

## Jinder Ubhi

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**From:** Mei-Yee Man Oram <[REDACTED]>  
**Sent:** 15 January 2018 18:44  
**To:** Londonplan  
**Subject:** London Plan - Inclusive Design Comments

Good evening

Thank you for hosting the consultation session earlier today.  
Please find my comments following this:

- **D3 – Inclusive Design**  
As per the fire section recommending that a qualified fire engineer is employed, similar to be suggested for a qualified access consultant to author the inclusive design statement? We too often see architects attempting to write these themselves, which are biased and sometimes inaccurate.
- **D11 – Fire Safety**  
Stating what a ‘major’ development means would be good, as otherwise we will have clients trying to wriggle out of providing these for the medium sized site.
- **H15 – Specialist older persons housing**  
Note that the % of accessible recommended refers back to Approved Document M, but I wonder if (given this demographic) this should be more to reflect the access requirements of the older generation?
- **S6 – Public toilets**  
Should guidance / note be given regarding the impact on numbers of toilets provided overall if gender neutral are provided over male/female? Have been hearing some discontent on this policy already from people worried that this means less provision available for women, who already have long waits for the loo.  
Wonder if the Changing Places Facility language should be stronger to push for the inclusion of these in developments – same language used as per BS 8300, and so developers able to argue out of this (e.g. what defines ‘large scale’?).
- **E10 – Visitor Infrastructure**  
Given the choice, I think most people will choose the 10%, and so there will still be a lack of hotel rooms available for assisted use (with hoists etc.). Therefore, wonder if the 15% should be pushed, or a note to say that the 10% will need to include a proportionate provision of the types specified in BS 8300 (independent, assisted, for ambulant disabled people, etc.).
- **T6.1 – Residential parking**  
Clarification should be provided here in relation to what car parking should be provided for M4(2) units.

- T6.5 – Non-residential disabled persons parking  
For car free schemes, some Blue Badge bays still to be provided – clarity is required as to what ‘some’ means.
- And some additional topics that I think require mention:
  - T5 – mention on inclusive cycling opportunities, perhaps reference to the Cycling Design Guide from TfL?
  - Shop Mobility services and connecting infrastructure in centres
  - Existing / refurbishments of residential use, and smaller sites – note to get developers to achieve the best they can (rather than to assume M4(1)).
  - Accessible student accommodation – it was mentioned in the consultation session that this would be 5% as per ADM, as there is no evidence that more is required in London. However, I would suggest research outside of London with institutions where there have been high enrolment of disabled students. It could be that there is no evidence for the universities/colleges in London, as the accessibility provisions / accommodation has been poor and so the enrolment has been low?
  - Including an indication of process for inclusive design might be useful for developers to realise the benefit of considering this earlier on in their projects.  
Where consultation with user groups should be undertaken could also be mentioned here – often we find that developers do this only if required.

Let me know if any of the above requires clarification.

Kind regards

Mei

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