

Withernay Projects comments

Page: [Policy D3 Inclusive design](#)

Section: [D3](#)

D3B asks for an inclusive design statement, which is welcomed, but I see rather a lot of 'access statements' in Design and Access Statements produced by architects that in my view do not function as such. This especially happens when appointed to advise on a project *after* planning permission is awarded with a condition to provide an access statement, by which time so many constraints are set that it is much more difficult to have a positive influence of the access and inclusion of a project. Therefore the inclusion of 'an access and inclusive design statement by an independent access consultant' or similar is recommended. (This would also be consistent with the London Plan wording about fire engineers producing Fire Statements).

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

Section: [D4](#)

D4 quotes some (but not all) of the Nationally Described Space Standard (May 2016) without actually naming it (as far as I've read). This may cause confusion if the NDSS is revised and the space standards and other requirements in the London Plan no longer tallies with it. Recommend that the Nationally Described Space Standard is referred to and all repetition of the current NDSS is removed.

One exception to the repetition of the NDSS is the minimum ceiling height of 2.5m instead of 2.3m for at least 75% of gross floor area. Exceptions such as this should be stated within the London Plan, with reasoning for departing from the NDSS.

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

Section: [3.4.3](#)

While the London Plan is not a local authority, it sets out the criteria that London local authorities should seek to ensure in new developments. However, when the National Housing Standards were introduced in 2015 it was stated that local authorities should not impose space standards that are different to those in the Nationally Described Space Standard. Stating a different floor-to-ceiling height in the London Plan appears to do this (NDSS, May 2016, 10i).

Page: [Policy D7 Public realm](#)

Section: [3.7.5](#)

Please make reference to BS 8300-2 for guidance about accessible and inclusive public realm design.

Page: [Policy H2 Small sites](#)

Section: [H2](#)

H2G allows units that are not on the ground floor of a small site development to be designed to meet M4(1) only. This assumes that M4(2) housing is only suitable for people who cannot use steps, whereas a home designed to meet M4(2) has many benefits for ambulant disabled people, including elderly people. Homes in new developments should only be built to M4(1) in very exceptional circumstances, and with robust justification for proposing them. Recommend that if no step-free access can be provided then justification for this is provided in the DAS and all other provisions of M4(2) are made. (I realise that this causes an issue with how the Building Control assessment is implemented but felt it was too important to not include).

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

Section: [H15](#)

H15 B4 There doesn't appear to be mention of the provision of mobility scooters in the housing (or parking) sections of the London Plan, which I believe there should be.

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

Section: [4.15.8](#)

What is a 'suitable level' of provision for mibility scooter charging and parking? This should be defined in a similar way to provision of accessible car parking and cycle parking, ie as a proportion of the number of units.

Page: [Policy E10 Visitor Infrastructure](#)

Section: [E10](#)

E10G needs reference to BS 8300-2 to make sense of the different categories of accessible hotel rooms.

Page: [Policy T5 Cycling](#)

Section: [T5](#)

Chapter 8 of the London Cycling Design Standards does not give enough detail about number and dimensions of the spaces needed.

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

Section: [T6.5](#)

In addition to a minimum of one off or on-street accessible car parking bay, there should be a minimum of one on-street setting-down bay, that is permanently designated for this purpose and suitably designed for use with vehicle ramps at side (ie with kerbs) or rear, and with dropped kerbs.