if schemes do become redundant due to lack of continued investment.

3.6.3 “The surrounding infrastructure of all homes is a key element in determining the optimum density of a site. The capacity of existing and future public transport services and the connections they provide, should be taken into consideration”.

These considerations require long term planning, as withdrawal of bus and community bus services can have a detrimental effect on a development as not all residents will be able to participate in walking and cycling options particularly disabled and older people.

3.6.5

More information is required on the definition of the “Healthy Streets Approach”?

3.6.8

The request for Management plans to provide details on the affordability of running costs and service charges by the different types of occupiers. This could add an additional level of complexity and cost. The focus should be on management systems that require minimum maintenance.

Page: [Policy D7 Public realm](#)

Section: [N/A](#)

[Policy D7 Public Realm](#)

B “Maximise the contribution that the public realm makes to encourage active travel and ensure its design discourages travel by car and excessive on-street parking, which can obstruct people’s safe enjoyment of the space. This includes design that reduces the impact of traffic noise and encourages appropriate vehicle speeds.”

Parking provision still needs to be made for disabled and older people who are unable to travel by public transport; it should be done in a way to enable them to also enjoy the public realm.

D “... The priority mode of travel for the area should be identified and catered for as appropriate. Desire lines for people walking and cycling should be a particular focus, including the placement of street crossings”.

When creating desire lines careful consideration should be given to interaction between cyclists and pedestrians particularly disabled and older people who may be unable to react or hear cyclists approaching in shared spaces. It may warrant the use of calming measures to encourage cyclist to reduce speed in areas where there is a greater proportion of pedestrians.

I “To ensure that shade and shelter are provided with appropriate types and amounts of seating to encourage people to spend time in a place, where appropriate.”

These proposals are to be encouraged as they help the reduction of ‘social isolation’ in disabled and older people and maximise the use of the public realm.

L “Ensure that on-street parking is designed so that it is not dominant or continuous, and that there is space for green infrastructure as well as cycle parking in the carriageway. Pedestrian crossings should be regular convenient and accessible”.

Pedestrian crossings should be accessible to all, and unlike zebra crossings which rely on the pedestrian being able to see the motorist. Green infrastructure can be incorporated into on-street parking without significantly reducing the numbers of spaces, as reduction can create more congestion.

Should reference be made here to dropped kerbs and accessible crossings as per paragraph 3.3.2?

Add N ‘Ensure the provision and future maintenance of a choice of seating located at regular intervals along popular routes.’

Should include reference to the location and design of seats – these are essential resting places for many people and the lack of them can prevent some people using places.

No mention of shared space / shared surface and the difficulties faced in using them for a lot of disabled people which is disappointing. It would be good to have a London wide agreement on how it is or is not installed rather than allowing boroughs to randomly install their own versions.

Supporting paragraph 3.7.5

Include reference to audible and tactile information at controlled crossings –audible bleeps seem to have been omitted from many of the new type of pedestrian crossings.

In addition controlled crossings provide greater accessibility for disabled and older people, who are not always able to establish eye contact with the driver.

3.7.7 Legibility and signposting

These aspects should be considered very in the design process to ensure that these aims are met. It is common for it to be designed later in the process; with less opportunities for consultation amongst potential end-users and sometimes when cost savings are required.

Supporting paragraph 3.7.9

Will the Mayor's Public London Charter include how to ensure maintenance and management of accessible facilities for disabled people?

3.7.10

“The lighting of the public realm needs careful consideration to ensure it is appropriate to address safety and security issues, and make night-time activity areas and access routes welcoming and safe, while also minimising light pollution”.

This recommendation is to be encouraged, as some new public realm schemes rely on local developments for ‘borrowed light’. However, this can be problematic if the development is delayed or lighting is inconsistent.

3.7.11

“The provision of free drinking water fountains”

This facility must be fully accessible for disabled and older people to operate independently.

Page: [Policy D8 Tall buildings](#)

Section: [N/A](#)

It is disappointing that there is no guidance on the taller the building the more lifts needed to protect against failure / breakdown.

Welcome the policy on fire safety and the requirement to provide a Fire Safety Statement. This will assist in designers and building owners considering the evacuation needs of disabled people at an early stage in the design and development process. It should be made clear however, in paragraph

The proposals for fire safety have been given a higher profile following recent events. It again raise the ongoing issues around evacuating and protecting disabled and older people.

3.11.4 That any lift used for evacuation should be at least an 8-person wheelchair accessible lift (if not larger). Is to be encouraged as it encourages measures that incorporate safe and independent access through the use of firefighting/evacuation lifts, better refuge spaces and lobbies. Would add, improvements to fire exits to ensure that they are step-free.

Welcome evacuation lifts in all buildings. This is a real stride forward in demonstrating that the lives of disabled people are as important as the lives of non-disabled people.

3.11.5 - would like further information on how this will work.

Page: [Policy D13 Noise](#)

Section: [N/A](#)

Welcome the policies to reduce, manage and mitigate noise. This can be a particular issue for people living with dementia and people with sensory/neurological processing difficulties who can be particularly sensitive to loud, consistent or unexpected noise. It might be helpful to stress this in the supporting paragraphs and make reference to the need for 'Design for the Mind' advice.

Page: [Chapter 4 Housing](#)

Section: [N/A](#)

No mention of dog spending areas for assistance dogs in this section of D5. This is very important for people with assistance dogs. No mention of distance from drop off point to communal entrance, which again is important for many disabled people.

Page: [Policy H2 Small sites](#)

Section: [N/A](#)

H2 Small sites

G - Should still encourage M4(2) and M4(3). There is an ability for applicants to write in their DAS why they won't be able to provide M4(2) M4(3) and that is sufficient. This will just increase further the problem some disabled people have finding an accessible residence. Each unit should be considered separately. There is no reason why ground floor units on a small site that cannot provide a lift to upper floors could not be M4(2) or M4(3). This will have a detrimental effect on housing for disabled people.

There is often no reason why the ground floor unit in a small block cannot be made fully wheelchair accessible and this opportunity should not be missed particularly in outer London boroughs where small sites are more common. It is also often appropriate to design the upper floor units to comply with many of the M4 (2) standards even where there is no lift – for example it may be possible for someone to use a flight of stairs but need a walk in shower rather than a bath. The policy should be worded in such a way that developers are asked to consider the best option first, rather than only requiring the minimum standard.

This creates dwellings that are not step-free and there is no requirement to provide a lift either. In some areas this will mean that disabled and older people will not have access to these new developments; particularly as the government is encouraging small site development.

Over the next ten years that is 10% of 245,730 housing target (table 4.2) not M4(2) or M4(3) if this goes ahead that is a big percentage.

Page: [Policy H4 Meanwhile use](#)

Section: [N/A](#)

Policy H4 Meanwhile Use

4.4.2 “Meanwhile housing can be provided in the form of precision manufactured homes. This can reduce construction time and the units can potentially be reused at a later date on another site.”

Clarification is sought on the definition of “Meanwhile housing”. The implication is that it refers to what were formerly termed as ‘prefab housing’; which remained in used long beyond the temporary term, and in some cases had a detrimental effect on local neighbourhoods.

There is also the possibility that they would not comply with current housing standards, in being step free or sufficient to accommodate disabled people.

How would this fit with the Policy D2 Delivering good design?

Page: [Policy H10 Redevelopment of existing housing and estate regeneration](#)

Section: [N/A](#)

No guarantee that if accessible housing is lost it will be replaced elsewhere. We don't have enough accessible housing as it is and so if any is lost there should be a guarantee of a replacement.

4.10.3 Does the Mayor's Good Practice Guide refer to inclusive design and accessible housing? It should do.

Page: [Policy H13 Build to Rent](#)

Section: [N/A](#)

This should include the requirement to meet accessible housing standards.

Page: [Policy H14 Supported and specialised accommodation](#)

Section: [N/A](#)

The policy has highlighted the need to ensure that whilst providing supported and specialist accommodation it must be accessible.

Page: [Policy H17 Purpose-built student accommodation](#)

Section: [N/A](#)

It is disappointing to note that no specific mention is made of accessible student accommodation; which can be a problem for many disabled students applying for university places away from home. Some universities will offer to make 'reasonable adjustments' once a student has accepted a place. Unfortunately, this can create too much uncertainty for the student, when/if the adjustments will meet their needs in time to start at the beginning of term. Disabled students should not be denied the choice of living accommodation, but should have the same opportunities as non disabled students to live in purpose built student accommodation designed to meet their access needs. Disabled students have enough of a struggle with often only being able to live in university / college built accommodation for their entire student life which is more expensive than private rent not knowing from the outset if a university has accommodation to meet their needs is a further stress that they shouldn't have.

What % should be accessible and what about dog spending areas?

Page: [Policy H18 Large-scale purpose-built shared living](#)

Section: [N/A](#)

No information is contained on whether these type of dwellings would be accessible to disabled people wishing to work and live independently as part of a shared community (different from supported living). Would these type of dwellings meet some of the requirements of M4(2) and M4 (3) type dwellings?

What happens to communal kitchen in a shared living dwelling?

Page: [Policy H15 Specialist older persons housing](#)

Section: [N/A](#)

Policy H15 Specialist older persons housing

B 4) The location for storing electric mobility scooters and wheelchairs need to be reconsidered. Many older people are unable to walk more than a few steps unaided; therefore having scooter storage in close proximity to their dwellings would aid independence. The design of the spaces needs to be carefully considered to ensure that it does not cause an obstruction or hinder emergency evacuation.

Under Draft Policy H15: A1, A2, A3, add:

A4 Sites close to or embedded into traditional street neighbourhoods, with local convenience shopping and social facilities, where older people can move home as their needs change, but remain active in community life, and maintain their links to family and support networks.

A5 Sites that are large enough to meet currently registered waiting list need for accessible older person low rental housing, forecasts of the number of units demanded being based on anonymised aggregated waiting list data for residents of wards and postcodes around the development site.

Draft Policy H15: B1, B2, B3, B4, B5

Expand B1 to read

B1a affordable housing in accordance with Policy D5 Delivering accessible housing and Policy H6 Threshold approach to planning applications. There should be at least X% of low-rental, tenure blind, accommodation either in a separate block, or integrated into blocks accessed through the same entrances as are used by those households in specialised housing who lease their homes.

B1, B2, B3, B4, B5

B6 Class C3 private accommodation in supported older person housing or extra care service-supported housing should be designed to standards of internal design that are equivalent to Building Regulation M3 Option wheelchair user bathrooms, kitchens and main bedroom space layouts, but with added social space in sitting rooms and on balconies for family and neighbour visitors, a walk-in or wheel-in storage room, and either a second or third bedroom for family, volunteer or paid carer overnight stays.

B7 All public areas and communal rooms corridors and areas in Class 3 supported and extra care older person accommodation should be designed to the BS 8300-2:2018 Code of Practice for accessible building design, including the larger size of lift car (2.0M by 1.4M) conventional passenger lift option, with back-up power for use in emergency, that this standard recommends. Garden areas, kerbed vehicle access areas and other external areas should be inclusively accessible to disabled people as recommended in the BS 8300-1:2018 Code of Practice for the design of accessible places.

Page: [Policy S3 Education and childcare facilities](#)

Section: [N/A](#)

Policy S3 - welcome B7 'ensure that new developments are accessible and inclusive for a range of users, including disabled people, by adopting an inclusive design approach'. Welcome B8 'ensure that facilities incorporate suitable, accessible outdoor space'.

Page: [Policy S4 Play and informal recreation](#)

Section: [N/A](#)

Policy S4 B3

It is good to see that the needs of children for accessible routes is acknowledged.

Page: [Policy S5 Sports and recreation facilities](#)

Section: [N/A](#)

Policy S5

There is no mention of accessibility in sports and recreation facilities only facilities being in accessible locations.

Page: [Policy S6 Public toilets](#)

Section: [N/A](#)

Policy S6 Public Toilets

The proposals for free public toilets is to be encouraged rather than relying on retailers to allow customers and non-customers to use their facilities. The funding of cleaning, maintenance and security is an important issue; perhaps the use of Section 106 or Community Infrastructure Levy (CIL) funding could resolve that?

Welcome the requirement to provide Changing Places WCs in large developments, however what constitutes a larger development?

5.6.3 welcome accessible baby change.

Page: [Policy E9 Retail, markets and hot food takeaways](#)

Section: [N/A](#)

E9 Retail, markets and hot food take aways

There is no mention of accessible retail etc. too many shops are not accessible and disabled people are left with no choice for shopping around to get a good price which again adds to their cost of living disproportionately.

Page: [Policy E9 Retail, markets and hot food takeaways](#)

Section: [N/A](#)

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Page: [Policy E10 Visitor Infrastructure](#)

Section: [N/A](#)

Policy E10 Visitor infrastructure

G

The proposal to improve the offering of hotel and apart-hotel accommodation for disabled people and older is to be encouraged and provides greater opportunities for many families.

The policy only talks about showers no mention of bath some disable people need to be able to soak in a bath to help their mobility.

There is no mention of accessible parking for blue badge holders, which is vital to many disabled people to allow them to get out and about.

Could do with advice on making an apart hotel accessible to all.

Page: [Chapter 7 Heritage and Culture](#)

Section: [N/A](#)

There needs to be more encouragement for accessible night life, pubs etc. etc. and the mayor should be doing more to encourage this and to promote accessibility to these facilities. The Equality Act 2010 has done little to enhance access but the Mayor could lead on promoting accessible venues. Consideration could be given to an 'Accessible London is open for business' that promoted accessible venues in London.

Page: [Chapter 8 Green Infrastructure and Natural Environment](#)

Section: [N/A](#)

Thought needs to be given on making green space, green belt, green infrastructure to allow access for all. Access to green space is shown to have a good effect on people's mental health. Consideration should be given to encouraging public transport links with green spaces.

Page: [Policy SI1 Improving air quality](#)

Section: [N/A](#)

[Policy SI1 Improving air quality](#)

It is important for good air quality areas to be mapped so that disabled people with respiratory conditions can more easily move from one location to another.

Page: [Policy SI5 Water infrastructure](#)

Section: [N/A](#)

Policy SI5 Water Infrastructure

There is no mention of access to water filling points which is disappointing. Any water filling points should be accessible to all.

Page: [Policy SI6 Digital connectivity infrastructure](#)

Section: [N/A](#)

Policy S16 Digital Connectivity Infrastructure - would like to see digital infrastructure being used to improve accessibility and way finding.

Page: [Policy SI12 Flood risk management](#)

Section: [N/A](#)

Policy SI12 Flood risk management

No mention of ensuring accessibility even where flood is a risk, which is disappointing

Page: [Chapter 10 Transport](#)

Section: [N/A](#)

It would be good to see of more joined up provision so Shop mobility and parking together. Again there is no mention on the policy on shared surfaces or spaces. Should accessible parking apply to housing conversions?

Page: [Policy T2 Healthy streets](#)

Section: [N/A](#)

Policy T2 Healthy Streets

B

There is no information on how the Healthy Streets policy will accommodate disabled and older people who may use electric wheelchairs and mobility scooters? The use of this type of equipment increases independence; they need to feel safe and be visible to other forms of traffic whether it is motor vehicles or cyclist. There is uncertainty on where it is safe for them to travel and the lack of dropped kerbs and safe crossing point contribute to this uncertainty as well as poor lighting in the public realm. Will these issues be addressed in the new policy?

Supporting paragraph 10.55

Welcome the mention of the need to provide facilities for disabled cyclists, however it would have been nice to see this in the main T5 policy.

Page: [Policy T5 Cycling](#)

Section: [N/A](#)

[Policy T5](#) - no mention of inclusive cycling, inclusive cycle parking or cycle routes.

Page: [Policy T6 Car parking](#)

Section: [N/A](#)

Even car free development should provide some accessible parking, if no parking is provided then this inhibits access for many disabled people.

Page: [Policy T6.1 Residential parking](#)

Section: [N/A](#)

Policy T6-1 Parking

Why 3% for disabled people? Has sufficient and robust research been carried out to justify this? Who will be monitoring this to make sure that any additional accessible car parking needed up to the 10% will actually be put in place.

T6/1 E – even in car free developments there should be provision for blue badge holders

Page: [Policy T6.5 Non-residential disabled persons parking](#)

Section: N/A

T6.5 Non-residential disabled persons parking

Welcome the recognition of need. Spaces can all too often be provided and then abused so encouragement of policing such spaces should be encouraged.