

In his foreword to the Strategic Access Panel's Annual Report 2016 Sadiq Khan wrote:-

"The Strategic Access Panel is an essential component in ensuring that inclusive, barrier-free environments are created that all Londoners can enjoy. Working closely both within the GLA as well as with developers on planning applications of "potential strategic importance" within London, the Strategic Access Panel plays a key role in ensuring that disabled peoples' experiences are fully considered in the formulation of new policy and emerging development proposals."

In the SAP Aims and Aspirations in the same document, we listed

1) To assist in the creation of a City for All Londoners

To work with and support the new administration in their ambition to create a City for All Londoners; tackling and addressing inequalities, disadvantage and discrimination and preventing barriers to participation.

2) The London Plan Review

To assist the Greater London Authority with the scheduled full review of the London Plan: the spatial development strategy for London.

5) Specialist Access Expertise

The SAP would like to encourage developers to employ access professionals as part of their design teams from the outset, to ensure inclusive design is incorporated and embedded into the process at the earliest possible stage. This could include specialist access consultants or Borough level Access Officers. We reference this in our specific comments on the draft London Plan.

6) Inclusive Design Training

The Panel would also encourage developers and design teams to undertake training on Inclusive Design, access and equality, to ensure the subject is embedded and seen as an essential component of a development, and that development teams have the knowledge to recognise when specialist advice and access forum advice is needed.

7) Access Panels/Forums

The SAP would like to promote the use of site specific/area specific Access Panels. This could include Borough level access forums or groups, or groups set

up specifically for a large scale project or scheme. We reference this in our specific comments on the draft London Plan.

In 2017 the Strategic Access Panel was renamed the Inclusive Design and Access Panel (IDaAP).

The Objectives of the IDaAP include to provide comment on strategic planning proposals.

The members of the IDaAP each have appropriate experience in the area of inclusion and access. They include representatives of organisations of disabled people and relevant community groups/forums, national disability and access organisations and bodies and charities specialising in inclusion and access for disabled people.

This document is the result of our decisions and discussions at our formal meetings and has been agreed by our membership.

Overall

We believe that the principles of Access and Inclusion do not always appear to be included and referenced. We welcome the definitions of Design and Access Statements and Inclusive Design in the Definitions, but are disappointed that these appear at the end of the London Plan.

We call for a commitment to the existing Supplementary Planning Guidance on Accessible London together with a comprehensive review of this and the draft London Plan to make sure that the policy Statements are logically and correctly expanded in the relevant parts of the draft London Plan, and that there are no gaps or contradictory statements.

We call for Specialist Access Expertise, Inclusive Design Training and we promote the use of fully funded Access Panels/Forums.

Our comments are listed with reference to the chapters in the draft London Plan.

GG1 F - Support

- It is very encouraging to read this as a policy statement and having this will only assist in forwarding diversity and equality of choice.

- We think that this should highlight the differences between children, parents and parents and children, these are 3 groups that need thinking about separately.

Chapter 3 Design

- D1 - Over all, in order to meet this policy it needs a person who is suitably qualified to consult and engage with designers and developers such as a registered member of NRAC (National Register of Access Consultants). In addition a fully funded Access Panel for large developments including local interested individuals is required to ensure that access is scrutinised throughout the design and build process.
- D1 A2 - Support However, we prefer the definition included in the Appendix
- D1 A8 - Support
 - This can greatly improve an environment that is accessible to everyone and is encouraging to see.
- D1 B2 – Support
 - However, we think that a reference back to principles of Inclusive Design D1A3 should be made.
- D2 E,F,G - Support
- However, we think that this should be expanded to include references to Access Consultants and Access Panels, where relevant.
- D3 – Support, Very encouraging to see this policy.
 - In addition we think that an Access Consultant (with appropriate qualification, such as NRAC) should be employed by the developer and an access and inclusive design group or panel be set up of people expected to use the development, also to be funded by the developer, to review and feed in on the access of the design and through the build process of appropriate developments.
 - A 3rd point is needed, we recommend this links to an updated version of Accessible London SPG or other suitable guidance. Until it is redrafted continued reliance should be made on the existing SPG.

- D3 – 3.3.2 – Support, in addition this needs to look at the external interchange, the interchange between external and internal, and the internal environment.
- D3 - 3.3.4 – Support, in addition this should be expanded or as an additional point to also cover way finding and visibility for the internal environment.
- D3 – 3.3.5 – Support, we very much welcome the helpful inclusion of Fire Evacuation Lifts for all abilities.
- D3 – 3.3.7 – Support, Very much welcome the additional guidance given, and in particular the final bullet point, “detail engagement with relevant user groups such as disabled or older people’s organisations”. We recommend for larger development that it is a requirement to engage with an access panel that is appropriately resourced and engage a professional (NRAC) access design expert.
- D3 – 3.3.8 – Support, but we recommend a full updating of the SPG to ensure that a range of issues, such as neurodiversity, are covered and included.
- D5 – 3.5.3 – Support, We greatly support this and welcome it’s inclusion.
- D5 – Support - This is very encouraging but also needs to refer to large scale conversion works for existing buildings such as office block conversion.
- D5 – 3.5.6 – Object, this could be used to get out of planning standards. The number of stories should be reduced.
- D7 – Support, very much welcome
- D7 – A - greatly support and welcome this inclusion. However the policy does not mention shared space, which is an issue on which we have very serious concerns, and we think that the issue of so-called shared space should be included with guidance on issues thereof.
- D7 – G - Support, very much welcome the reference to maintenance and management.
- D7 – K - Support, but we suggest a specific statement around Inclusion.
- D11 – Support, very much welcome and support this policy, and we especially note the reference to "all building users" and in light of D5 with

the provision of accessible housing units across all levels of a housing scheme. In this, as in other cases, it would be helpful to make clear the Inclusive, Accessible element.

Chapter 4 Housing

- H2 - Object, we have great concern because disabled people may want to live on a small site, and this limits choice.
- H14 – Support, in addition this needs to be expanded to include younger disabled people.
- H15 – Support, very encouraging to see User Class C3 include a clear reference to Policy D3 Inclusive Design.
- H14 – B4, Support, very encouraging to see scooter storage.
- H16 – 4.16.10, Support, very encouraging to see a requirement for accessible development.
- H17 – Object, H17 A1 should be re-written to include a clear reference to D3 and to require a reasonable element of accessible accommodation and visitability of other units.
- H18 – Object, D5 accessible housing should be reflected in this policy.

Chapter 5 Social Infrastructure

- S6 – Support, in addition there needs to be mention of separate gender neutral toilets so access toilets are not abused.
 - S6 – A, should specifically include transport interchanges.
- S6 – B and 5.6.7, Support and very encouraging.
- S6 – 5.6.5, Support and very encouraging.

Chapter 6 Economy

- E10 – A, support, very encouraging.
- E10 - G, Support and very encouraging to see the additional provision included.
- E11 - A, Support but this could be more specific to include access for disabled people.

Chapter 6 Social Infrastructure

- SI16 - Support, in addition this needs to refer back to D3

Chapter 10 Transport

- T2 – Object, A social model should replace the medical model which appears to lie at the heart Healthy Streets.
- T3 – Support, particularly T3B3 but we think that the reference to Access needs to also include a reference to Inclusion and to refer back to D3.
- T5 – A Support, but we think that there should be a clear reference to "all people".
- T6.1 – Object, parking for accessible units need to reflect the number of accessible units. Remaining bay up to a number of 10% needs to be shown how they can be converted. This also is a less % than previous guidance.
- T6.5 – Object, how does this relate to car free developments if there are no or very few spaces.

Chapter 12 Monitoring

- The list of KPIs is very short. Important issues which do not have a KPI include:
- Design standards of housing
- Supply of specialist housing for older people
- Anything at all regarding social infrastructure
- How confident can we be that these good policies will be implemented without there being a KPI?