

# David Bonnett Associates comments

Page: [Policy D3 Inclusive design](#)

Section: [D3](#)

**Secure by Design.** Some of the Secured by Design requirements are now in the Approved Documents. Where is this going to specified and where will guidance be that states what takes preference if Secure by Design requirements conflict with Access ones?

**Safety.** It is recommended to include reference to guidance on the benefits of providing public transport near developments, lighting, active streets and frontages, etc. They are important for vulnerable people when approaching their homes, especially in winter / in the dark.

Page: [Policy D5 Accessible housing](#)

Section: [D5](#)

**Conversions.** D5 applies only to new developments. There is a question as to whether it applies to extensions / conversions. However answer to this is unclear.

There are concerns about conversions and changes of use not needing to meet accessible housing policy at planning stage (e.g. department stores, warehouses, offices, etc converted to housing).

DBA's interpretation is that any conversions from other use to housing should still be considered "new housing developments".

Page: [Policy D5 Accessible housing](#)

Section: [3.5.6](#)

On sites that provide 10 or fewer dwellings:

**M4(3) standard.** Policy H2 G - In a site that provides 10 dwellings, a 10% is still 1 no. dwelling that could be designed to M4(3) standards if located at ground floor level. If 9 units are provided, 10% could be rounded up to provided 1no. M4(3) unit. It would be interesting to hear what local authorities think about M4(3) units not being provided, as LA's manage some housing for disabled people. Would it be maybe harder to manage one M4(3) unit on it's own on a site instead of having more of these units on one site for ease / less cost of maintenance.

**Exemption from M4(2) standard.** Where providing lift access is not feasible, dwellings above ground level could still meet M4(2) internal requirements, to set the base for fully compliant M4(2) units if a lift is provided in the future. E.g. large residential developments in central London which are allowed to take this exemption for a small percentage of the overall housing provision, but may not be facing a viability issue across the whole development (specially in regeneration sites in key locations of consolidated urban areas). All units should be M4(2) otherwise the Plan contradicts itself where it says elsewhere that spacious and accessible housing should be provided in London. Pocket Homes build on small sites and normally provide wheelchair accessible units - one good example.

Page: [Policy D11 Fire safety](#)

Section: [D11](#)

**Requirements at Planning stage.** London Plan intent is to bring fire strategy forward to the planning stage versus leaving it later stages of development. DBA's view is in agreement with this approach.

Page: [Chapter 4 Housing](#)

Section: [N/A](#)

**Mobility scooters.** DBA consider that mention to provision of mobility scooter parking should also be made under Housing policies (it has been removed from the current London Plan).

Page: [Policy H2 Small sites](#)

Section: [H2](#)

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

Section: [H14](#)

**Accommodation for young people.** This needs clarifying - children leaving care / 16-25 year olds? etc

**Accommodation for people with mental health issues who require intensive support (H14, A.5).** It is not appropriate (and will not be effective) to state that 'accommodation' by itself should be provided as an isolated provision. The kind of people who need this accommodation cannot live in it without extensive support services - the building is intrinsically linked with staff who provide support services for the residents, the accommodation on it's own cannot provide for these people. The same point applies, to A.1 (people leaving hostels, refuges and other supported housing) and A.3 (people who are ready to be discharged from hospital).

Crucially this should read short term, long term AND permanent, not short term or long term. If there is no long term accommodation provided then the people who need this provision keep having to move from place to place and sometimes away from social, health and support networks, known transport routes etc.

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

Section: [4.15.8](#)

**Mobility scooters.** "Suitable level" of storage & charging facilities is subjective and guidance to calculate adequate numbers should be provided. DBA consider that mention to provision of mobility scooter parking should also be made under Housing policies (it has been removed from the current London Plan).

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

Section: [S4](#)

**Accessible play provision.** There is guidance on this in BS 8300. It is quite good and very clear. Can this be referred to?

**Accessible routes within local area.** Who is expected to provide this?

**Incidental play space.** Provide examples / expanded explanation.

Page: [Policy S6 Public toilets](#)

Section: [S6](#)

**'Larger developments'**. Definition of the term is unclear. There is a concern regarding whether the borough definition of 'larger development' is subjective / used to argue against provision of public WCs and CP facilities.

DBA suggest that an indicative distance between public WC / changing facilities (family rooms, Changing Places) is recommended in the policy, to guide the Local Authority. Recommendations on suitable distances may be provided in Changing Places best practice?

DBA are concerned about the provisions in dense urban areas composed of small developments (e.g. town centres should have public WC / changing facilities). The boroughs need to make the decision / policy should consider this.

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

Section: [E9](#)

**Shopmobility** is not covered in the London Plan as a separate policy. It may be possible to argue D3 Inclusive Design would apply though Shopmobility is not specifically mentioned.

Page: [Policy E10 Visitor Infrastructure](#)

Section: [E10](#)

**Student accommodation** is not specifically covered. It is suggested to highlight / encourage inclusive design in supporting text—not specifying #s, but inclusion generally and for specific / common areas such as kitchens, social spaces, etc. Include reference to BS 8300-2. For example, paragraph 5.3.6. following Policy S3 Education and childcare facilities reads ‘. . . *It is important that all schools are designed to be accessible and inclusive, meeting the highest standards of accessible and inclusive design (see Policy D3 Inclusive design)*’. Sometime similar could support inclusion in student accommodation.

Page: [Policy T5 Cycling](#)

Section: [T5](#)

**General DBA comment.** Wording of policy & supporting text is still fairly open

**Facilities for disabled cyclists.** Provide some recommendations / minimum provisions. It should be required for all cycle parking to be step-free.

**Accessible cycle parking.** It would be helpful to have further guidance within policy. Also indicate by what means cycle parking should be provided to be considered accessible. Currently numbers are taken from the London Cycling Design Standards (5% accessible cycle spaces for resi and non-resi developments). Research should be done to ensure that the 5% suits demand, possibly should be different depending on the kind of development.

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

Section: [T6.1](#)

**Future provision.** Enforcement of additional 7% spaces to be made as part of planning, submitting parking management strategy showing the additional spaces. DBA comment: What will these spaces be used for in the meantime. Release of the additional parking spaces should not mean removing other facilities (e.g. play areas, gardens).

**Car-free developments.** DBA comment: London Plan requires 1:1 provision of accessible car parking bays for wheelchair user dwellings. How will this approach be reconciled with car-free developments (LB of Camden, Hackney). Are car-free developments not allowed?

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

Section: [T6.5](#)

**DBA general comment.** Policies T6.2 Office parking (H), T6.3 Retail parking (E), T6.4 Hotel and leisure uses parking (D) all specify that 'Disabled persons parking should be provided as set out in Policy T6.5 Non-residential disabled persons parking'.

**Car-free developments.** ‘Some’ Blue Badge Bay parking is subjective - no guidance provided re: #s unless reference to ‘at least one’ of policy ‘A’. Guidance / clarification should be provided on numbers and how should it be enforced. Who is obliged to provide this where the red line of a site does not include any street space? What is acceptable for developments to provide /not provide depending on their size?

Many City Centre developments have no car parking at all as the PTAL score as well as the location of the development makes it possible for all people to travel to the building ( if it is their place of work) without using their car. If it is a visitor then again similar rules might apply. If every development regardless of no general car parking provision has to have at least one on street or off street car parking space then who is to manage and police it? DBA’s view is that this provision is not a practical means to ensure that a disabled person can rely upon a parking space close to the building they wish to visit. DBA suggest that the LA should include within its highways and parking arrangements a suitably located blue badge ( or Red Badge if its the City or Westminster) space(s) as part of a planning condition for any development if the development itself cannot accommodate it on site. This might then allow a measure of facility that is accessible without relying upon a building owner to provide the space when new and then fill it with builders plant or the CEO’s car later.