SHAPING NEIGHBOURHOODS ACCESSIBLE LONDON: ACHIEVING AN INCLUSIVE ENVIRONMENT

SUPPLEMENTARY PLANNING GUIDANCE

OCTOBER 2014

MAYOR OF LONDON

SUPPLEMENTARY PLANNING GUIDANCE

SHAPING NEIGHBOURHOODS: ACCESSIBLE LONDON:

ACHIEVING AN INCLUSIVE ENVIRONMENT

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This guidance will form part of the over-arching Shaping Neighbourhoods Portfolio. It is currently envisaged that it will have 4 parts:

A   Social Infrastructure
B   Character and Context
C   Children and Young People's Play and Informal Recreation
D   Accessible London

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FOREWORD

London is reaping the rewards from hosting the best Olympic and Paralympic Games ever with billions of pounds of inward investment, supporting economic growth and the creation of tens of thousands of jobs. The Olympic Park and its magnificent sporting venues also demonstrated what is achievable in terms of delivering accessible buildings, infrastructure and a high quality inclusive environment. London 2012 - the most accessible Games ever - continues to have an impact on the lives of disabled and older Londoners – over 80% of those surveyed believe the Paralympic Games had a positive effect on attitude to disability.

Investment into London's transport network is bringing step free access to many rail stations and all of the DLR, accessibility on all river piers, all buses, 70% of bus stops and all black cabs. On the Tube, there is step free platform access at 66 stations, 16 more than at the time of the Games, as well as better signage. The new neighbourhoods now being built around the Queen Elizabeth Olympic Park will create some of the most accessible and inclusive neighbourhoods in London, and the eight Olympic venues in the park will maintain their high level of accessibility for future users.

My 20:20 Vision sets out what is needed for London to remain the best city in the world. I also want London to be the most accessible City in the world. We have shown what we can do in the Olympic Park and we can use that experience to ensure that all new development in London maintains this high level of accessibility - helping to change perceptions of disability and enabling disabled people to be part of our economy and fully contribute to our great city. All proposals can learn from the Olympic and Paralympic experience and can aim as high.

This is not just about disabled people. We have a growing population of older people and as we get older we all start to experience barriers to living independent and dignified lives as a result of the way buildings, places and spaces have been designed, built and managed.

The purpose of this SPG is to help anyone developing in London today to use the lessons learnt from the Games. It provides guidance on the easiest and most cost effective way to achieve these goals. It provides guidance on what measures developers can include in their building designs and operations to achieve the highest standards of access and inclusion.

We have a real opportunity to build on the legacy of the 2012 Paralympic Games. I encourage you to consider the content of this SPG and how we can continue this inclusive approach to development and make London the most accessible city on earth.

Inclusive Design

Choice Independence
Dignified Welcoming
Flexible Convenient
Easy Comfortable Safe

INTRODUCTION

"The 2012 Olympic and Paralympic Games were widely recognised as the most inclusive ever and one way we achieved that was through the design of the venues and the Park."

Sir Edward Lister
Deputy Mayor of London for Planning

1.1   Purpose of Accessible London SPG

1.1.1   One of the Mayor's aims for London is that everyone, whether resident, visitor or worker, is able to participate and enjoy all that the city has to offer. To help achieve this aim the London Plan 2011 includes a number of policies which promote an inclusive environment to help ensure that all of London's diverse communities can contribute to London's growing economy and enjoy a high quality of life.

1.1.2   The Accessible London SPG provides advice to boroughs, developers, designers and planning applicants on implementing inclusive design principles effectively and on creating an accessible environment in London, with particular emphasis on the access requirements of disabled and older people. It does not introduce new policy or add any additional burdens on developers. It does not form part of the development plan, but should be taken into account as a further material consideration when considering planning applications so has weight as a formal supplement to the London Plan.

1.1.3   This SPG:

- Provides guidance on the policies contained in the London Plan 2011 regarding the creation and promotion of an accessible and inclusive environment.

- Gives local planning authorities advice on how to incorporate and implement these policies.

- Explains the principles of inclusive design and how these principles should be applied in London.

- Gives designers ideas on where to find good technical advice and guidance.

- Provides disabled people, older people and others who experience barriers in the built environment with an understanding of what to expect from planning in London.

- Identifies legislation and national planning policy guidance relevant to the promotion of an inclusive environment.

- Provides signposts to other relevant London Plan SPG documents and Implementation Guides which impact on the delivery of an inclusive environment.

1.2   Structure of the document

1.2.1   A number of other London Plan SPGs and Implementation Guides in place or being drafted which also address the accessibility and inclusivity of London's built and external environment. Access and inclusive design principles have been mainstreamed into these other SPGs as far as is possible and appropriate, for example the GLA's Housing SPG[1] incorporates guidance on Lifetime Homes and Wheelchair Accessible Housing. The Town Centres SPG[2] addresses the need for Shopmobility schemes and the provision of accessible hotel accommodation and the SPG on Play and Informal Recreation[3] includes advice on providing inclusive children's play space. However, in the interests of keeping the SPG documents succinct and manageable some of the more specific advice, particularly around the access requirements of disabled and older people, as well as other people who experience barriers, has been included in this SPG. It was also felt important, if the interests of disabled and older and Londoners and other people who experience barriers are to be protected, to maintain one document that provides comprehensive advice

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1   *Housing Supplementary Planning Guidance,* GLA, 2012
2   *Town Centres Supplementary Planning Guidance,* GLA, 2012
3   *Shaping Neighbourhoods: Play and Informal Recreation Planning Guidance,* GLA. 2012

on achieving an inclusive environment. Implementation points are included throughout the document in blue boxes to guide boroughs and developers on the implementation of London Plan policies on inclusive design.

1.2.2   The second chapter of this document sets out the national and strategic policy context and outlines key London Plan policies (included in yellow boxes) throughout the SPG, that help to create an accessible and inclusive built environment in London. The third chapter provides an explanation of how to apply inclusive design principles to the planning and development process, in local policy development and development management practices and procedures. This includes advice on the use of access statements, access expertise and the importance of consultation covering both strategic and local access groups, and signposts the latest technical standards. The process is summarised in the RIBA Plan of Work inclusive design overlay provided in Appendix 3.

1.2.3   The fourth chapter covers the implementation and includes guidance on the different elements of the built environment from the macro level of neighbourhoods to the more detailed consideration of elements of buildings and the built environment.

1.2.4   Case study examples are incorporated throughout the document in pink boxes, providing real life good practice examples from London, illustrating how the topic in question can be addressed. Further guidance and supporting information is provided in green boxes.

1.3   Equal life chances for all

London Plan Policy 3.1 Ensuring Equal Life Chances for All

Strategic

A   The Mayor is committed to ensuring equal life chances for all Londoners. Meeting the needs and expanding opportunities for all Londoners – and where appropriate, addressing the barriers to meeting the needs of particular groups and communities – is key to tackling the huge issue of inequality across London.

Planning decisions

B   Development proposals should protect and enhance facilities and services that meet the needs of particular groups and communities. Proposals involving loss of these facilities without adequate justification or provision for replacement should be resisted.

LDF preparation

C   In preparing DPDs, boroughs should engage with local groups and communities to identify their needs and make appropriate provision for them, working with neighbouring authorities (including on a sub-regional basis) as necessary.

D   Boroughs may wish to identify significant clusters of specific groups (such as those who experience particular disadvantage and social exclusion) and consider whether appropriate provision should be made to meet their particular needs such as cultural facilities, meeting places or places of worship.

1.3.1   Policy 3.1 of the London Plan sets out the Mayor's commitment to ensuring equal life chances for all Londoners and to addressing the barriers to meeting needs and expanding opportunities for

all Londoners. This SPG helps to identify many of the barriers which act to 'disable' people in society, recommends processes and provides advice for use in the development process, that will help to create a more inclusive environment in London, enabling everyone to contribute and participate fully in society.

1.3.2   This includes understanding and addressing the physical and social barriers that prevent disabled people participating ('the social model of disability').

SPG Implementation Point 1: Equal life chances for all

The Mayor is committed to ensuring a London that provides equal life chances for all its people. Addressing the physical and social barriers that prevent disabled people participating fully and the spatial needs of London's people and communities should be considered an essential element of any new development, to enable Londoners to enjoy and contribute to a safe, secure, accessible, inclusive and sustainable environment.

1.4   Social model of disability

1.4.1   The government and the Mayor in their approach to achieving equal life chances for all recognise that using the social model helps identify solutions to the barriers disabled people experience. It encourages the removal of these barriers within society, or the reduction of their effects.

1.4.2   When initiating an inclusive development process it is important to consider the needs of disabled people in the context of the social model of disability.

Further information: Social Model of Disability

The government's Office of Disability Issues explains that the social model of disability considers that disability is created by barriers in society, not by an individual's medical condition. These barriers generally fall into three categories:

· the environment –including inaccessible buildings and services;

· people's attitudes - stereotyping, discrimination and prejudice;

· organisations - inflexible policies, practices and procedures.

1.5   Inclusive design principles

1.5.1   Inclusive design is defined by the government in the National Planning Policy Framework[4] as:

· "Inclusive design: Designing the built environment, including buildings and their surrounding spaces, to ensure that they can be accessed and used by everyone."

1.5.2   In 2006 The Commission for Architecture and the Built Environment (CABE) published a clear definition of the principles of inclusive design in its documents "The Principles of Inclusive Design They Include You"[5] and "Inclusion by Design Equality Diversity and the Built Environment".[6] These have been integrated into London Plan Policy 7.2.

1.5.3   An accessible and inclusive environment can be achieved by requiring an inclusive approach from the outset. Development agreements, development briefs and

4   *National Planning Policy Framework*, Department of Communities and Local Government, March 2012 www.gov. uk/government/publications/national-planning-policy-framework--2

5   *The Principles of Inclusive Design They Include You,* CABE, 2006

6   *Inclusion by Design Equality, Diversity and the Built Environment,* CABE, November 2008

procurement processes should be explicit about incorporating the access requirements of disabled and older people and, where appropriate, any particular access needs that women, children, or people from different faith groups may have when accessing and using the building or space.

1.5.4 The aim of the London Plan is to ensure that new development in London achieves the highest standards of accessible and inclusive design, helping to create places that work and are suitable for everyone. Meeting the principles of inclusive design can help to improve design so that the aim of cohesive and mixed communities in London can be achieved, where diverse needs are integrated and are considered as an essential element throughout, not as a 'special' or 'segregated' component for a minority, or as an afterthought at the end of the design or construction process.[7]

Further information: Inclusive design

Design that creates an environment where everyone can access and benefit from the full range of opportunities available to members of society.

It aims to remove barriers that create undue effort, separation or special treatment, and enables everyone regardless of disability, age, or gender to participate equally, confidently and independently in mainstream activities with choice and dignity.

Inclusive design is good design and is fundamental to achieving a high quality of life for all of us.

Case Study 1: Adopting the principles of Lifetime Neighbourhoods and inclusive design as core of planning principles

The Olympic Park Supplementary Planning Guidance states that all future development proposals are to adopt the principles of inclusive design effectively from the outset as a key principle. The SPG promotes the use of inclusive design strategies to help applicants achieve the vision of an inclusive environment by setting out the processes and procedures needed.

This SPG is a key document to help create a new part of London built around the Lea Valley's unique network of waterways and open spaces that link the Thames to Hertfordshire and Essex.

The SPG emphasises the importance of family housing, supported by new and improved open spaces and social infrastructure such as schools and health facilities. This will be in contrast to much recent apartment dominated development and help establish lifetime neighbourhoods where people will choose to live, settle and raise families.

1.6 A changing population

1.6.1 Analysis of the English Housing Survey identifies that currently 19% of the population of London (circa 1.5m) has a long-standing illness, disability or infirmity.[8] However London's population is set to change in composition, which could significantly increase this proportion. London will continue to be younger than elsewhere in England and Wales – there will be 17per cent more school age Londoners in 2036 and 28 per cent more aged 35-64. At the same time, the projected number of people over 64 is projected to increase by 64 per cent (nearly 580,000) to reach 1.49 million by 2036. The over 90s are

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7   London Plan Policy 7.2 An inclusive environment

8   GLA analysis of English Housing Survey 2008/09 to 2011/12

expected to grow in number, by 89,000, as medical advances, improvements in lifestyles and new technologies support improved life expectancies.[9] We will have to plan for the social infrastructure needed for young children, while also addressing the needs of an aging population. Adopting the principles of Lifetime Neighbourhoods[10], (as detailed in Chapter 4) and inclusive design should be at the core of planning principles to enable this.

SPG Implementation Point 2: The principles of inclusive design

The Mayor has adopted the social model of disability and the principles of inclusive design underpin his approach to planning. To achieve an accessible and inclusive environment consistently throughout London, the Mayor recommends that boroughs and developers understand and adopt this approach and address the physical and social barriers that can prevent people participating and making a full contribution to the economic success of their city.

The Olympic Park ©Julie Fleck

9   GLA 2013 population projections
10 *Lifetime Neighbourhoods,* DCLG 2011, www.gov.uk/
    government/publications/lifetime-neighbourhoods--2

POLICY CONTEXT

Figure 2.1: Policy Context

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                    │        NPPF         │
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                    │ THE LONDON PLAN 2011│
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| Social Infrastructure SPG | Character and Context SPG | Play and Informal Recreation SPG | Accessible London SPG |

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                    │     LOCAL PLANS     │
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                    │  DEVELOPMENT PLAN   │
                    │   DOCUMENTS (DPDs)  │
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| SUPPLEMENTARY PLANNING DOCUMENTS (SPDs) | AREA ACTION PLANS (AAPs) | NEIGHBOURHOOD PLANS (NPs) |
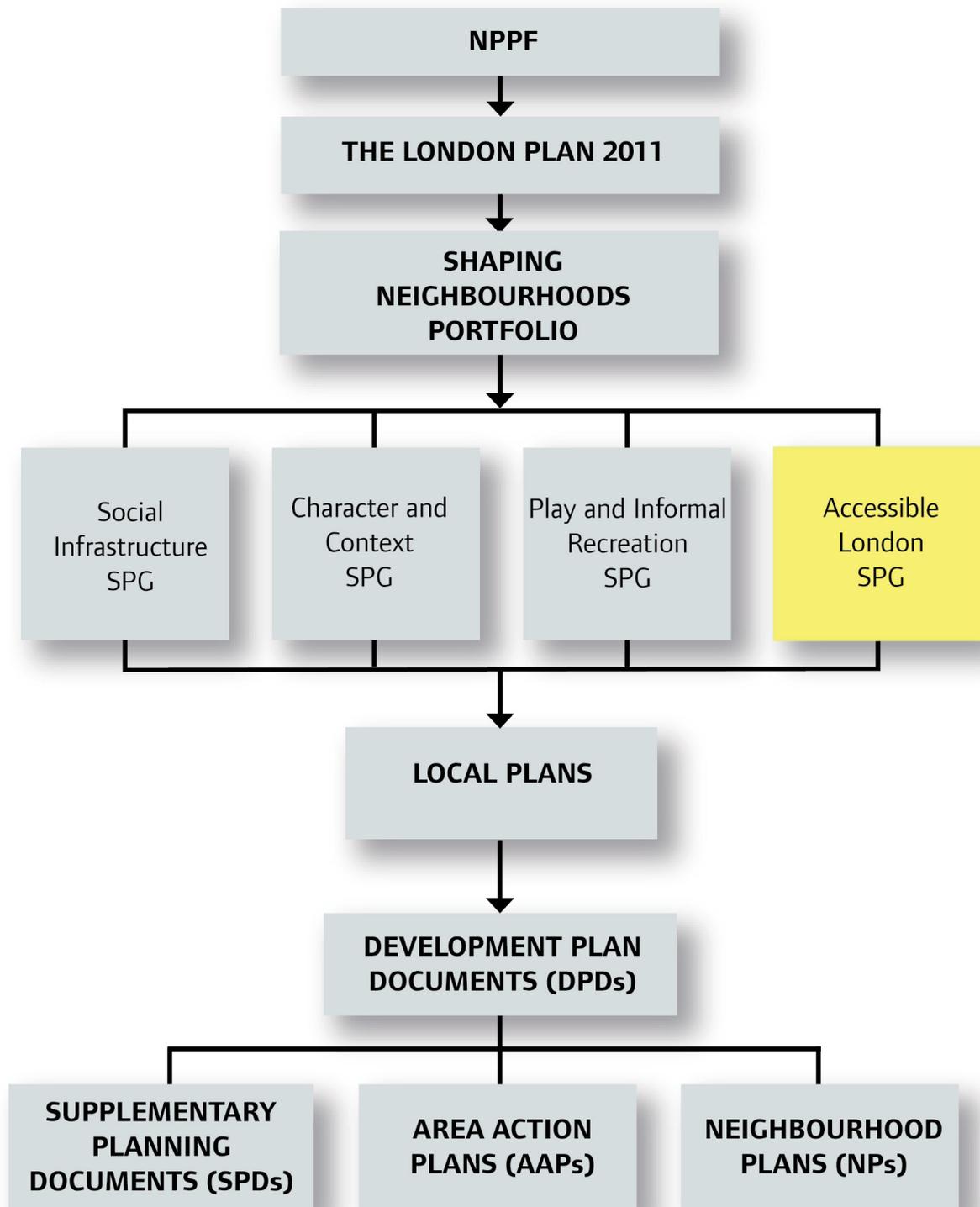
2.1 International context

2.1.1 United Nations Convention on the Rights of Disabled People: The United Nations Convention on the Rights of Disabled People aims to promote, protect and ensure the full and equal enjoyment of all human rights and fundamental freedoms by all disabled people, and to promote respect for their inherent dignity. Article 9: 'Accessibility' states that disabled people have the right to be able to access all areas of life including buildings, transport, information and communication. The UK government ratified the UN Convention on the Rights of Disabled People in July 2009.

2.2 National policy

2.2.1 Equality Act 2010: The Equality Act 2010 provides the legal framework that protects disabled people from discrimination. It replaces a range of anti-discrimination legislation, including the Disability Discrimination Act 1995 (DDA) and subsequent amendments. The Act generally carries forward the protection provided for disabled people by the DDA.

2.2.2 The reasonable adjustments duty within the Act imposes a duty on employers, service providers and public functions to make reasonable adjustments to any physical feature which may put a disabled person at a substantial disadvantage compared to non-disabled people. The is not a minimalist policy of simply ensuring that some access is available to disabled people; it is, so far as is reasonably practicable, to approximate the access enjoyed by disabled people to that enjoyed by the rest of the public. Further guidance is available from the Equality and Human Rights Commission's (EHRC) website.[1]

2.2.3 Public Sector Equality Duty: The Public Sector Equality Duty includes a general equality duty, is set out in the Equality Act 2010. Public bodies (including planning authorities) in the exercise of their functions, have due regard to the need to:
- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

2.2.4 Fulfilling Potential: The government is working to enable disabled people to fulfil their potential and have opportunities to play a full role in society. Fulfilling Potential–Making it Happen[2] underscores this commitment and aims to bring about the changes needed that have a real and lasting effect on the day-to-day lives of disabled people.

2.2.5 The government's vision is of a society that enables all disabled people to fulfil their potential and have equal opportunities to realise their aspirations. Disabled people can still face significant barriers to fulfilling their potential and playing a full part in society. Ensuring that communities are inclusive to all people enables everyone to participate in and access all aspects of society.

2.2.6 Planning and Compulsory Purchase Act: Access for disabled people was confirmed as a planning issue by the 1981 Disabled Persons Act, which introduced sections into the Town and Country Planning Act requiring planning authorities draw the attention of developers to the access needs of disabled people. The Planning

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1   www.equalityhumanrights.com/your-rights/service-users/adjustments-for-disabled-people

2   *Fulfilling Potential– Making it Happen,* Department for Work and Pensions, July 2013, www.odi.gov.uk/fulfilling-potential

and Compulsory Purchase Act 2004 introduced the concept of the design and access statement, giving weight to the idea that the developer should explicitly identify how the project or proposal takes on board access and inclusive design. This process has been helpful in ensuring that schemes address inclusive design and access from the outset rather than leaving fundamental design issues to the later detailed stages of the planning and building control processes.

2.2.7 **National Planning Policy Framework:** The government's National Planning Policy Framework (NPPF)[3] reinforces the importance of inclusive design.

Further information: NPPF guidance on Inclusive Design

Paragraph 35: "Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to:

·   give priority to pedestrian and cycle movements, and have access to high quality public transport facilities;

·   create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones;

·   consider the needs of people with disabilities by all modes of transport."

Paragraph 50: "To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should:

·   plan for a mix of housing based on current and future demographic trends, market

trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes)";

Paragraph 57: "It is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes."

Paragraph 61: "Although visual appearance and the architecture of individual buildings are very important factors, securing high quality and inclusive design goes beyond aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment."

Paragraph 58: "Planning policies and decisions should aim to ensure that developments establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit";

Paragraph 159: "Local planning authorities should have a clear understanding of housing needs in their area. They should prepare a Strategic Housing Market Assessment to assess their full housing needs… The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes)";

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3   *National Planning Policy Framework*, Department of Communities and Local Government, March 2012

2.2.8 **Planning Practice Guidance:** The government's Planning Practice Guidance sets out a number of key points to take into account when considering access for disabled people.

Further Information:Planning Practice Guidance Paragraph 012

Planning should promote access and inclusion

- Good design can help to create buildings and places that are for everyone. Planning can help break down unnecessary physical barriers and exclusions caused by the poor design of buildings and places.

- Inclusive design acknowledges diversity and difference and is more likely to be achieved when it is considered at every stage of the development process, from inception to completion. However it is often mistakenly seen as a Building Regulations issue, to be addressed once planning permission has been granted, not at the planning application stage. The most effective way to overcome conflicting policies and to maximise accessibility for everyone is for all parties to consider inclusive design from the outset of the process. This is particularly important when considering historic buildings and conservation, and highways. Thinking at the design stage about how the completed building will be occupied and managed can overcome many barriers experienced by some users. Too often the needs of users, including disabled people, older people and families with small children, are considered too late in the day.

- Inclusive design should not only be specific to the building, but also include the setting of the building in the wider built environment, for example, the location of the building on the plot; the gradient of the plot; the relationship of

adjoining buildings; and the transport infrastructure.

- Issues to consider include:
  - proximity and links to public transport;
  - parking spaces and setting down points in proximity to entrances;
  - the positioning and visual contrast of street furniture and the design of approach routes to meet the needs of wheelchair users and people with visual impairments; and
  - whether entrances to buildings are clearly identified, can be reached by a level or gently sloping approach and are well lit.

2.2.9 **Building Regulations 2010:** Part M of the Building Regulations requires that reasonable provision is made for people to gain access and use a building and its facilities. One way of satisfying Part M of the Building Regulations is to meet the guidance contained within Approved Document M (AD M)[4]. The AD M was amended in 2013 to update references to the Equality Act 2010, to make reference to Changing Places toilets, to update guidance on access statements to access strategies, and amongst other technical changes to simplify guidance on stairs and ramps, much of which is now incorporated in to Approved Document to Part K.[5] Applicants are advised to clearly indicate to the building control body how their approach to meeting the accessibility requirements of end–users of a building and its facilities demonstrates compliance with the requirements of Parts M, and where relevant Part K, of the Building Regulations.

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4   *Approved Document M - Access to and Use of Buildings, NBS,* 2013
5   *Approved Document K - Protection from falling, collision and impact, NBS,* 2013

2.3   London Plan policies

2.3.1   Policies that address the needs of disabled and older Londoners and reference inclusive design have been included throughout the London Plan to ensure that the planning system in London delivers an inclusive environment. The following are the key relevant policies:

Policy 2.4	The 2012 Games and their legacy
Policy 2.15	Town centres, including Shopmobility
Policy 3.1	Ensuring equal life chances for all
Policy 3.2	Improving health and addressing health inequalities
Policy 3.5	Quality and design of housing developments
Policy 3.6	Children and young people's play and informal recreation
Policy 3.5	Quality and design of housing developments
Policy 3.8	Housing choice
Policy 3.16	Protection and enhancement of social infrastructure
Policy 3.17	Health and social care facilities
Policy 3.18	Education facilities
Policy 3.19	Sports facilities
Policy 4.5	London's visitor infrastructure
Policy 4.6	Support for and enhancement of arts, culture, sport and entertainment provision
Policy 4.12	Improving opportunities for all
Policy 6.1	Strategic approach: Transport
Policy 6.7	Better streets and surface transport
Policy 6.10	Walking
Policy 6.13	Parking
Policy 7.1	Building London's neighbourhoods and communities
Policy 7.2	An inclusive environment
Policy 7.3	Designing out crime
Policy 7.5	Public Realm
Policy 7.6	Architecture
Policy 7.9	Access and the historic environment
Policy 7.13	Safety and security

2.3.2   The key overarching policy is Policy 7.2 An Inclusive Environment. Achieving the highest standards of accessible and inclusive design was adopted as London Plan Policy in the first London Plan published in 2004. The 2011 London Plan policy was slightly amended to form the current adopted London Plan Policy 7.2 An Inclusive Environment.

London Plan Policy 7.2 An inclusive environment

Strategic

A   The Mayor will require all new development in London to achieve the highest standards of accessible and inclusive design and supports the principles of inclusive design which seek to ensure that developments:

a   can be used safely, easily and with dignity by all regardless of disability, age, gender, ethnicity or economic circumstances

b   are convenient and welcoming with no disabling barriers, so everyone can use them independently without undue effort, separation or special treatment

c   are flexible and responsive taking account of what different people say they need and want, so people can use them in different ways

d   are realistic, offering more than one solution to help balance everyone's needs, recognising that one solution may not work for all.

B   The Mayor will assist boroughs and other agencies in implementing accessible and inclusive design in all development proposals by updating the advice and guidance in the Supplementary Planning Guidance 'Accessible London: Achieving an inclusive environment'; by continuing to contribute to the development of national technical access standards and by supporting training and professional development programmes.

Planning decisions

C   Design and access statements submitted with development proposals should explain how, following engagement with relevant user groups, the principles of inclusive design, including the specific needs of older and disabled people, have been integrated into the proposed development, whether relevant best practice standards such as British Standard BS 8300:2009 have been complied with, and how inclusion will be maintained and managed

LDF preparation

D   Boroughs should develop detailed policies and proposals in consultation with user groups that ensure the physical environment can meet the highest standards of accessibility and inclusion and that the principles of inclusive design are adopted at the earliest stages of the development process including when drawing up masterplans, area planning frameworks and development briefs

2.4   Local context

2.4.1   Borough local plans must be in general conformity with the London Plan. Ensuring that local planning policies, supplementary planning documents

and other borough planning documents address inclusive design principles will help to ensure compliance with the London Plan. The implementation points in this SPG will help boroughs when developing and reviewing their Local Plans, Core Strategies, Area Action Plans and masterplans, in their development management practices and procedures and when assessing planning applications.

2.4.2   This SPG will also help and provide guidance for developers, architects, urban and landscape designers, access consultants, facilities mangers and others with responsibility for London's built and external environment. In addition, the guidance will assist communities who are developing Neighbourhood Plans and help them be in general conformity with strategic planning policies by addressing the access requirements of the whole community.

Case Study 2: Accessible Hillingdon

Supplementary Planning Document (SPD)

Hillingdon Council Published its SPD 'Accessible Hillingdon'[1] in 2010 and updated it in 2013. It offers practical and technical best practice guidance to enable planning applicants, developers, architects, urban designers, and other professionals to adopt a tangible approach to Inclusive Design.

Accessible Hillingdon is supplementary to Hillingdon Unitary Development Plan Saved Policies R16 and AM13, London Policies 3A.5, 4B.1 and 4B.5, and the emerging Local Development Framework update, and is a material consideration in determining planning applications.

1   www.hillingdon.gov.uk/media. jsp?mediaid=10529&filetype=pdf

'Alison Lapper Pregnant' by Marc Quinn, Trafalgar Square

APPLYING INCLUSIVE DESIGN PRINCIPLES IN THE DEVELOPMENT PROCESS

3.1 Integrating inclusive design

3.1.1 Achieving an accessible environment is as much about process as it is about design and technical standards. Both the design process and the planning process should ensure that inclusive design principles are implemented in practice.

3.1.2 The planning process should be explicitly used to ensure that all new developments in London address the access needs of people from the outset. Experience has shown that if the needs of all people, and especially disabled people, are not fully incorporated from the very beginning accessibility may be overlooked, or incorporated as an 'add on' at a later stage, requiring significant redesign or adaptation post occupation resulting a less inclusive and more often a more expensive solution.

SPG Implementation Point 3: Integrating inclusive design and access from the outset

Boroughs should seek to integrate the needs of disabled people from the outset of the planning process by incorporating the principles of inclusive design in development briefs, in planning applications and in the detailed design and construction of all new development in London.

3.1.3 Inclusive design issues should ideally be discussed with the planning authority in advance of the application being submitted, to ensure that the principles of inclusive design are understood and properly incorporated into the original design concept. Pre-application meetings provide an excellent opportunity to raise access and inclusive design issues.

SPG Implementation Point 4: Pre-application discussions

Boroughs should encourage pre-application discussions with applicants to address access and inclusive design aspects of their proposals.

3.1.4 Inclusive design principles should be embedded into a project from initial conception through to completion, occupation and in the on-going management and maintenance of the building, place or space. Guidance for developers and designers on applying inclusive design principles throughout the design process is set out in the National Register of Access Consultant's RIBA Plan of Work inclusive design overlay (see Appendix 3). It highlights and explains what activity should be undertaken at each RIBA work stage to embed the principles of inclusive design from project inception to completion. The inclusive design process should be documented, reviewed, and monitored throughout the different stages of the project.

3.1.5 Boroughs and designers should work with and involve stakeholders, including the voluntary and community sectors when devising and implementing plans and guidance documents, see section 3.4 of this SPG.

Case Study 3: London Legacy Development Corporation (LLDC) Conformance Procedures

The procedures, guidance and standards described in the LLDC's Inclusive Design Standards set out their expectations for the delivery of inclusive design. They provide a process against which the application of inclusive design principles can be monitored effectively by LLDC and the project teams.

LLDC have established a design management and monitoring process aimed at delivering the highest standards of design and delivery across its programme of work. The procedures the Legacy Corporation has put in place include:

- inclusive design criteria included in the Project Brief and Selection of a Design Team;

- client review by the LLDC's Accessibility and Inclusive Design Senior Manager;

- consultation with the Built Environment Access Panel (BEAP);

- conformance reporting against the LLDC's inclusive design standards;

- LLDC's Planning Policy and Decisions Team consultation with BEAP;

- Building Control and Licensing processes addressing detailed inclusive design issues;

- post completion review to ensure inclusive design elements have been constructed/installed appropriately.

Conformance reporting by design teams

Design teams are required to follow a compliance procedure using standardised Conformance Reports. The use of these reports allows the Legacy Corporation to make informed decisions on whether the level of inclusive design provision is acceptable.

The conformance reports allow design teams to describe their approach to meeting the standards and where standards have not been met, design teams are expected to set out the alternative physical, operational and management approaches they have adopted and/or mitigation measures pursued.

INCLUSIVE DESIGN STANDARDS

LONDON LEGACY DEVELOPMENT CORPORATION

MARCH 2013

3.2 The use of design and access statements

3.2.1 The London Plan includes specific reference to design and access statements (DAS) in Policy 7.2.

3.2.2 A DAS is "a short report accompanying and supporting a planning application to illustrate the process that has led to the development proposal, and to explain the proposal in a structured way".[6] It should demonstrate how the principles of inclusive design, including the specific requirements of disabled and older people and families, have been integrated into the proposed development and how inclusion will be maintained and managed.

3.2.3 The London Plan identifies that in their design and access statements, applicants should demonstrate their commitment to achieving high quality inclusive design, how their proposals will ensure an accessible environment, how they have engaged with users (including for example organisations of disabled and older people) and the processes used to achieve these.[7]

3.2.4 Design and access statements enable local planning authorities to better understand the analysis which has underpinned the design and how it has led to the development of the scheme. This helps negotiations and decision-making and should lead to an improvement in the quality, sustainability and inclusiveness of the development.

3.2.5 Design and access statements also allow local communities, access groups, amenity groups and other stakeholders to involve themselves more directly in the planning process. This can help to increase certainty for people affected by development and improve trust between communities, developers and planners. It also enables the design rationale for the proposal to be more transparent to stakeholders and the local planning authority.

3.2.6 As part of its commitment to streamline the planning process the government has raised the thresholds of when a DAS is required. Now applications for major developments (as defined in article 2 of the Town and Country Planning (Development Management Procedure) (England) Order 2010)[8] and listed building consent must be accompanied by a DAS, but with lower thresholds applying in designated historic areas. This reduces the number of applications that will require an access statement.

3.2.7 In conservation areas and World Heritage Sites, of which there are four in London, the threshold is lower and a DAS will be required for a building or buildings where the floorspace created by the development is 100 square metres or more.

3.2.8 Whether inside or outside a Conservation Area or World Heritage Site, design and access statements should have to explain the design concepts and principles which have informed the proposed development, and to demonstrate how context has informed their scheme. Similarly, applicants are required to explain the approach to inclusive access in accordance with the London Plan and borough Local Plan policies, and state how any consultation on access issues has been taken into account. The RIBA Plan of Work inclusive design overlay (Appendix 3) outlines these activities. The Mayor will continue to encourage applicants to consider the content of the access section of the DAS as early in the development process as possible.

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6 *Guidance on information requirements and validation, DCLG, March 2010 www.gov.uk/government/uploads/system/uploads/attachment_data/file/7727/1505220.pdf*
7 *London Plan 2011, 7.8, page 212*

8 *The Town and Country Planning (Development Management Procedure) (England) Order 2010, www.legislation.gov.uk/uksi/2010/2184/contents/made*

3.2.9 Solutions to providing inclusive access will vary depending on the size, scale, nature and intended use of a development, particularly when working with an existing building or site. Where best practice standards cannot be adhered to, the access section of the DAS gives developers the opportunity to explain the constraints of the scheme and the solutions introduced to overcome any issues as well as what guidance has been applied/followed to ensure a satisfactory outcome.

3.2.10 The access section of the DAS should demonstrate how national standards, such as British Standards and project appropriate specific guidance have been applied, for example housing design standards or sports facilities guidance. It should also give details of any consultation that has been conducted with local groups, access groups and any access professionals who have been involved, for example the Borough's Access Officer or an access consultant and how this involvement has influenced the design.

3.2.11 Design details of internal features such as toilet, lift and bathroom layouts, hotel room layouts, details regarding how properties satisfy Lifetime Homes or Wheelchair Housing Standards, and details of the external approaches, parking and nearby public transport facilities can all be provided in the access statement.

3.2.12 Advice on what the Mayor expects to see in the access section of a DAS is contained in the pre-application meeting service advice note on access statements and is contained within Appendix 4 of this SPG. Care should be taken to ensure the commitments to access within the statement are consistent with the other supporting information such as the transport assessment and the drawn plans.

SPG Implementation Point 5: Design and access statements

Design and Access statements submitted with a planning application should comprehensively identify the applicants approach to inclusive design, the key issues of the scheme, and the sources and advice and guidance used in relation to access and inclusive design.

3.3 The use of access expertise

3.3.1 The use of access expertise at the beginning of the development process can:

- help to embed the principles of inclusive design into the project management process;
- integrate a wide range of access; requirements as a matter of course,
- ensure compliance with design standards throughout all design stages;
- help ensure that any particular requirements are budgeted for from the outset and that inclusive access remains a requirement until project completion.

3.3.2 The National Register of Access Consultants (NRAC) (www.nrac.org.uk) comprises of appropriately qualified and experienced access consultants and auditors who have demonstrated their expertise in access matters to the satisfaction of the NRAC Admissions Panel. NRAC core competencies and skills requirements include:

- understanding user needs;
- knowledge of construction processes;
- knowledge and understanding of good practice and standards in relation to access;
- legal understanding;
- problem identification and solving;
- professional understanding.

3.3.3   More information about the national register, the technical skills required by an independent access consultant and contact details of access consultants working in London can be found on the NRAC web site www.nrac.org.uk.

3.3.4   Some London boroughs have 'in house' access experts - Access Officers - working within the organisation who can advise on projects or specific issues in their area. The Access Association[9] has details of access professionals employed by London boroughs and access consultants working within London and is a good source of further information. Access Officers may work in a range of departments within boroughs, for example planning, building control, housing, highways, property management or equality and diversity sections.

3.4   Access groups organisations of disabled people and older people's forums

3.4.1   The involvement of people with personal experience of impairments can often help in finding creative solutions during detailed design development. The minutes of access forum/ group meetings can provide an audit trail of how inclusive access has been considered throughout the development process.

3.4.2   Engagement with local access and older people's groups can also help to highlight particular, sometimes local, access issues that need to be addressed. Disabled people are the experts in their own access requirements and the barriers they face. Discussion with designers can highlight areas of concern and help to identify particular barriers before the scheme progresses too far. Within

London boroughs there can often be a major borough organisation/ group of disabled people and smaller groups that are subject or impairment specific.

Case Study 4: Television Centre (TVC)

The application is for part retention, remodelling, refurbishment, and part demolition and redevelopment of the former BBC Television Centre and ancillary buildings, to provide up to 941 residential units in 8 plots, office space, private members club, cinema, gym, retail, café/restaurants, car and cycle parking, pedestrian and vehicular routes, and hard and soft landscaping.

The proposals have been presented to Hammersmith and Fulham Disability Forum during the planning application process on a number of occasions. The Hammersmith and Fulham Disability Forum Planning Group is hosted by Action on Disability, a disabled people's organisation.

The purpose of the consultation was to engage with the local access group and to explain the proposals and identify any areas of concern or areas that could be improved. The response to the process contributed to the design development that occurred as part of the planning approval process.

The Forum requested a number of design changes in relation to the access strategy there has been a positive response from the developer and design team to advice provided by the Forum. These changes were incorporated into the design to the benefit of the scheme.

The improvements in the accessibility of this site illustrate the value of engaging local access groups on a regular basis preferably from the pre application stage.

9   www. accessassociation.co.uk

3.4.3 Inclusion London[10] can provide details of organisations of disabled people in London and support local access groups. Boroughs should also have lists of local access groups or organisations of disabled people who operate within their boundaries.

3.4.4 The Greater London Forum for Older People[11] is a pan London umbrella organisation that supports Older People's Forums. These are local groups comprised of individuals and organisations working with and for older people in London. There is a Forum in every London borough and the aim of the forums is to support, guide and empower older Londoners to participate in their local decision making process.

3.4.5 For larger projects an access consultant could be employed to contact local disabled and older people to form a project specific group for the duration of the project. Such a group was formed for the Tottenham Football Club redevelopment proposals. The club set up a group with local disabled people along with disabled football supporters. The group met a number of times during the planning application process and helped to articulate the access issues that needed to be addressed by the designers.

3.4.6 Boroughs should endeavour to support and service regular meetings with their local access group and older people's forums, to ensure that the benefits of direct community involvement and the expertise of people with personal experience of disability can be reflected in the planning process.

3.5 The role of a strategic access forum

3.5.1 For major schemes where engagement with the developer is likely to be over a long period of time or where the local group does not have the capacity, resources or necessary specialist skills, it can be appropriate for the developer to set up a specific group for the duration of the project to consider access issues during the planning, design, construction and operation of the development. These forums are often referred to as strategic access forums and have proved to be very effective in ensuring that inclusive design principles are embedded into the scheme from the outset.

LLDC BEAP

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10 www.inclusionlondon.co.uk/Home
11 www.greaterlondonforum.org/Pages/default.aspx

Case Study 5: Access Forums

Brent Cross and Cricklewood Consultative Access Forum

The inclusive design process for the development of the Brent Cross and Cricklewood masterplan included canvassing the views of the London Access Forum and Disability Action in the Borough of Barnet. Specific accessibility workshops were held in support of the planning applications. Those invited included groups representing older people, disabled people, mental health and learning disabilities from Barnet and neighbouring boroughs, councillors and officers from Barnet Council and the GLA.

The Development Partners confirmed at these meetings that they would continue to engage with the relevant groups as the design of the development evolves with the formation of a Consultative Access Forum. The formation of such a forum was subsequently agreed within the Section 106 agreement, which set out the scope of the group terms of references for the group and the agreed funding mechanisms.

Stratford City Consultative Access Group - a developer-funded inclusive access design review panel

The Section 106 planning mechanism was used to secure funds to cover the cost of the Stratford City Consultative Access Group. The remit of the SCCAG was set out in detail within the Section 106 Agreement. The Chair of SCCAG, Peter Lainson, considers that the innovative concept of a developer-funded inclusive access design review panel has encouraged a more meaningful consultation process and dialogue. This is due not only to the monetary contribution made by the development partners, but also as a result of the investment of time and the developer's own expertise in preparing for and attending meetings.[1]

The O2's All Access Advisory Forum

The forum has been instrumental in working with AEG (the owner of the long-term lease on the O2 Arena and surrounding leisure space) to provide continuous improvements in terms of design and operations for The O2 arena since 2008. The membership is paid for attending meetings and have clear terms of reference. The group is considered to be an integral and a significantly important part of the O2 business model:

> "The advantage of creating your own access forum is that your business is the sole focus constructive than an outside group which will inevitably have a wider range of roles and objectives."

> "Also, we needed a forum that was able to input to our planning consultations. Local groups may not have the time, resource or technical expertise readily available to digest a large planning document and feedback quickly. Having your own forum means that you set the agenda, work plan, deadlines and invite the architects in to talk through the details!"

Further information on the group is available from the GLA's case study on the O2's All Access Advisory Forum[2].

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1   *Lessons learned from the London 2012 Games construction project,* ODA 2012, http://learninglegacy. independent.gov.uk/ publications/stratford-city-consultative-access-group- inclusive-acces.php

2   www.youtube.com/watch?v=HdCmsFx_8mk

Stratford City Consultative Access Group visiting the Westfield Shopping Centre prior to opening

SPG Implementation Point 6: Effective consultation

Boroughs should:

- encourage developers to engage with local organisations of disabled and older people during the pre-application consultation process;

- encourage major developers to set up suitably resourced project specific access forums, prior to submission of the planning application;

- consider the formation of consultative access forums, with appropriate funding mechanisms and terms of reference to be contained within the Section 106 agreement via the planning process, for major redevelopment schemes.

Using tactile plans for consultation

3.6 Planning conditions and Section 106 agreements

3.6.1 Changes relating to comments and recommendations for improvement identified during the consultation process described in sections 3.3 to 3.5 of this SPG, should, where appropriate, be shown on revised drawings and identified in the DAS before planning permission is granted. However, it is recognised that in some instances, changes to the scheme that have been identified cannot be achieved within the time scale for dealing with planning applications. Therefore, it may on some occasions, be appropriate to use planning conditions, which require further detail to be submitted at a later date. However the aim of considering the issue at the earliest possible stage in the process should mean that in most cases these details can be incorporated into the original planning submission and the use of conditions avoided.

3.6.2 Section 106 Agreements and developer contributions can also be used to provide added value to a scheme, by improving access and facilities for disabled and older people in the locality of the proposal. Examples of section 106 agreements secured through the planning process, which have benefited inclusive design and access include:

- consultative access forums;
- changing places facilities;
- shopmobility extensions;
- inclusive design and wayfinding strategies;
- public realm improvements;
- community spaces;
- visitor facilities including public conveniences.

SPG Implementation Point 7: Planning conditions and Section 106 agreements

Boroughs should seek to use planning conditions and Section 106 Agreements strategically to ensure implementation of the provision of inclusive access, but not as a substitute for incorporating provision from the outset of the development process.

Further information: Example of a planning condition for a shopmobility scheme

Condition The existing Shopmobility unit or temporary replacement facility will remain open and no more than of xxsq.m of new comparison retail floorspace in the xx development zone shall be occupied prior to the practical completion of the Shopmobility Works within the xx development zone. The development of the Shopmobility Works shall be carried out in accordance with the details submitted and approved.

Reason: To ensure the appropriate and timely provision of the Shopmobility.

Definitions: "Shopmobility Works" means improvement, enhancement and extension to the existing shopmobility facilities or the provision of a new facility at development in accordance with paragraph x.xx of the Development Specification and Framework

3.7 Technical Standards

3.7.1 Technical standards and guidance are very useful tools, but should be seen as minimum standards. Developers should aim to go beyond these where feasible, to ensure that London Plan Policy 7.2, which requires all new development in London to achieve the highest standard of accessible and inclusive design, is satisfied.

3.7.2 The Approved Document to Part M of the Building Regulations is often

used in design and access statements to demonstrate that the access requirements of disabled people have been addressed. However, the Approved Document is the minimum standard to demonstrate compliance with the Building Regulations and does not in itself lead to the creation of an inclusive environment.

3.7.3 With the exception of housing, this SPG does not give advice on detailed technical standards. There are many technical documents specific to different types of buildings available, for example sports facilities. These provide advice on how to ensure that a building is inclusive and easy to use for as many people as possible. Appendix 5 provides details of relevant inclusive design standards but it should not be considered an exhaustive list.

3.7.4 The most comprehensive good practice advice is in the British Standard BS 8300: 2009+A1:2010[12]. It looks at the design of buildings and their ability to meet the access needs of disabled people. It provides detailed guidance on a range of built features, including the most up to date guidance on accessible hotel bedrooms and student accommodation, wheelchair accessible toilets and 'Changing Places' toilets; however it does not provide guidance or any standards on general needs housing, but does covern hostels and hotels, residential clubs, university and college halls of residence, nursing homes and prisons, as well as the common parts of multi-occupancy residential buildings.

3.7.5 The British Standards Institution (BSI) has published a new code of practice which gives best practice advice on the design of accessible and adaptable

general needs housing, BS 9266 2013.[13] Drawing on a number of sources including the Lifetime Homes Standards, it covers car parking, external access routes to blocks of flats or individual houses, common circulation areas in blocks of flats, circulation areas within dwellings, and the provision of key rooms and facilities.

SPG Implementation Point 8: Achieving the highest standards of inclusion

The Mayor will and boroughs should encourage applicants to not only apply, but where possible exceed, the latest national design guidance on inclusive and accessible design, and aim to achieve the highest standards of safe, easy and inclusive access for all people, regardless of disability, age, or gender.

3.8 Monitoring and evaluation of the inclusive design process

3.8.1 A continual monitoring and review process should be established from the outset to ensure that inclusive design and access have been embedded into the project and that they are effectively delivered. This is the responsibility of the developer and the project team as a whole. The incorporation of inclusive design into a project should be monitored and evaluated throughout the design process to ensure that the highest standards of access and inclusion are achieved in the completed project. The following actions should be adopted:

- design team members should trained to be aware of inclusive design and understand the principles involved;
- access and inclusive design should be an agenda item at design and project team meetings;

12 BS 8300: 2009+A1:2010 The design of buildings and their approaches to meet the needs of disabled people – Code of Practice, BSI, 2010

13 BS 9266:2013: Design of accessible and adaptable general needs housing. Code of practice, BSI, 2013

- any departures from adopted design guides or national standards should be reported along with the rationale behind any alternative adopted solution or compromise for approval, together with the authority or evidence that supports such an approach;
- any such departures should be recorded in the design and access statement;
- the involvement of older and disabled people and access professionals in the design process should be documented in the design and access statement.

The London Development Database

3.8.2   The London Development Database (LDD) records selected planning permissions over set thresholds as part of the process of monitoring the Mayor's London Plan. These are tracked through to implementation, allowing the GLA to produce data on completions and the development pipeline, in addition to levels of approvals. Data from the LDD is included in the London Plan Annual Monitoring Reports (AMR). It also features on the London Datastore and on the London Dashboard.

3.8.3   The LDD records permissions meeting specific criteria only; it does not record all permissions granted within London. It does however, specifically record information from all boroughs, who are required to provide the planning permissions granted for Lifetime Homes and wheelchair accessible homes. This information is published every year in the Annual Monitoring Report (AMR).[14] The AMR published in March 2014 and updated July 2014 includes data on accessible housing in Table 3.5 of the AMR. The data in Table 3.5 shows that compliance with Lifetime Homes

standards is now standard practice for unit approvals in London. Nearly 85% of all units are now designed to meet Lifetime Homes standards and the total rises to 95% for new builds. 8.4% of homes are designed to be fully Wheelchair Homes standard compliant while 9.5% of new builds are designed to this high standard of accessibility.

3.8.4   The LDD counts new build, extensions, changes of use and conversions. Although developers should seek 100% compliance with Lifetime Homes standards, there are often practical difficulties that can arise when seeking to modify existing buildings through conversion or change of use. To ensure the highest standards of accessible and inclusive design are achieved throughout a project, the Mayor recommends demonstrating this process in the design and access statement.

3.8.5   To ensure that the highest standards of accessible and inclusive design are achieved throughout a project, the Mayor recommends demonstrating this process in the design and access statement.

SPG Implementation Point 9: Monitoring and evaluation of inclusive design

Boroughs are encouraged to demonstrate how inclusive design is reviewed and monitored to ensure the implementation of Policy 7.2.

Boroughs should ensure that their collection of data on accessible housing is accurate to assist in providing an up to date record for the AMR.

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14 www.london.gov.uk/priorities/planning/research-reports/monitoring-london-plan

IMPLEMENTATION

4.1   Lifetime neighbourhoods

London Plan Policy 7.1 Building London's Neighbourhoods and Communities

Strategic

A   In their neighbourhoods, people should have a good quality environment in an active and supportive local community with the best possible access to services, infrastructure and public transport to wider London. Their neighbourhoods should also provide a character that is easy to understand and relate to.

Planning decisions

B   Development should be designed so that the layout, tenure and mix of uses interface with surrounding land and improve people's access to social and community infrastructure (including green spaces), the Blue Ribbon Network, local shops, employment opportunities, commercial services and public transport.

C   Development should enable people to live healthy, active lives; should maximize the opportunity for community diversity, inclusion and cohesion; and should contribute to people's sense of place, safety and security. Places of work and leisure, streets, neighbourhoods, parks and open spaces should be designed to meet the needs of the community at all stages of people's lives, and should meet the principles of lifetime neighbourhoods.

D   The design of new buildings and the spaces they create should help reinforce or enhance the character, legibility, permeability and accessibility of the neighbourhood.

E   The policies in this chapter provide the context within which the targets set out in other chapters of this Plan should be met.

LDF preparation

F   Boroughs should prepare plans to ensure infrastructure and services will be delivered to meet the needs of existing and new development. Cross-borough and /or sub-regional working is encouraged, where appropriate.

G   Boroughs should work with their local communities to set goals for their neighbourhoods and strategies for achieving them.

4.1.1   Lifetime neighbourhoods[1] help to build cohesive, successful and sustainable communities. The Mayor is considering in the draft Further Alterations to the London Plan (FALP)[2] three principles to help frame the concept of lifetime neighbourhoods as places where people at all stages of their lives:

1.   can get around – neighbourhoods which are well-connected and walkable;

2.   as far as possible, can have a choice of homes, accessible infrastructure and services, places to spend time and to work, with a mix of accessible and adaptable uses; and

3.   belong to a cohesive community which fosters diversity, social interaction and social capital.

4.1.2   Whilst in many parts of London there will be opportunities for embedding lifetime neighbourhood principles in the creation of new communities, through for example Opportunity Area Frameworks[3]; for the majority of London it will be about retrofitting existing

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1   *Lifetime Homes Lifetime Neighbourhoods: A National Strategy for Housing in an Ageing Society,* DCLG, February 2008

2   *Draft Further Alterations to the London Plan,* GLA, January 2014 www.london.gov.uk/priorities/planning/consultations/draft-further-alterations-to-the-london-plan-january-2014#sthash.AiEKsV4v.dpuf

3   www.london.gov.uk/priorities/planning/opportunity-areas

neighbourhoods to embrace the lifetime neighbourhoods principles. It should also be recognised that the underlying concept of lifetime neighbourhoods is that of inclusion - making neighbourhoods work well for people of any age but recognising that an increasing proportion of the population will be older.

4.1.3 Particular features of a neighbourhood that should be within easy reach of people's homes include, but are not limited to;

- public transport;
- basic amenities including child care and health provision;
- local shops;
- community halls and meeting places;
- public spaces and green and open spaces.

4.1.4 People should be able to live and work in a safe, healthy, supportive and inclusive neighbourhoods with which they are proud to identify.[4] Access to a choice of good quality affordable housing is fundamental to people's quality of life and well-being. At all stages of people's lives, not only the design of individual properties but also the environment in which that housing is located can have a huge influence on people's independence, involvement in society, their feelings of safety and their health and welfare. Further information on the importance of housing is included in section 4.4 of this SPG and the Housing SPG.

4.1.5 For many people the availability of accessible and reliable public transport is needed to lead an active and independent life. Where people are unable to drive and essential opportunities such as employment,

education or more generally, opportunities for social interaction, are located at some distance, they will either miss out, incur great additional personal expenditure for taxi fares or rely on a carer to drive them. Further information on the importance of accessible transport options is provided within section 4.3 of this SPG.

4.1.6 People should have easy access to services and facilities that are relevant to them.[5] Social infrastructure is integral to the creation of lifetime neighbourhoods, and will help to bind communities together through the promotion of social interaction as well as allowing them to lead healthy active lives.

4.1.7 Social infrastructure covers a wide range of facilities such as health provision, nurseries, schools, colleges and universities, community, cultural, play, recreation and sports facilities, green infrastructure in all its forms, places of worship, fire stations, policing and other criminal justice or community safety facilities and many other uses and activities which contribute to making an area more than just a place to live.

4.1.8 Neighbourhoods also need to have basic facilities such as public toilets and accessible seating consciously planned into proposals at the outset.

4.1.9 Understanding the existing and future social infrastructure requirements, including proximity, capacity and accessibility of that infrastructure is important. Further information is also included within section 4.6 of this SPG on access to social infrastructure and within the draft Social Infrastructure SPG.[6]

4.1.10 Outdoor space should be inclusive as possible. Ensuring that families with small children, older people and disabled

4 *Building for Life* , Building for Life Partnership (Commission for Architecture and the Built Environment (CABE), Home Builders Federation and Design for Homes), 2008

5 London Plan 2011, paragraph 3.86
6 www.london.gov.uk/priorities/planning/consultations/draft-social-infrastructure-supplementary-planning-guidance

people can move around, enjoy and feel secure in their neighbourhoods, enables everyone to participate in, and contribute to, the life of the community. People should be able to navigate their way easily around their neighbourhood through high quality spaces, while having good access to the wider city. They should have access to a network of open and green spaces that meets their recreational needs.

4.1.11 The natural and built environment should reinforce a strong, unique local history and character. It is essential to understand the existing character and context of a place in order to help set priorities for the future and help inform the implementation of the principles of Lifetime Neighbourhood.

4.1.12 Lifetime neighbourhoods should also focus on the connections and spaces between buildings which are often overlooked when neighbourhoods are created on a development by development basis.

4.1.13 The London Plan identifies in paragraph 7.5 that increasing the opportunities people have to access and participate in their communities will help all Londoners to enjoy and feel secure in their neighbourhoods.[7] Social networks, in particular, can enhance the way in which individuals are able to engage with their neighbourhoods and beyond, linking in to different groups, activities and facilities that are available.

Neighbourhood Planning

4.1.14 Under the Localism Act 2011, neighbourhood planning can have a significant impact on the future of a local area and can play a positive role in developing lifetime neighbourhoods. The Further Alterations to the London Plan identifies that Neighbourhood Plans are one mechanism for both the boroughs

and community-led groups to agree on local priorities[8]. The National Planning Guidance identifies that neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. It provides a set of tools for local people to help ensure that they get the right types of development for their community where the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area.

4.1.15 Ensuring there is shared understanding and requirements for local social infrastructure and the quality of the physical environment is therefore essential. Residents should be enabled to influence local decisions by working with statutory, voluntary and community bodies to identify priorities for action within their own areas as part of the process of forming lifetime neighbourhoods. Therefore where Neighbourhood Plans come forward, they will need to address inclusive design issues in regards to the local community.

SPG Implementation Point 11: Neighbourhood Planning

Neighbourhood Plans should promote the principles of inclusive design and lifetime neighbourhoods through resident engagement.

Consultation and involvement

4.1.16 Boroughs should be clear about their expectations for their communities and their neighbourhoods. They should work with local communities and communicate strategies for meeting these expectations.

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7   *Inclusion by Design Equality, Diversity and the Built Environment,* CABE, November 2008

8   Further Alterations to the London Plan, paragraph 7.6

4.1.17 The development of lifetime neighbourhoods should also involve local people. The Department for Communities and Local Government's report 'Lifetime Neighbourhoods',[9] identifies that: "How lifetime neighbourhoods are achieved is just as important as what is done to bring about necessary changes. An emphasis on process draws attention to the way that residents themselves can bring about change within the areas in which they live. It is not possible to be prescriptive about the specific features of lifetime neighbourhoods that should be developed in all areas. Residents, however, should be enabled to influence local decisions by working with statutory, voluntary and community bodies to identify priorities for action within their own areas."

4.1.18 It should also be recognised that communities are not homogenous groups of people and may differ in their aspirations and expectations for their neighbourhood. This will need to be managed in a way that fosters diversity in order to build and stronger and more cohesive community.

4.1.19 Further information on consultation and involvement of older and disabled Londoners is contained within Sections 3.4 and 3.5 of this SPG.

SPG Implementation Point 11: Lifetime neighbourhoods

Boroughs should plan across services to ensure the nature and mix of existing and planned infrastructure and services are complementary and meet the needs of existing and new communities. Cross-borough and/or sub-regional working is encouraged, where appropriate.

Developers should illustrate in their design and access statement how the principles of Lifetime Neighbourhoods have been applied to the development in terms of identifying:

· nearby services and facilities;

· access to public transport;

· local shops, community and cultural facilities, healthcare services, educational facilities, public spaces and other social infrastructure;

to ensure that neighbourhoods are inclusive, accessible, welcoming and sustainable.

Further information: Guidance on Lifetime Neighbourhoods

· **Lifetime Neighbourhoods,** DCLG, 2011 (www.gov.uk/government/ publications/ lifetime-neighbourhoods—2) The Foundation for Lifetime Homes and Neighbourhoods (www.lifetimehomes.org. uk/pages/lifetime-neighbourhoods.html)

· **Neighbourhood Planning**, http:// planningguidance.planningportal.gov.uk/ blog/guidance/neighbourhood-planning/

· **Town Centre SPG** - this focuses on the role that town centres, including neighbourhood and more local centres, might play in promoting lifetime neighbourhoods. The SPG highlights five activities that boroughs are encouraged to do:

i. develop the role of town centres (including neighbourhood and more local centres) as the core of lifetime neighbourhoods;

ii. plan for 'walk to' services, especially in smaller centres to secure sustainable neighbourhoods;

9 *Lifetime Neighbourhoods,* DCLG, 2011 (www.gov.uk/ government/publications/ lifetime-neighbourhoods—2)

iii. develop the role of centres as part of healthier neighbourhoods and help to reduce health inequalities;

iv. promote local ownership and occupation of public space;

v. provide a policy framework for maintaining, managing and enhancing local and neighbourhood uses, activities and facilities, that are inclusive and accessible.

- **Social Infrastructure SPG** – This SPG sets out a process that can be used for assessing the strategic and local infrastructure requirements of an area.

- **Character and Context SPG** –This SPG provides guidance on the physical, cultural, social, economic, perceptional and experiential attributes of character and context which should be taken into account in understanding different places.

- **Housing SPG** - This SPG provides guidance on implementing the key LP policies which bear on planning for residential developments. In addition to housing quality it covers social infrastructure provision, place shaping, mixed and balanced communities, the open and natural environment, transport and better streets including parking, cycling and walking.

- **Play and informal recreation SPG** – This SPG provides guidance on diversity in lifetime neighbourhoods, neighbourhood playable space and the role playable spaces have in creating lifetime neighbourhoods.

- **Green infrastructure and open environments SPG** - This SPG provides guidance on the implementation of London Plan policy to:

  - Protect, conserve and enhance London's strategic network of green and open natural and cultural spaces,

to connect the everyday life of the city to a range of experiences and landscapes, town centres, public transport nodes, the countryside in the urban fringe, the Thames and major employment and residential areas;

- Encourage greater use of, and engagement with, London's green infrastructure.

(www.london.gov.uk/priorities/planning/ supplementary-planning-guidance)
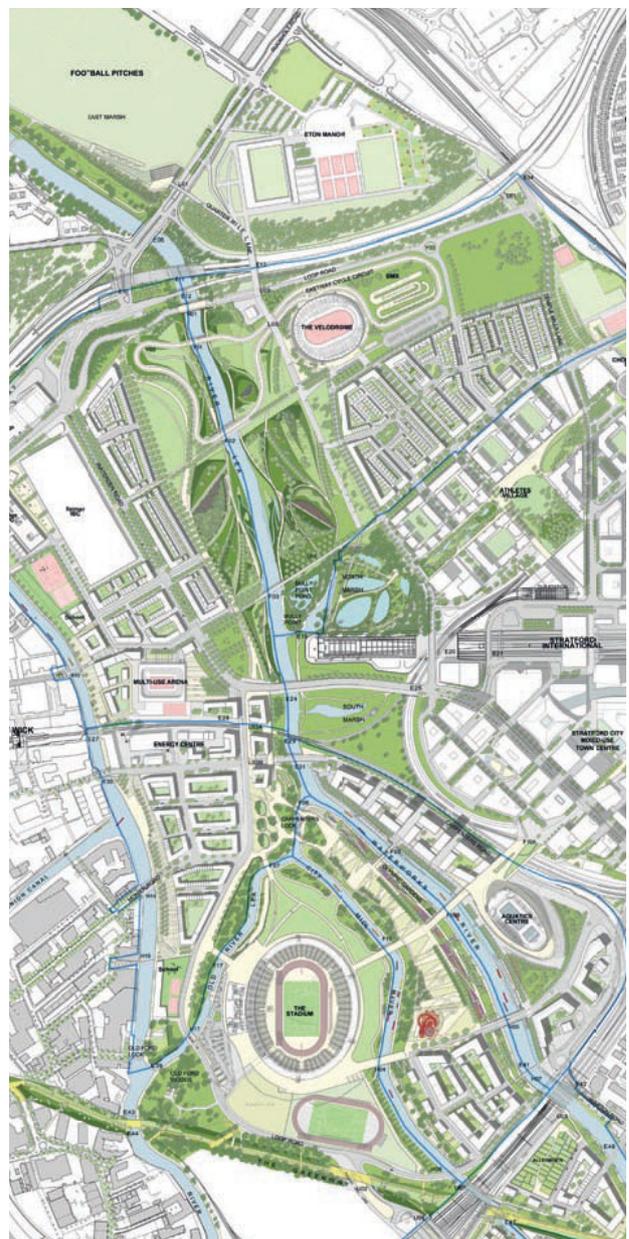
Illustrative Legacy Communities Scheme © LLDC

4.2   Public realm, amenity and play space

London Plan Policy 7.5 Public realm

Strategic

A   London's public spaces should be secure, accessible, inclusive, connected, easy to understand and maintain, relate to local context, and incorporate the highest quality design, landscaping, planting, street furniture and surfaces.

Planning decisions

B   Development should make the public realm comprehensible at a human scale, using gateways, focal points and landmarks as appropriate to help people find their way. Landscape treatment, street furniture and infrastructure should be of the highest quality, have a clear purpose, maintain uncluttered spaces and should contribute to the easy movement of people through the space. Opportunities for the integration of high quality public art should be considered, and opportunities for greening (such as through planting of trees and other soft landscaping wherever possible) should be maximised. Treatment of the public realm should be informed by the heritage values of the place, where appropriate.

C   Development should incorporate local social infrastructure such as public toilets, drinking water fountains and seating, where appropriate. Development should also reinforce the connection between public spaces and existing local features such as the Blue Ribbon Network and parks and others that may be of heritage significance.

LDF preparation

D   Boroughs should develop local objectives and programmes for enhancing the public realm, ensuring it is accessible for all and reflects the principles in Policies 7.1, 7.2, 7.3 and 7.4.

4.2.1   The design of the external environment and the public realm is an essential consideration if an area is to be inclusive and accessible. However, the focus tends to be on the design of the buildings not on how people get to the buildings. This approach is reinforced by the fact that most technical design guidance and access standards cover the immediate approach to buildings, and the buildings themselves. Very few documents address inclusive design of the public realm, public space, or the areas between buildings. Highway infrastructure such as the design of dropped kerbs, tactile paving on footways and at pedestrian crossings and blue badge parking are covered in a number of documents.

4.2.2   Transport for London has a number of documents that provide advice on the provisions needed in the public highway to ensure suitable and inclusive access for all people. For example see 'Taking Forward the Mayor's Transport Strategy Accessibility Implementation Plan'[10] and the Mayor of London's 'Better Streets' guidance.[11] There is also the Government's 'Manual for Streets'[12], 'Manual for Street 2'[13] and the Department for Transport's 'Inclusive Mobility'.[14]

4.2.3   However highways are only a part of the external environment. Research has shown that if designed inclusively, outdoor environments have the potential to benefit older people, including people with dementia, in a number of ways. Well-designed outdoor spaces can enhance the long- term health

10 *Taking Forward the Mayor's Transport Strategy Accessibility Implementation Plan,* Transport for London, 2012, www.tfl.gov.uk/corporate/11610.aspx#page-link-transport-system-accessibility

11 *Better Streets,* GLA, 2009 www.london.gov.uk/sites/default/files/Better%20Streets.pdf

12 *Manual for Streets,* Department for Transport, 2007

13 *Manual for Streets 2 - Wider Application of the Principles, a companion guide to Manual for Streets,* Chartered Institution of Highways and Transportation, 2010

14 *Inclusive Mobility,* Department for Transport 2005

and wellbeing of those who use them regularly[15].

4.2.4 An inclusive public realm is made up of a coordinated network of legible, safe and accessible routes which provide convenient links to all neighbourhood services, such as retail provision or community facilities, transport connections, public spaces for recreation as well as social activities and other public amenities. The external areas between buildings, public space, open space and amenity areas, are just as important as the buildings themselves. Everyone uses the external environment; this is quite often to access buildings and their approaches without first using the external environment, which is why surrounding areas need to be designed carefully, based on inclusive design principles.

4.2.5 The London Plan[16] identifies that the quality of the public realm has a significant influence on quality of life. It affects people's sense of place, security and belonging, as well as having an influence on a range of health and social factors. For this reason, public and private open spaces, and the buildings that frame those areas should contribute to the highest standards of comfort, safety and ease of movement

4.2.6 Key issues to consider are suitable crossing facilities that serve existing and predicted desire lines, gradients and changes in level, appropriate paving materials, legibility, signposting, lighting, tactile paving, seating and public art. This is not an exhaustive list but some key points are raised below:

· Legibility of layout and definition by texture and colour and contrast as well as signposting can make an important contribution as to

whether people feel comfortable in a place, are able to understand it and to navigate their way around. This applies to older and disabled people, including (but not limited to) people who are blind or partially sighted, people with cognitive impairments, neuro-diverse conditions or learning difficulties. The removal of excessive clutter, the grouping of essential street furniture and consistency in visual and audible clues can assist navigation and orientation for all of us.

· The lighting of the public realm requires careful consideration to ensure that places and spaces are appropriately and consistently lit. Creating dark spaces or areas of shadow or glare can be problematic in terms of actual and perceived safety and personal security and may cause confusion for people who are partially sighted.

· Paving material should be carefully considered. Any pattern or layout should not be confusing, misleading or disorientating. Blind and partially sighted people, older people with certain eye conditions, people with certain learning disabilities and cognitive impairments can have problems with highly patterned highly contrasting surfaces, especially if the pattern suggests a level change or feature where one does not exist. For example a linear pattern that is similar or identical to steps with a contrasting nosing may imply the continuation of the steps. Careful consideration should be given to surface finishes to avoid such potential problems.

· Unnecessary changes in level should be avoided. Where a change in level is required, design solutions should be inclusive and

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15 Inclusive Design for Getting Outdoors, www.idgo.ac.uk/theories_and_methods/index.htm
16 London Plan 2011 paragraph 7.16

Case Study 6: Clink Street

Access improvements to Clink Street in the Southbank were carried out as part of the London 2012 Paralympic Inclusive Design project. Working with the London Boroughs of Southwark and Lambeth. The GLA invested £4 million to improve pavement layouts, install better lighting and signage, increasing seating and provide Additional features including ramps and handrails. Careful consideration was given to addressing the access requirements for disabled and older people and the historical significance of streetscape.

The photographs show Clink Street access improvements before and after the works. Cobbles and narrow pavements have been replaced with a smooth and level surface that retains the character of the existing streetscape.
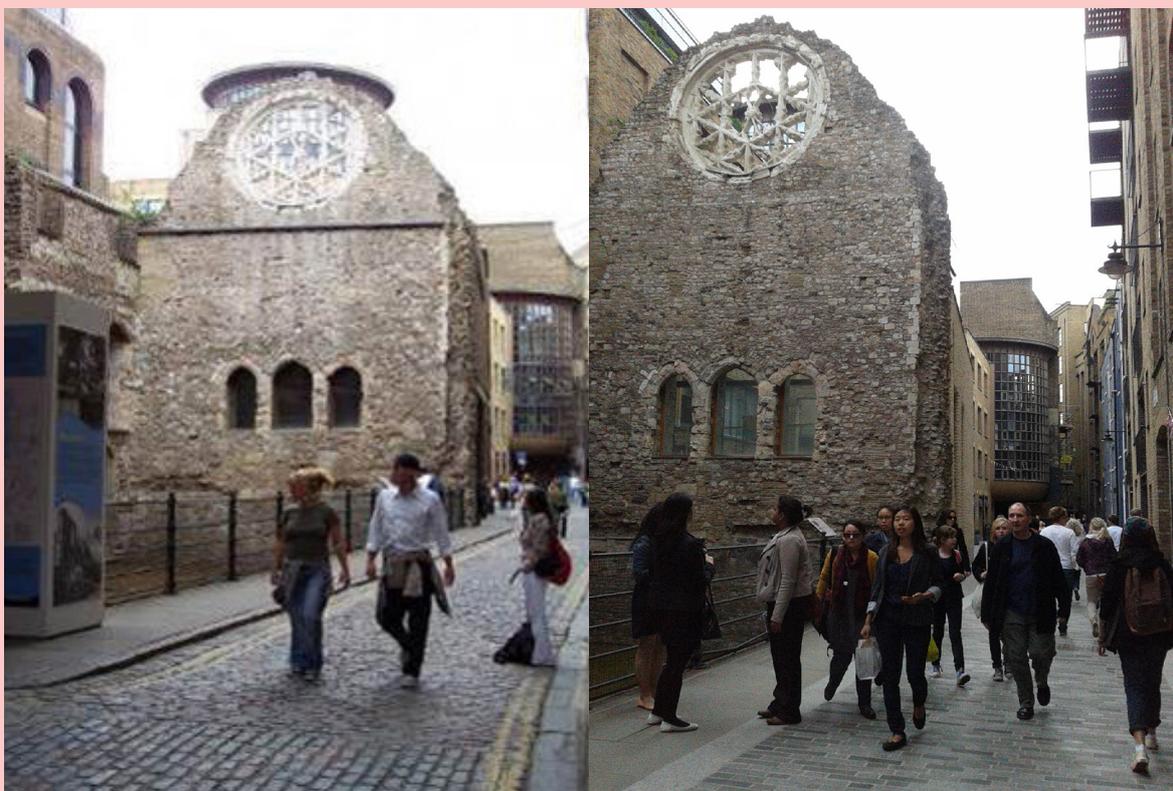
of the highest standard in terms of accessible design. Gradients should be minimised, and formal ramps (gradients between 1:20 and 1:12) in addition to steps should only be considered as a last resort, once level access or gently sloping access solutions have been exhausted.

4.2.7 External ramps (where unavoidable) and steps should be designed in accordance with the latest design guidance, as an absolute minimum, and developers are encouraged to exceed these standards where possible. British Standard BS 8300:2009 + A1:2010 5.8 and 5.9 provide guidance on external ramp and step design.

4.2.8 Tactile paving can help people who are blind or partially sighted people, navigate the environment. The Department of Transport guidance on tactile paving supports layouts that are consistent.[17] Blind and partially sighted people will learn the layouts and situations that the different types

17 *Guidance on the Use of tactile paving,* Department of Transport, 2007, www.gov.uk/government/publications/guidance-on- the-use-of-tactile-paving-surfaces

Case Study 7: London 2012 Olympic Park concourse

Through careful planning and a coordinated masterplanning team, with clear inclusive design principles integrated into the brief, the Olympic Park designers achieved a 1:60 (level) gradient across most of the public concourse areas, despite the substantial level changes that the railway, canals and rivers created.

Steps and ramps were not incorporated into any of the primary circulation routes, making the park accessible for everyone. A mixture of shortcut stepped access and shallow graded routes provided access from the upper concourse down to the canals and river. The plan identifies the gradients achieved across the park.

© ODA
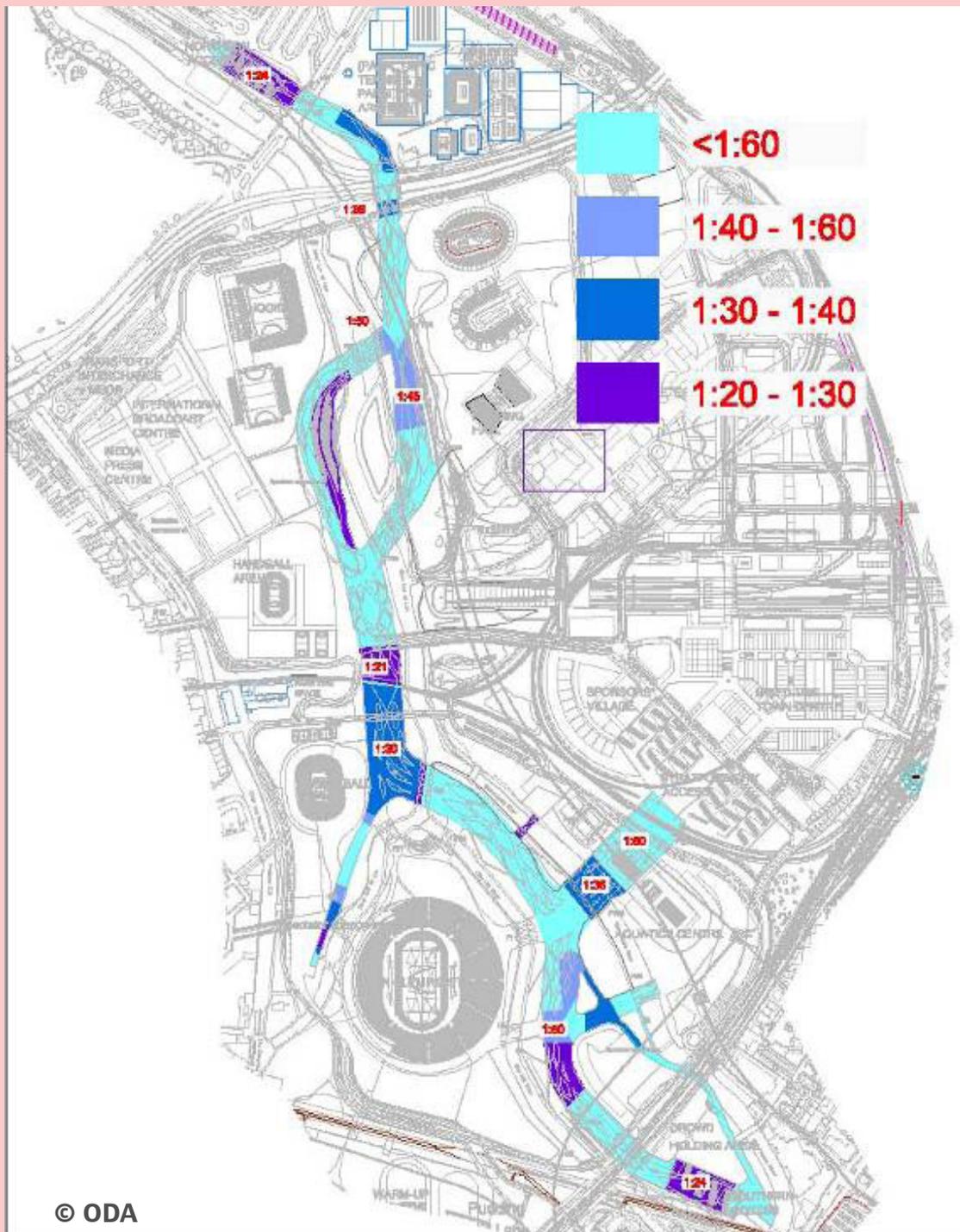
of paving are used in. For example blister paving is applied differently for controlled and uncontrolled crossings, corduroy tactile paving is used at the top or bottom of steps to indicate a change in level. Consistency is key to ensuring the reading and interpretation of tactile paving is transferable between different locations and is particularly important for people moving comfortably and confidently across borough boundaries.

4.2.9   The public realm should include spaces where people choose and want to spend time. Suitable seating and resting points are essential for some disabled and older people to assist them on their journey, or to enjoy the space. Choice in the design of seating is just as important. For example the provision of seating with armrests and backrests will cater for people with reduced mobility who find it difficult to raise or lower themselves into a seat. Space between seating allows a wheelchair user to sit alongside their families and friends. Space at the end of a bench, clear of the arm rests, will allow a wheelchair user to transfer out of their wheelchair and onto the seat. Further detail is provided in BS 8300:2009 + A1:2010, 5.1.

4.2.10 The provision of public toilets allows many people to spend more time in an area, to dwell and linger and enjoy the space (see Section 4.6). Toilets are not just important for families with small children, for pregnant women, some disabled people and for older people, but for the 7 million people in the UK who have an over active bladder.

4.2.11 Public art and water features should be designed so that everyone can enjoy them. Warning at ground level may be needed to enable people using white canes to negotiate an area and to help them avoid any potential hazards. This could be through textured surfaces,

Case Study 8: Accessible Seating: Marchmont Street Community Gardens

The garden is a regeneration of a service access area to create a community garden. This new public open space was developed by the local community. Public participation and community consultation were been the driving force of the project. Local community group, the 'Marchmont Association' steered this project to local identity and provide an important amenity asset for the neighbourhood. The garden provides a range of seating types as choice is an important element of making the seating inclusive:

· spaces that ensures that wheelchair users can sit adjacent to companions, not pushed out in front obstructing the walkway for others;
· seats with arms and backrests to support people with limited mobility.
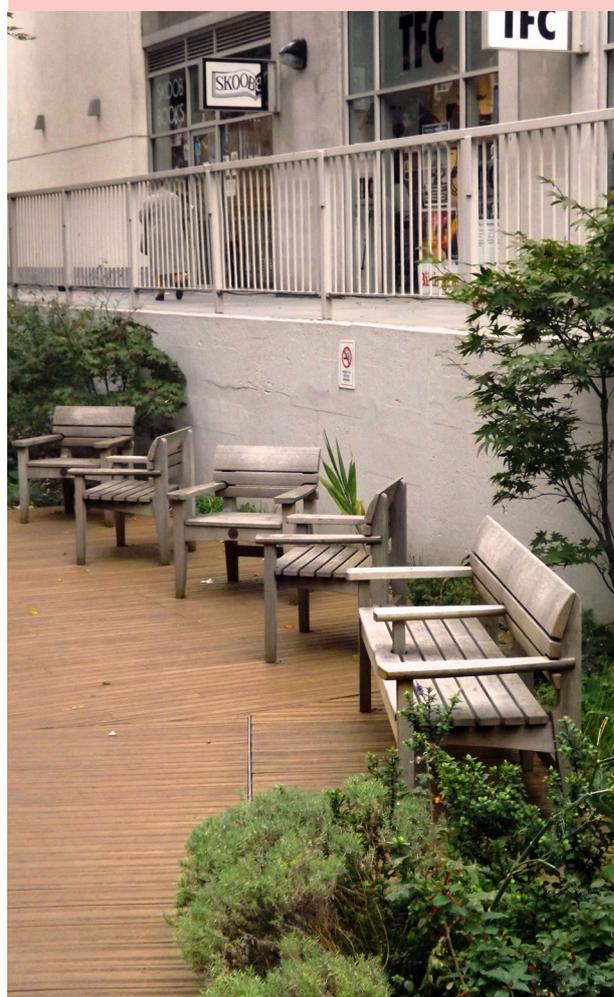
tapping rails or the use of plinths, but not through the misapplication of tactile paving. Care should be taken to ensure artworks do not protrude into the path of travel in such a manner that they would present a hazard to pedestrians.

Case Study 9: Public art located on a plinth providing ground level detection

As part of the London 2012 Summer Like No Other Festival the Greater London Authority installed a number of Olympic and Paralympic mascots on Discovery Trails throughout central London.

The mascots were raised on plinths so that any outstretched limbs were not a hazard for people passing by, which is particularly important for blind and partially sighted people.

sonnet wenlock © designboom

SPG Implementation Point 12: Public realm

Areas of public realm should incorporate the highest standards of accessible and inclusive design.

Developers and local planning authorities should ensure that the latest design guidance on accessible and inclusive public realm should be applied if not exceeded. The requirements of disabled and older people should be carefully considered in the design of public realm schemes to ensure that the scheme benefits the community it serves by being safe, comfortable, legible and permeable.

Community safety

4.2.12 The London Plan identifies the importance of safe and secure environment in London that is resilient against emergencies including fire, flood, weather, terrorism and related hazards.[18] For developments where flood levels do need to be planned into a scheme, careful consideration should be given to inclusive design. Inclusive design should not be sacrificed. An imaginative solution, taking into account flood levels and the impact this may have on finished floor levels (for example) should be achieved which ensures an inclusive solution. DCLG identify that "if the lowest floor level is raised above the predicted flood level, consideration must be given to providing access for those with restricted mobility. In considering appropriate resilience measures, it will be necessary to plan for specific circumstances and have a clear understanding of the mechanisms that lead to flooding and the nature of the flood risk by undertaking a flood risk assessment".[19].

18 Policy 7.13 Safety, Security and Resilience to Emergency
19 Technical Guidance to the National Planning Policy Framework, DCLG, 2012

4.2.13 Certain developments may have a greater need to consider security than others. Again, inclusive design should be considered at the same time as any security measures, for example hostile vehicle mitigations, to ensure a solution which satisfies both objectives. Problems can occur when elements, for example security or inclusive design, are considered in isolation from one another, or one before the other- the latter becoming a problematic 'tag-on' to the former.

4.2.14 It should also be noted that TfL and planning authorities have a legal obligation under Section 17 of the Crime and Disorder Act 1998 to exercise their various functions with the need to do all that they reasonably can to prevent, crime and disorder in its area.[20].

4.2.15 'The benefits of designing for community safety should not be underestimated, particularly for more vulnerable people, including children, young people and older residents'[21] . Designs should seek to promote natural surveillance.

> **SPG Implementation Point 13: Community safety**
>
> Security and anti-flooding measures should be considered and planned in conjunction with inclusive design, as early on in the design process as possible, to ensure solutions which satisfy security and environmental requirements and are inclusive and accessible for disabled and older people.

Shared space

4.2.16 The supporting text to Policy 7.5 Public Realm[22] highlights the principles of shared space, as does Policy 6.10. It also highlights the importance of routes being easy to navigate and also states that measures to improve walking should also enhance the street conditions especially safety, security and accessibility for disabled people.

4.2.17 The principles of shared space involve decluttering the streetscape by removing unnecessary obstacles and simplifying the area, all of which have benefits in terms of access and can add to inclusive design.

4.2.18 In terms of inclusive design, the removal of kerbs which can be problematic. Kerbs provide many disabled people with the confidence that they are segregated from traffic, and kerbs can provide blind and partially sighted people with a 'shore line' to follow, to help them navigate an area, particularly in the absence of a clear and uncluttered building line to follow at the opposite edge of the pavement. Kerbs are also important as they are required for taxi and bus ramps to be deployed safely and for people stepping down from side access minibus transport.

4.2.19 If a shared space is being proposed, very careful consideration should be given as to whether the area is suitable for such an approach (taking into account the volume of pedestrian compared to traffic flows, and types of traffic using the area i.e. bicycles, buses, HGVs an so forth). Careful consideration should be given to ensure that any shared space does not reduce access to important social infrastructure such as local amenities and shops. Stakeholder engagement is critical part of the design process, to allow disabled people and disabled peoples organisations

20 www.legislation.gov.uk/ukpga/1998/37
21 *Streetbook SPD,* Islington Council, 2012

22 London Plan 2011 paragraph 7.18

specialising in this area to influence the proposals. Schemes should incorporate a 'safe zone', to delineate optional routes specially for pedestrians only, to ensure people have the option of a route they can feel safe using. This could be defined by using street furniture or landscaping features, for example trees, but it should not be possible for vehicles to travel or park on it. Manual for Streets[23] identifies that a protected space, with appropriate physical demarcation, might need to be provided, so that those pedestrians who may be unable or unwilling to negotiate priority with vehicles can use the street safely and comfortably. Clearly defined safe crossing points should also be provided.

4.2.20 Careful consideration should also be given to the issue of how to inform people, in particular blind and partially sighted people, that they are travelling from a 'traditional' segregated pedestrian route, into a shared space area, and how to inform them when they are leaving the 'safe zone' onto the shared area.

SPG Implementation Point 14: Shared space

The decluttering and simplification of the street environment are supported. However shared space scheme designs should always take into account the needs of disabled people, creating a vehicle free 'safe zone' and identifiable crossing zones for people to use should they wish. It is therefore important that the design process includes engaging with disabled people to achieve site specific solutions..

Further information: Guidance on shared space

- LTN 1/11 - shared space (www.gov.uk/ government/publications/ shared-space)

- Manual for Streets (www.gov.uk/ government/publications/ manual-for-streets)

- Manual for Streets 2 (www.gov.uk/ government/publications/manual-for-streets-2)

- Inclusive Streets Design Principles, Guide Dogs, 2010 (www.guidedogs.org.uk/ media/1497778/ Inclusive_Streets_ Design_Principles_booklet_ Guide_ Dogs_2010.pdf)

Amenity space

4.2.21 Areas of amenity space which are proposed as part of a development, whether public or private i.e. residents only, should be of a suitably inclusive design to ensure that all people can use and enjoy them.

4.2.22 Step free access should be provided to areas of amenity space and unnecessary changes in level should be avoided as these could form barriers for some people. The areas should be navigable, and not present users with obstacles or potential hazards. It is recommended that seating is provided to these areas, to allow people to sit and enjoy them for longer.

SPG Implementation Point 15: Amenity space

Developers and local planning authorities should ensure that amenity space associated with developments incorporates the standards of accessible and inclusive design. The design of these areas should be suitable for everyone regardless of disability, age or gender.

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23 *Manual for Streets,* Department for Transport, 2007 www. gov.uk/government/publications/manual-for-streets

Play

London Plan Policy 3.6 Children and Young People's Play and Informal Recreation Facilities

Strategic

A   The Mayor and appropriate organisations should ensure that all children and young people have safe access to good quality, well-designed, secure and stimulating play and informal recreation provision, incorporating trees and greenery wherever possible.

Planning decisions

B   Development proposals that include housing should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs. The Mayor's Supplementary Planning Guidance Providing for Children and Young People's Play and Informal Recreation sets out guidance to assist in this process.

LDF preparation

C   Boroughs should:

a   undertake audits of existing play and informal recreation provision and assessments of need in their areas, considering the qualitative, quantitative and accessibility elements of play and informal recreation facilities

b   produce strategies on play and informal recreation supported by LDF policies to improve access, safety and opportunity for all children and young people in their area.

4.2.23   The Play and Informal Recreation SPG[24] supports the implementation of the London Plan Policy 3.6 Children and Young People's Play and Informal Recreation Facilities, and other policies on shaping neighbourhoods (Chapter 7 of the London Plan), in particular Policy 7.1 on lifetime neighbourhoods.

4.2.24   The SPG identifies that children and young people need free, inclusive, accessible and safe spaces offering high-quality play and informal recreation opportunities in child-friendly neighbourhood environments. Policy 3.6 of the London Plan seeks to ensure that all children and young people have access to such provision.

Further information: Extract from Play and Informal Recreation SPG

Disabled children and young people have the right to play and be included in their local communities but this will only be achieved if the barriers to accessible play are identified and overcome. The guidance "Playing Outdoors? Disabled children's views of play pathfinder and playbuilder play spaces provides an overview of disabled children's perceptions of play spaces. It identifies access into and around play spaces as one of the most significant barriers that excludes disabled children from play spaces. The existence of steps, the lack of dropped kerbs and associated tactile paving or wide smooth level paths around and to play equipment, the lack of accessible toilets and the lack of parking often prevents disabled children and their families from getting into and using play spaces.[1]

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1   *Playing Outdoors? Disabled children's views of play pathfinder and playbuilder play spaces, An overview of KIDS research,* KIDS, 2010

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24 www.london.gov.uk/priorities/planning/publications/ shaping-neighbourhoods-play-and-informal-recreation-spg

Implementation Point 4 from the Play and Informal Recreation SPG

To ensure that all play spaces and routes to play spaces are accessible to and usable by disabled children and disabled parents, boroughs should be actively identifying and addressing the shortage of play provision for disabled children in their areas. New proposals should provide inclusive play space and equipment by meeting the highest standards of accessible and inclusive design.

4.2.25 Inclusive Play is a range of flexible, formal and informal spaces that will attract children to play, young people to meet with friends and adults, and older people to engage in physical activities. The integration of the play spaces into the wider public realm seeks will offer a diverse experience within the landscape, encouraging an inclusive social mix.

An outdoor gym

4.2.26 ILC-UK and Age UK identify in their report 'Making our Communities Ready for Ageing'[25] that in many cases the changes that will support older people in outdoor natural space are those that will benefit all generations: toilets, catering facilities and equipment such as outdoor gyms, which have the potential to be an all-age resource, bringing playfulness into activity. They also recommend that local authorities should support provision of desegregated apparatus for fun in outdoor spaces that includes people of all ages – like swings outside of children's play areas, and outdoor gyms to encourage older people to become more active.

4.2.27 Where play spaces are proposed as part of a wider development, or as a stand alone development, it should be illustrated, both on plan and in the design and access statement, how the highest standards of accessible and inclusive design will be met. Consideration should be given to:

· routes to the spaces/ facilities from the wider area including local housing, nearby public transport and other facilities, and how accessible these routes are;

· location of nearby disabled persons parking bays;

· the availability of public toilets, including accessible public toilets and changing places facilities in the area;

· equipment and play opportunities should be exciting and fun for all children and older people, with various levels of challenge offered;

· the inclusion of equipment that can be used in different ways by children at different stages of development and with differing levels of

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25 *Making Communities Ready for Ageing A call to action,* ILC-UK and Age UK, 2014

Case study 10: Accessible Play Facilities, Broadwater Farm

The Broadwater Farm Children's Centre provides child and family health services, a place to play and learn, opportunity to meet with other families and carers, access to family support services and help for those who want to volunteer in the community.

The whole building is designed to be accessible to children with physical and learning disabilities. Considerable provision was made for the storage of mobility aids and other equipment, while the multimedia sensory room offers a welcoming and stimulating environment that is used by all the children.

The Centre was originally conceived as part of the ongoing regeneration of the surrounding estate. The design was developed in close dialogue with local residents. These discussions not only allowed residents to see and comment upon the emerging design, but also had tangible results. For example, the green roof was informed by conversations with residents in the adjacent tower blocks and their wish to look down upon something more 'natural' in appearance than a conventional roof.

As the brief was developed, the building evolved to become a full-scale Children's Centre, open all year round, accessible for disabled children, and providing a wide range of facilities to the local community.

In reviewing the scheme Commission for Architecture and the Built Environment noted that the staff readily acknowledge and appreciate the difference that the new building has made to their work, while the Centre has also been popular with local residents, parents, and – most importantly – children.

© Gollifer Langston Architects

ability, including children who are wheelchair users, are recommended;

- the inclusion of observation points, where parents or carers can observe their children without being involved in play activities;

- whether the area is easily accessible for disabled parents, including family facilities such as accessible baby changing facilities;

- free-play areas with boundary fencing.

4.2.28 Where gates are provided to keep the area dog free this should be with the exception of registered assistance dogs.

4.2.29 The Play and Informal Recreation SPG identifies the importance of play space to ensure a child friendly city. It also notes that the creative use of the public realm can be used and that Play Streets and other highway measures such as car parking located away from public spaces to create playable space in street and other public spaces can improve the environment/public realm for children.[26]

4.2.30 Boroughs are encouraged to work with local communities to improve existing facilities and to support the creation and use of new space. Further guidance is provided in Chapter Five of the Play and Informal Recreation SPG.

SPG Implementation Point 16: Inclusive play

To ensure that all play spaces and routes to play spaces are accessible and inclusive, boroughs should be actively identifying and addressing the shortage of play/activity provision for disabled children and older Londoners in their areas. New proposals should provide inclusive play/amenity space and equipment by meeting the highest standards of accessible and inclusive design.

Further Information: "Plan Inclusive Play": assessing inclusive play for children

Inclusive Play (www.inclusiveplay.com/) has worked with KIDS The Disability Children's Charity (www.kids.org.uk/) to create and developed a new play area assessment tool "Plan Inclusive Play" (PIP). The purpose of PIP is to help Local Authorities, Landscape Architects, Planners as well as families with disabled children to create inclusive outdoor play areas as well as assessing installed play areas.

PiP is essentially a checklist for anyone assessing a planned or existing play provision. The questions can be worked through on the online form which is then available for you to print out and will also be submitted to inclusive play.

The checklist can be accessed at www.inclusiveplay.com/pip-assessment/

4.3 Transport, parking, cycling, and walking

Extract from London Plan Policy Integrating transport and development: 6.1 Strategic Approach

Strategic

A The Mayor will work with all relevant partners to encourage the closer integration of transport and development through the schemes and proposals shown in Table 6.1 and by:

b seeking to improve the capacity and accessibility of public transport, walking and cycling, particularly in areas of greatest demand – boroughs should use the standards set out in Table 6.3 in the Parking Addendum to

26 *Shaping Neighbourhoods: Play and Informal Recreation SPG,* GLA, 2012 page 32 Playable space in a child friendly city

set minimum cycle parking standards in DPDs

c   supporting development that generates high levels of trips at locations with high levels of public transport accessibility and/or capacity, either currently or via committed, funded improvements including, where appropriate, those provided by developers through the use of planning obligations (See Policy 8.2).

d   improving interchange between different forms of transport, particularly around major rail and Underground stations, especially where this will enhance connectivity in outer London (see Policy 2.3)

i   promoting walking by ensuring an improved urban realm

j   seeking to ensure that all parts of the public transport network can be used safely, easily and with dignity by all Londoners, including by securing step-free access where this is appropriate and practicable.

B   The Mayor will, and boroughs should, take an approach to the management of streetspace that takes account of the different roles of roads for neighbourhoods and road users in ways that support the policies in this Plan promoting public transport and other sustainable means of transport (including policies 6.2, 6.7, 6.9 and 6.10) and a high quality public realm. Where appropriate, a corridor-based approach should be taken to ensure the needs of street users and improvements to the public realm are co-ordinated.

Public transport

4.3.1   The introduction of low-floor buses and the installation of lifts at many underground stations, and the significant improvements in terms of inclusive access achieved as part of the London 2012 Games, have improved access to public transport for many people. However not all Londoners, particularly disabled and older Londoners and parents with small children are able to take full advantage of the benefits the city offers. The physical accessibility of the transport network can limit the journey opportunities for some people whose only option is to take accessible but longer routes.

4.3.2   Currently 66 out of the 253 underground stations owned by Transport for London and 40 of the 83 stations served by London Overground currently provide step free access.

4.3.3   The Mayor is committed to making public transport and the pedestrian environment more accessible for everyone. Removing physical, attitudinal and communication barriers, and building in accessibility for all should be a standard requirement of all development proposals. The Mayor's Transport Strategy[27] provides details of future improvements to the public transport system in London for example underground station and interchange improvements, step free access at stations, improvements via the Department for Transports 'Access for all'[28] scheme and Crossrail.

4.3.4   The Mayor has made it clear that all new transport infrastructure, including stations, must be fully accessible for all, regardless of disability, age or gender, in order to provide benefits to as wide a range of travellers as possible.

27 *Mayor's Transport Strategy,* GLA, 2010 www.london.gov.uk/priorities/transport/publications/mayors

28 www.gov.uk/government/collections/access-for-all-programme

4.3.5   The Mayor, through TfL, and working with the DfT, Network Rail, train operating companies, London boroughs and other stakeholders, will seek to increase accessibility for all Londoners by promoting measures to improve the accessibility of the transport system, including streets, bus stops, stations and vehicles.

4.3.6   Large scale accessibility improvements on the public transport, such as step-free access to underground stations, are generally funded directly by DfT/TfL, rather than s106 funding, primarily due to cost. Step free access to stations can cost millions of pounds and as such generally only the largest developments can fund them. However many developments can fund smaller scale improvements, for example local bus stop accessibility improvements and routes (in accordance with London Plan Policy 6.7). This should be looked at as part of the transport assessment and funded through a s106 agreement if appropriate.

Croydon Tramlink

SPG Implementation Point 17: Public transport

The Mayor will and boroughs should encourage applicants for any development that effects existing or provides new public transport facilities, stations or interchanges, to exceed the minimum standards of access and aim to achieve the highest standards of safe, easy and inclusive access for all, including securing step-free access to existing facilities where this is appropriate and practicable. Transport modes should be integrated in a fully inclusive way.

Parking

Extracts from London Plan Policy 6.13 Parking

Strategic

A   The Mayor wishes to see an appropriate balance being struck between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use.

B   The Mayor supports Park and Ride schemes in outer London where it can be demonstrated they will lead to overall reductions in congestion, journey times and vehicle kilometres.

Planning decisions

D   In addition, developments must:

    a   ensure that 1 in 5 spaces (both active and passive) provide an electrical charging point to encourage the uptake of electric vehicles

    b   provide parking for disabled people in line with Table 6.2

LDF preparation

E   b   in locations with high public transport accessibility, car-free developments should be promoted (while still providing for disabled people)

    c   in town centres where there are identified issues of vitality and viability, the need to regenerate such centres may require a more flexible approach to the provision of public car parking to serve the town centre as a whole

    d   Outer London boroughs wishing to promote a more generous standard for office developments would need to demonstrate in a DPD

        –   a commitment to provide space for electric and car club vehicles, bicycles and parking for disabled people above the minimum thresholds.

4.3.7   In 2006 the Greater London Authority published the research report 'Blue badge parking standards for off street car parking'.[29] This report raised many issues regarding blue badge parking across London, which have been addressed by the 2011 London Plan policy, the Mayor's Transport Strategy and this SPG. The following text from the report highlights the need for blue badge parking.

Further information: Extract from 'Blue badge parking standards for off street car parking'

Although considerable progress has been made over the last five years in relation to making mainstream public transport accessible to disabled people, many people still need to use cars because of continuing lack of access to the underground network.

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29   *Blue badge parking standards for off-street car parking,* GLA, 2006

There are some disabled people who will experience barriers to using public transport all or some of the time even if it is accessible, for example:

- In inclement weather
- When routes to the access points are temporarily blocked e.g. by parked cars
- If their journey will be unreasonably long or involve multiple changes (this increases the risk of experiencing equipment failure e.g. ramps on buses, lifts in stations)
- When there is overcrowding

Finally, sometimes disabled people need to use their cars, like other people do, to carry families, or shopping, or just to get from A to B. The provision of parking concessions through the Blue Badge scheme removes those barriers for disabled people who have access to a car.

However, when disabled people use their cars, parking provision can present another barrier. Some may need parking close to a building entrance (because public transport is not accessible to them and they are unable to walk or wheel far); some may need parking (because public transport is not accessible to them) but can wheel a significant distance to an entrance (such as an electric wheelchair user).

4.3.8   Designated parking bays are still therefore essential for some users hence London Plan policy:

London Plan Policy: Extract From London Plan Chapter 6

6.44   The policy recognises that developments should always include parking provision for disabled people. Despite improvements to public transport, some disabled people require the use of private cars. Suitably designed and located designated car parking and drop-

off points are therefore required. Boroughs should take into account local issues and estimates of local demand in setting appropriate standards and should develop monitoring and enforcement strategies to prevent misuse of spaces. Applicants for planning permission should use their transport assessment and access statement to demonstrate how the needs of disabled people have been addressed.

4.3.9   Some confusion exists with the term 'accessibility' when discussing transport, as the following text from the blue badge parking report illustrates[30]:

Further information: Extract from 'Blue badge parking standards for off street car parking'

The Public Transport Accessibility Level (PTAL) methodology is increasingly being used by transport planners to assess the accessibility of a proposed development and identify the appropriate level of car parking spaces. The results are then included within transport assessments. The PTAL methodology does not take account of inaccessible underground or rail stations or other barriers to movement. As a result, there is a need to consider accessibility for disabled people within the context of the Social Model of Disability as part of transport assessments.

4.3.10   PTAL assessments do not take into account accessibility in terms of access for disabled people. The London Plan therefore states that blue badge parking should be provided even if no general parking is provided. The following guidance is provided in the London plan regarding parking for blue badge holders:

30 Blue badge parking standards for off-street car parking, GLA, 2006

6A. 2 Developments should provide at least one accessible on or off street car parking bay designated for Blue Badge holders, even if no general parking is provided. Any development providing off-street parking should provide at least two bays designated for Blue Badge holders. BS 8300:2009 provides advice on the number of designated off street parking bays for disabled people for different building types as shown in the table below. As these standards are based on a percentage of the total number of parking bays careful assessment will be needed in locations where maximum parking standards are reached to ensure that these percentages make adequate provision for disabled people. The appropriate number will vary with the size, nature and location of the development, the levels of on and off street parking and the accessibility of the local area. However, designated parking spaces should be provided for each disabled employee and for other disabled people visiting the building.

6A.3 The provision of bays should be regularly monitored and reviewed to ensure the level is adequate and that enforcement is effective. Spaces designated for use by disabled people should be located on firm level ground and as close as feasible to the accessible entrance to the building. Further details on parking for disabled people will be provided in the updated supplementary guidance on achieving an inclusive environment.

4.3.11   BS 8300:2009+A1 2010, 4.2.1.3 recommends that hotels should have at least one designated disabled persons car parking space per accessible bedroom and notes that the numbers of designated spaces might need to be greater at venues that specialise in accommodating groups of disabled people. Where this is not provided the Access Management Plan (see Appendix 9) should address car parking provision for disabled guests, see also Implementation Point 20.

Design of designated disabled persons parking bays

4.3.12   Designated disabled persons parking bays are for the exclusive use of vehicles displaying a disabled person's parking badge (e.g. blue badge)[31]. As stated above, designated parking bays should measure 2.4m wide by 4.8m long, and incorporate a zone (at the same level as the bay) 1.2m wide between bays and to the rear of the bay. The hatched areas to the rear and side of the bay should not intrude out into the roadway or vehicle circulation route as this area is designed in enable a disabled driver or passenger to get in or out of a vehicle safely and access the boot or rear hoist as detailed in BS 8300:2009 + A1 2010, 4.2.3.

4.3.13   To avoid disabled motorists being denied the opportunity to run electric cars a percentage of disabled persons parking bays should offer either active or passive charging points, in line with TfL requirements.[32]

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31   *BS 8300:2009 + A1 2010* Commentary on Clause 4

32   www.tfl.gov.uk/info-for/urban-planning-and-construction/ transport-assessment-guide/guidance-by-transport-type/ electric-vehicle-charging-points

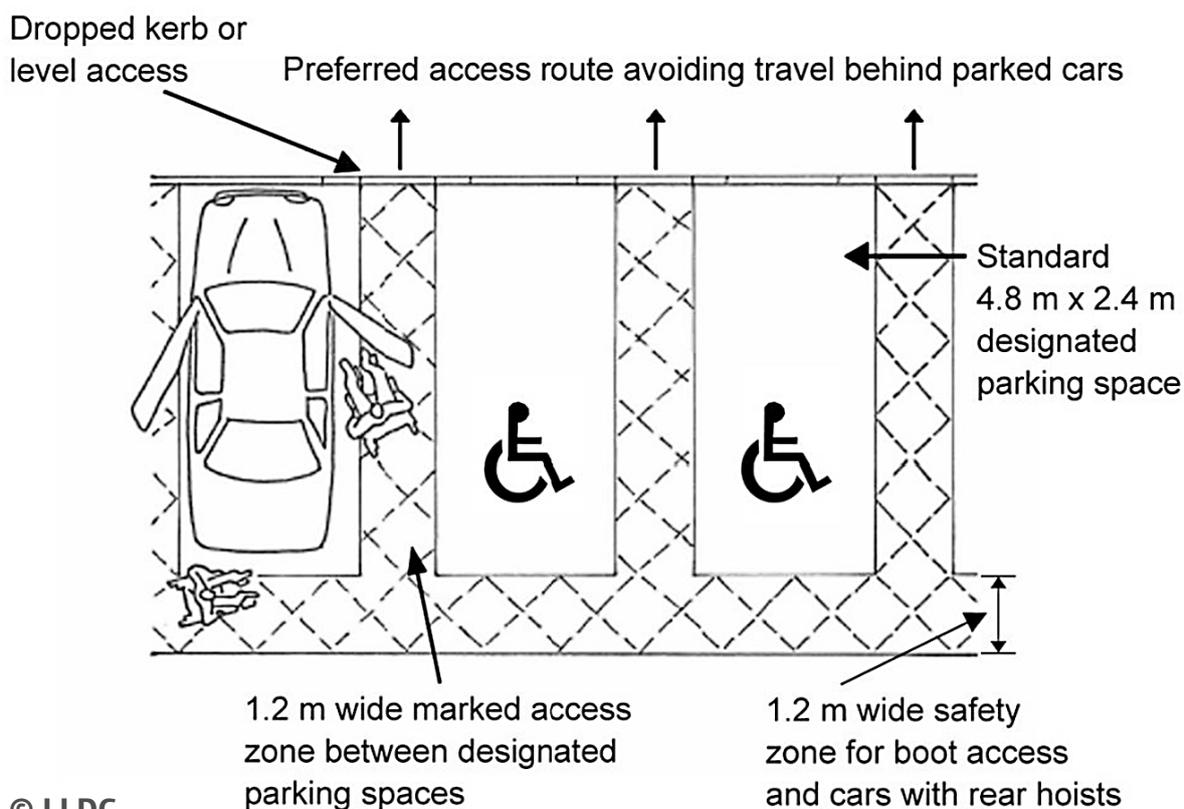**London Plan Policy:Table 6.2 Car parking standards**

Designated Blue Badge parking bays recommended in BS 8300:2009			
Building Type	Provision from the outset		Future provision
	number of spaces* for each employee who is a disabled motorist	number of spaces* for visiting disabled motorists	number of enlarged standard spaces**
workplaces	one space	5% of the total capacity	a further 5% of the total capacity
shopping, recreation and leisure facilities	one space	6% of the total capacity	a further 4% of the total capacity
railway buildings	one space	5% of the total capacity	a further 5% of the total capacity
religious buildings and crematoria	two spaces or 6% whichever is the greater.		a further 4% of the total capacity
sports facilities	determined according to the usage of the sports facility***		

*   Parking spaces designated for use by disabled people should be 2.4m wide by 4.8m long with a zone 1.2m wide provided between designated spaces and at the rear outside the traffic zone, to enable a disabled driver or passenger to get in or out of a vehicle and access the boot safely.

**   Enlarged standard spaces 3.6m wide by 6m long that can be adapted to be parking spaces designated for use by disabled people to reflect changes in local population needs and allow for flexibility of provision in the future.

***   Further detailed guidance on parking provision for sports facilities can be found in the Sport England publication Accessible Sports Facilities 2010

Further information: Designated disabled persons parking bay layout

Dropped kerb or level access

Preferred access route avoiding travel behind parked cars

Standard 4.8 m x 2.4 m designated parking space

1.2 m wide marked access zone between designated parking spaces

1.2 m wide safety zone for boot access and cars with rear hoists

© LLDC

4.3.14 BS 9266[33] identifies that small proportion of wheelchair users have high-top conversion vehicles which can require a vertical clearance of at least 2.6m from the carriageway. This vertical clearance may not be required to all designated bays but consideration should be given to providing some designated bays which achieve this.

4.3.15 The 2006 GLA blue badge parking study[34] also provided the following guidance on floor to ceiling height clearance for designated parking bays. The reference to BS 8300 (2001) has been superseded by BS 8300:2009 + A1: 2010, with paragraph 4.4.3 retained.

Further information: Extract from "Blue badge parking standards for off street car parking"

Height Restrictions

5.10 The Institution of Structural Engineers (2002)[20] recommended that the minimum clear height or headroom for vehicles in multi-storey or underground car parks should be 2.10m. British Standard BS 8300 (2001)[3] recommends that any vehicle height barrier should provide clearance of 2.6m from the carriageway to allow the passage of a high-top conversion vehicle. The vertical clearance should be maintained from the entrance to the car park to the designated parking spaces and to the exit. Some disabled motorists use vans or high-top cars, others use cars with their wheelchair

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33 BS 9266:2013: Design of accessible and adaptable general needs housing – Code of practice, BSI 2013

34 Blue badge parking standards for off-street car parking, page 28

stowed on top of the vehicle, so height can be critical.

5.11 It is therefore essential that the maximum acceptable height of a vehicle is shown on the approach to the car park so that the driver has time to avoid entering the car park and avoid being locked in a queue from which they cannot escape.

4.3.16 Where this vertical clearance is considered to be unfeasible and the car park is not also to be used by public visitors the case for a reduced clearance, with alternative options, should be made within the design and access statement.

SPG implementation Point 18: Non-residential disabled persons parking

In the case of non-residential development, the developers and boroughs should seek to ensure adequate disabled persons parking provision is made, to ensure the best possible parking solutions for blue badge holders Parking provision should be in accordance with Policy 6.13 and Table 6.2 of the London Plan.

4.3.17 The London Plan does not cover specific levels of provision of motor-cycle parking for commercial developments, however it should be noted that growing number of disabled people use motor cycles as a mode of transport. Some parking needed by disabled people inhibited from full use of transport networks could take the form of motor-cycle parking.

Residential Parking Standards

4.3.18 The London Plan requires 10% of all new homes to be wheelchair accessible or easily adaptable for occupation by a wheelchair user[35] (see section 4.4 of

this SPG). This policy references the 'Wheelchair Housing Design Guide'[36] (WHDG) which requires one parking bay for every wheelchair accessible or easily adaptable home (so 10% of the total number of residential units). Any residential development, even when car free, should comply with London Plan Policy 3.8 and provide adequate parking for the wheelchair accessible or easily adaptable units, preferably on-site.

4.3.19 The WHDG also notes that grouped car parking serving multi-storey or high-density developments can be provided on the basis of management arrangements. This could provide at least one designated wheelchair space per wheelchair user dwelling if required. These spaces, whether off street or kerbside, should be of the required size to enable transfer between the car and an adjacent pavement or hardstanding.[37]

4.3.20 If the full complement of designated bays is not provided at first occupation, a parking management strategy (to be approved at planning application stage) should set out what mechanisms will be used to ensure that additional provision can be made quickly and easily. This may mean managing bays through leasing arrangements so that they can be assigned to Blue Badge holders as necessary, reflecting the actual demand or identifying additional off-site capacity.

4.3.21 On major developments with easy access to step free public transport and that have a significant number of wheelchair accessible /adaptable units boroughs should consider a flexible approaches to the provision associated parking bays and other mitigation measures. This could take the form of the delivery of conveniently located on street bays

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35 London Plan Policy 3.8 Housing Choice

36 *Wheelchair Housing Design Guide, second edition,* Habinteg Housing Association, 2006

37 *Wheelchair Housing Design Guide, second edition,* para 3.1.6

(through a s106 agreement) that can be taken in and out of use depending on the demand at any point in time, access to a car club and facilities for the storage and charging of mobility scooters and improvements to local bus tops, including the provision of raised kerbs to facilitate bus-ramps.

4.3.22 Lifetime Home Standards[38] recommends that, in addition to those bays needed for residents of the wheelchair accessible properties, at least one designated bay should be provided beside each lift core/block entrance. This requirement is also stated in the GLA's Housing SPG.

4.3.23 Lifetime Homes standards and the GLA's Housing SPG Quality and Design Standards also require that where car parking is within the dwelling plot, at least one car parking space should be capable of enlargement to a width of 3300mm. Where parking is provided in communal bays, at least one space with a width of 3300mm should be provided per block entrance or access core in addition to spaces designated for wheelchair user dwellings.

future supply and demand. If submitting a planning application, applicants should commit in their design and access statement to regularly monitor and review designated parking provision, to ensure that the provision equates to the demand from disabled users, visitors and (where applicable) residents, and that they bays are effectively enforced. This should allow for changing circumstances over time, particularly in residential developments, as not all residents in wheelchair accessible homes will require the use of a designated parking bay when they first move in. The important issue at planning stage is that the applicant can demonstrate that it is physically possible for the above provision to be made if needed at a later date. In addition provision will be effectively managed to ensure that disabled and older people are provided with designated bays when required and are not prevented from living in or visiting the development due to a lack of suitable parking.

SPG implementation Point 20: Parking enforcement

To ensure that provision equates to demand from disabled users (including allocation of bays to wheelchair accessible residential units) and that disabled persons parking bays are effectively enforced:

- applicants should identify how they will monitor and review parking provision for disabled persons in their car parking management strategy;

- boroughs are encouraged to address this in any planning conditions and s106 agreements relating to car parking management.

SPG Implementation Point 19: Residential parking

To ensure the residential developments are in accordance with London Policy 3.8 developers and boroughs should ensure that the design of parking bays are in accordance with the requirements of the GLA's Housing SPG in terms of Lifetime Homes standards and Wheelchair Accessible Housing requirements.

Monitoring and enforcement of designated disabled persons parking

4.3.24 The monitoring and enforcement of designated parking bays is an essential consideration when planning car parking arrangements, as is the management of

38 *Lifetime Home Standards,* Habinteg Housing Association, 2010

Cycling

4.3.25 The Mayor is committed to delivering a step-change in cycling provision that will support the growing numbers of cyclists in central London as well as encourage growth in cycling across all of London. As the Mayor's Vision for London's Cycling improves the physical cycling landscape of London, it is critical that the needs of disabled cyclists and all other non-standard cycle users are considered within cycle infrastructure design.

4.3.26 According to TfL research, whilst 22% of non-disabled people regularly cycle for transport, only 9% of disabled people do so.[39] Currently, cycling accounts for only 1% of all journeys amongst people aged 65 and older in the UK compared to 23% in the Netherlands, 15% in Denmark and 9% in Germany.[40]

© Wheels for Wellbeing

4.3.27 An inclusive approach to cycling needs to accommodate a wide range of cycle types and to not exclude or disadvantage their riders. This includes people with physical, sensory and cognitive impairments who use handcycles, tricycles (both upright and recumbent), tandems, solo bikes with or without adaptations to suit the rider's specific needs (e.g. one handed brakes, crutch holders, and power assisted) and cargo bikes and bikes with trailers used by parents with children.

SPG Implementation Point 21: Inclusive cycling

Boroughs and developers should seek to encourage inclusive cycling thorough:

· considering the spatial requirements of inclusive cycles and tricycles with the design of cycle infrastructure routes;

· providing an element of secure parking suitable for inclusive cycles, cargo cycles and tricycles, within general cycle parking, that is accessed via a step-free route.

Further Information: Inclusive cycling guidance

· Where cycle parking is provided within a building, doorways and lifts need to be large enough to accommodate non-standard cycles when not provided on the ground floor (see the London Cycling Standards).

· Cycle storage should be provided for larger inclusive cycles, trikes and cargo bike securing systems or reserved cycle lockers to the right dimensions should be considered. Some riders will find it difficult to bend/balance around their cycle whilst securing it and as such

39 *Understanding the travel needs of London's diverse communities - Disabled People , TfL 2012*
40 *CycleBOOM, 2014, www.cycleboom.org/*

additional space for moving around the cycle whilst parking it is critical.

- In designing cycle routes consider width, camber and gradient, spatial requirements of inclusive cycles and tricycles with the design of cycle infrastructure. This includes suitably wide cycle lanes and tracks, avoiding narrow gaps that will exclude wider cycles, maintaining good surface quality, avoiding speed humps and cushions that are not cycle-friendly and providing level transitions between facilities such as dropped kerbs in accordance with London Cycling Design Standards.

Walking

London Plan Policy 6.10 Walking

Strategic

A   The Mayor will work with all relevant partners to bring about a significant increase in walking in London, by emphasizing the quality of the pedestrian and street environment, including the use of shared space principles – promoting simplified streetscape, decluttering and access for all.

Planning decisions

B   Development proposals should ensure high quality pedestrian environments and emphasise the quality of the pedestrian and street space.

LDF preparation

C   DPDs should:

a   identify, promote and complete the relevant sections of the strategic walking routes shown on Map 6.3, as well as borough routes

b   identify and implement accessible, safe and convenient direct routes to town centres, transport nodes and other key uses

c   promote the 'Legible London' initiative to improve pedestrian wayfinding

d   provide for the undertaking of audits to ensure that the existing pedestrian infrastructure is suitable for its proposed use

e   encourage a higher quality pedestrian and street environment, including the use of shared space principles, as such simplified streetscape, decluttering, and access for all

4.3.28   Policy 6.10 Walking highlights the importance of, and the Mayor's commitment to providing a good quality and safe pedestrian environment within London. To this end, the quality and safety of London's pedestrian environment should be improved to make the experience of walking more pleasant and increasingly viable alternative to the private car. By providing safe and attractive routes that are easy to navigate people will be encouraged to walk more, which will have safety, economic and health benefits for them and also help tackle climate change and support the viability of town centres.

4.3.29   Planning briefs and masterplans should include means of encouraging high quality, connected pedestrian environments to be addressed in development proposals, to ensure that walking is promoted and that street conditions, especially safety, security and accessibility for disabled people, are enhanced.[41]

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41   London Plan 2011 paragraph 6.38

4.3.30 Walking routes should therefore be welcoming to all, should not present barriers to their use, and be clear and navigable. Issues to consider when assessing the suitability of walking routes include:

- has an access audit, in addition to a pedestrian environment review (PERS) audit[42], been carried out to identify existing levels of accessibility in terms of inclusive design, this should take on board the user experience of different times of the day and week;

- distance between proposed resting places;

- suitability of the route in terms of width, gradient;

- is the route adequately lit

- how direct the route is;

- how legible the route is;

- whether the area features Legible London[43];

- how navigable the route is for blind and partially sighted people i.e. does it have clear 'shore lines' (which can be building or kerb lines) for someone to follow;

- are suitably designed and located dropped kerbs provided, and do they display correctly positioned tactile paving

- are cycle and vehicle routes clearly defined for walkers;

- is there a potential conflict between pedestrians, cyclists and vehicles to the route free of unnecessary clutter that could be barrier to disabled people (see Implementation Point 14 of this SPG).

4.3.31 The PERS audits should identify whether the existing pedestrian infrastructure is suitable for its proposed use and that new development improves pedestrian amenity. Pedestrian amenity encompasses a range of factors that, in combination, support environments that encourage more walking. These amenity factors include safety, attractiveness, convenience, information and accessibility.

4.3.32 Further guidance on shared space principles and areas of public realm can be found in section 4.2 of this SPG.

SPG implementation point 22: Walking

Boroughs are encouraged to identify key pedestrian routes connecting major land uses, transport nodes and services and to assess whether these routes meet the principles of inclusive design through conducting access audits

Boroughs should ensure that development proposals take into account the accessibility of surrounding walking routes in terms of inclusive design and seek to integrate improvements where appropriate.

Olympic Park seating

42 www.tfl.gov.uk/assets/downloads/businessandpartners/what–is–PERS.pdf
43 www.tfl.gov.uk/microsites/legible-london/default.aspx

4.4   Accessible housing

London Plan Policy 3.8 Housing Choice

Strategic

A   Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments.

LDF preparation and planning decisions

B   Taking account of housing requirements identified at regional, sub-regional and local levels, boroughs should work with the Mayor and local communities to identify the range of needs likely to arise within their areas and ensure that:

   a   new developments offer a range of housing choices, in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups and the changing roles of different sectors, including the private rented sector, in meeting these

   b   provision of affordable family housing is addressed as a strategic priority in LDF policies

   c   all new housing is built to 'The Lifetime Homes' standards

   d   ten per cent of new housing is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users

   e   account is taken of the changing age structure of London's population and, in particular, the varied needs of older Londoners, including for supported and affordable provision

   f   account is taken of the needs of particular communities with large families

   g   other supported housing needs are identified authoritatively and co-

ordinated action is taken to address them in LDF and other relevant plans and strategies

   h   strategic and local requirements for student housing meeting a demonstrable need are addressed by working closely with stakeholders in higher and further education and without compromising capacity for conventional homes

   i   the accommodation requirements of gypsies and travellers (including travelling show people) are identified and addressed in line with national policy, in coordination with neighbouring boroughs and districts as appropriate

4.4.1   Many disabled and older people still live in unsuitable housing without access to essential amenities, or must move or undertake expensive adaptations when their needs change. Much of London's housing stock is old and difficult to adapt. The fact that some homes are not physically capable of accommodating the differing requirements of disabled people as residents or visitors, can lead to discrimination and social exclusion.

4.4.2   Many Londoners require accessible housing to lead independent and dignified lives. Around 240,000 households, 8% of all households in London, say that the disability of a household member requires a home adaption. Of these, around 25,000 or just over 10% say they are attempting to move to somewhere more suitable to cope with the disability.[44]

4.4.3   In addition more Londoners are living longer and more older people are choosing to remain in their own homes and need accessible housing to enable

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44 GLA analysis of English Housing Survey 2008/09 to 2011/12.

them to do so.

4.4.4   Housing should be designed so that people can use it safely, easily and with dignity regardless of their age, disability, gender or ethnicity. It should meet inclusive design principles by being responsive, flexible, convenient, accommodating, and welcoming. It should be designed to accommodate and easily adapt to a diverse range of needs. For example, for people who are frail, have a sensory impairment, have learning difficulties, or who have specific bathroom or living space preference connected to personal religious, ethnic or cultural custom or practice. Housing should also support family life, whether in the flexibility and generosity of units for smaller families, or in the provision of larger homes.

4.4.5   Careful planning and generous space standards can occasionally allow the adaptation of a Lifetime Home for use by some wheelchair users, but where homes are designed to the minimum space standards and where occupancy levels will remain the same, homes for wheelchair users need to be larger to provide accessible circulation, space for a variety of mobility equipment, adequate storage within reach in kitchens and bedrooms and to allow convenient and dignified use of bathrooms.

The Mayor's Housing Standards

4.4.6   The Housing Supplementary Planning Guidance provides clear guidance on standards to improve the internal design of new homes with minimum space standards, adequate room sizes and generous levels of usable, integrated storage. It recognises that in higher density development, it is particularly important that internal design is integrated with that of the immediate residential environment, and includes

provision for private amenity space such as balconies which are vital for occupants without gardens. The SPG has reduced the burden on developers by rationalising the number of requirements to which they must refer from more than 300 to ninety.[45]

Housing Standards Review

4.4.7   In March 2014[46] the Government announced its intention to introduce two optional requirements for accessibility in to Part M (Access to and use of buildings) of Schedule 1 of the Building Regulations. Nationally these optional requirements will be available to local planning authorities to use in setting their housing policies, and with particular reference to meeting the current and future housing needs of a wide range of people including older and disabled people.

4.4.8   The Government also announced its intention to take forward the development of a nationally described space standard which will be available to local planning authorities to use in setting their housing policies.

4.4.9   On 12 September 2014[47] the Government launched a further consultation on the optional requirements and the space standards. This consultation is not seeking views on the merits of the approach but on whether the proposed detailed changes correctly deliver that intent.

4.4.10   It is the intention to introduce a three tier standard for accessibility into the Building Regulations, with a mandatory baseline setting minimum requirement for access to and use of buildings (Category 1 – visitable dwellings); an

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45 *Homes for London: The Draft London Housing Strategy,* GLA, 2013

46 www.gov.uk/government/consultations/housing-standards-review-consultation

47 www.gov.uk/government/consultations/housing-standards-review-technical-consultation

intermediate optional requirement for accessible and adaptable homes (Category 2 – accessible and adaptable dwellings); and an optional requirement for wheelchair accessible or adaptable housing (Category 3 – wheelchair user dwellings).

4.4.11. Nationally, the optional requirements will apply only where they are a requirement of a Local Plan, and are set as a condition of planning permission. The Government are minded to ensure they are applied with minimum impact on plan preparation, planning applications and the development process. Therefore they will be putting in place arrangements to ensure a smooth transition to the new policy.

4.4.12. The GLA and DCLG have worked together to ensure that there is common ground between the Government's objectives for its Housing Standards Review and Mayor's, to continue to secure high quality, accessible housing in London. The optional access standards broadly align with Lifetime Home Standards and the Wheelchair Housing Design Guide and the optional space standard with the Mayor's space standards.

4.4.13 The Mayor has therefore confirmed that it is his intention to align the London Plan with the review once the outcome of the review has been implemented. The Mayor hopes that this alignment will be achieved through a minor alteration to the London Plan. As the London Plan forms part of the development plan for an area of London, this should enable the new optional standards to be implemented in London in terms of the Plan's policies.

Lifetime Home Standards

4.4.15 Under the current London Plan Policy all new homes in London should be built to Lifetime Home Standards (LTH). These standards have been taken into account in the Quality and Design standards of the GLA's Housing SPG (Annex 1), a summary of which is included in Appendix 7. The Quality and Design standards should be approached holistically as many that originate from sources other than the Lifetime Homes Standards will also benefit disabled people, for example reasonable minimum space standards, and can help to ensure an inclusive and good quality design solution is achieved.

4.4.16 Design and access statements should include annotated typical flat layouts which demonstrate that each of the LTH standards has been achieved. It is helpful for planners assessing a large number of flat layouts if the layouts clearly identify how each of the criteria have been met

Further information: Lifetime Homes[1]

"Lifetime Homes is a set of principles applied to general needs housing to provide accessible and convenient accommodation for a wide range of the population, from households with young children to older people, and individuals with temporary or permanent physical or sensory impairment."

"The set of principles come together to form the 16 Lifetime Homes design criteria. These focus on areas relating to accessibility on the approach to the home, moving into and around the home, how the household can manage in the home if a temporary disability prevents the use of stairs, and adaptability of the home to cater for changed needs arising from a permanent disability."

1   Foundation for Lifetime Homes and Neighbourhoods, www.lifetimehomes.org.uk

"The design criteria therefore cover needs of both people with and without disabilities – either within the household, or visiting the household, and aim to improve accessibility for a wide cross section of the population – e.g. parents pushing buggies or carrying children and shopping; older people, perhaps beginning to use mobility aids; members of the household temporarily disabled through illness or accident; and members of the household, or visitors, with permanent disabilities. They consider the spatial needs to provide basic accessibility to essential facilities in the property for this wide section of population, either from the outset or by enabling simple cost effective adaptation. The accessibility and adaptability criteria also aim to provide for changing needs within the household or different needs of a new household over the lifetime of the dwelling."

SPG Implementation Point 23: Lifetime Homes

The Mayor will and boroughs should seek to ensure that all residential units in all new housing developments are designed to Lifetime Home Standards (see the Quality and Design Standards of the Housing SPG).

Mobility scooter storage

4.4.17 The inclusion of storage and charging points for mobility scooters may open up a development for people who require the use of these facilities, in particular disabled and older people, removing barriers and ensuring a more inclusive approach to design. This is particularly relevant for schemes that have limited access to easily accessible public transport or where the topography of

Case Study 11: Lifetime Homes Standards

Below is a diagram submitted as part of design and access statement illustrating how the proposals meet the 16 Lifetime Homes criteria. The numbers in the diagram relate to the specific LTH standard. The plan was included with a detailed section indicating how the standards had been addressed.

© Buro Happold

the site and its surrounding area would limit independent access. Paragraph 2.3.6 of the Housing SPG[48] encourages developers and boroughs to make provision, with a charging facility, for mobility scooters.

4.4.18 Research has shown that the vast majority of mobility scooters are designed to be driven through single doors and so can be taken inside blocks of flats and the flats themselves relatively easily. However they typically have very large turning circles with a minimum of 2000mm so that even flats designed to accommodate conventional wheelchairs are unlikely to have sufficient hallway area for turning.[49]

Case Study12: Harman Court

Conversion of a former Community room into a Scooter store for residents.

The Estate management at Harman Court were concerned at the increasing number of mobility scooters on the estate. Primarily it was to do with the health and safety aspects such as risk of fire, parking and trailing cables etc.

Scooter owners had approached the Management to enquire whether a dry, secure storage facility could be provided. This was finally achieved when, following consultation with residents, the Estate's Community room was identified as being suitable for conversion into a scooter store. The room met the criteria of direct access from outside, sufficient internal dimensions and the room was an underused resource.

It was agreed that the space would have an automated door operable by fob and/or keypad, to be fitted with Smoke Detectors and CCTV, have individual power outlets, an Alert Alarm installed and 1m high shelving (to

facilitate transformers). It was also decided that parking bays would be created which in turn would be marked and numbered such that each scooter owner had their own designated parking space.

In determining bay sizes, time was spent measuring various scooter models and it was agreed that dimensions of 1500mm long by 700mm wide as being suitable for general ease of manoeuvrability. Following consultation with scooter users on the estate it was calculated that a transfer width of 500mm wide (along the whole length of the bay) would suffice.

Inside the scooter store the bays are marked and scooter user parks in their allotted space. Each bay has its own designated power outlet and to minimise trailing leads (and to avoid users having to bend down to the floor), a shelf was specified at 1m high on which individual transformers can be placed.

Odhams Walk

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48 *Housing SPG*, GLA, 2013
49 *Turning the Corner: managing the use of mobility vehicles from a housing perspective, Housing LIN Case Study 59*

> **Implementation Point 24: Mobility scooter storage**
>
> Developers are encouraged to provide storage/charging areas for residents within suitably sized communal areas, for example adjacent cycle storage in separately lockable areas.

Parking

4.4.19 The Wheelchair Housing Design Guide (WHDG)[50] and the Housing SPG require that one parking bay is provided for every designated wheelchair accessible home. The Lifetime Homes Standards require one designated parking bay to be provided beside each residential block entrance or lift core in addition to those provided for the wheelchair accessible homes. Where car parking is provided within the dwelling plot, at least one car parking space should be capable of enlargement to a width of 3300mm. Consideration should also be given to providing bays for disabled visitors. Further detail is provided within section 4.3 of this SPG and SPG implementation Point 20 Parking enforcement.

Wheelchair accessible housing

4.4.20 The London Plan seeks to address the current shortage of homes suitable for wheelchair users in London by requiring that ten per cent of all new housing is designed to be wheelchair accessible or easily adaptable for wheelchair users. The Housing SPG has incorporated the design requirements for Wheelchair Accessible Housing into Annex 2 Best Practice Guidance for Wheelchair Accessible Housing, see Appendix 7. The baseline standards in the Housing SPG which incorporate Lifetime Homes criteria also apply to wheelchair accessible homes, unless the requirement under the wheelchair accessible housing guidance is of a higher standard.
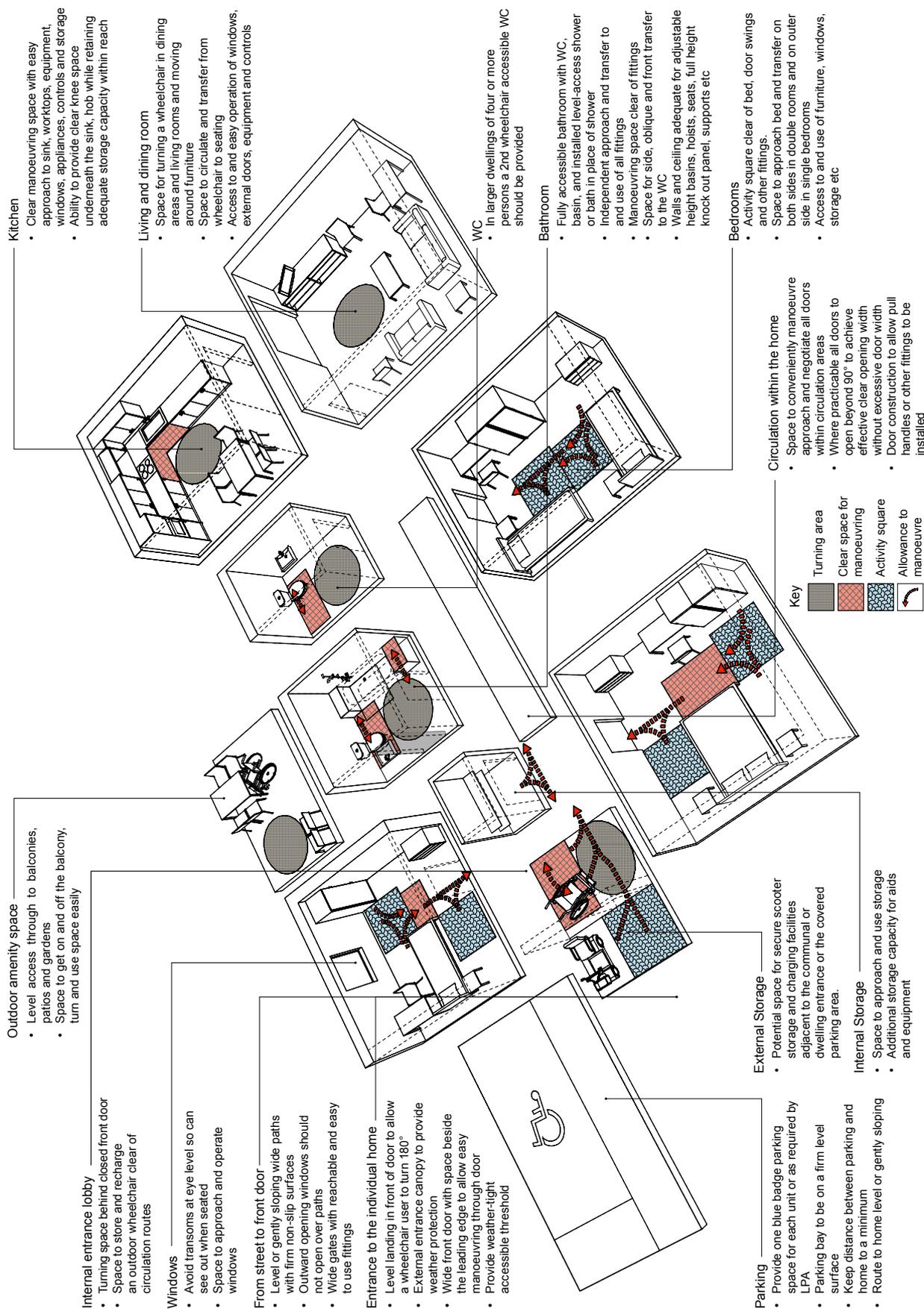
4.4.21 To reflect the principles of inclusive design, homes for wheelchair users should look no different to adjacent homes and be part of, not separate from, the rest of the community. The external environment, pedestrian routes, public spaces and landscaping should also be wheelchair accessible to ensure that disabled people and older people can easily reach their homes, visit their neighbours, and use the communal areas and amenity spaces.

4.4.22 **Easily Adaptable**: Detailed design standards and technical advice are contained in the WHDG. Boroughs should be able to advise on the number of homes that should be fully fitted out as wheelchair accessible homes from the outset (this could include through-floor lifts, accessible kitchen units, level access showers and grab rails). Where the home is not to be fully fitted out or where the first occupants are unknown, the home should be designed to be easily adaptable for future occupation by a wheelchair user i.e. the home is designed from the outset with suitable accessibility, storage capacity, refuse storage, approach space to facilities and furniture, and circulation as defined by the WHDG. This will then enable later minor alterations to be easily undertaken to suit individual needs. "Easily adaptable" should not require expensive or disruptive alterations or substantial adaptations (such as removing structural or non-structural walls to enlarge rooms) to make it suitable for wheelchair users, but might require minor alterations such as installing grab rails, replacing a bath with a shower or changing the kitchen units.

4.4.23 When considering application of London Plan standards in boroughs which already have their own standards, the London Plan standards should be used

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50 *Wheelchair Housing Design Guide, second edition,* Habinteg Housing Association, 2006

Further information: Key features of a home for a wheelchair user

Kitchen
- Clear manoeuvring space with easy approach to sink, worktops, equipment, windows, appliances, controls and storage
- Ability to provide clear knee space underneath the sink, hob while retaining adequate storage capacity within reach

Living and dining room
- Space for turning a wheelchair in dining areas and living rooms and moving around furniture
- Space to circulate and transfer from wheelchair to seating
- Access to and easy operation of windows, external doors, equipment and controls

WC
- In larger dwellings of four or more persons a 2nd wheelchair accessible WC should be provided

Bathroom
- Fully accessible bathroom with WC, basin, and installed level-access shower or bath in place of shower
- Independent approach and transfer to and use of all fittings
- Manoeuvring space clear of fittings
- Space for side, oblique and front transfer to the WC
- Walls and ceiling adequate for adjustable height basins, hoists, seats, full height knock out panel, supports etc

Bedrooms
- Activity square clear of bed, door swings and other fittings.
- Space to approach bed and transfer on both sides in double rooms and on outer side in single bedrooms
- Access to and use of furniture, windows, storage etc

Circulation within the home
- Space to conveniently manoeuvre approach and negotiate all doors within circulation areas
- Where practicable all doors to open beyond 90° to achieve effective clear opening width without excessive door width
- Door construction to allow pull handles or other fittings to be installed

Key
- Turning area
- Clear space for manoeuvring
- Activity square
- Allowance to manoeuvre

Internal entrance lobby
- Turning space behind closed front door
- Space to store and recharge an outdoor wheelchair clear of circulation routes

Windows
- Avoid transoms at eye level so can see out when seated
- Outward opening windows should not open over paths
- Space to approach and operate windows

From street to front door
- Level or gently sloping wide paths with firm non-slip surfaces
- Outward opening windows should not open over paths
- Wide gates with reachable and easy to use fittings

Entrance to the individual home
- Level landing in front of door to allow a wheelchair user to turn 180°
- External entrance canopy to provide weather protection
- Wide front door with space beside the leading edge to allow easy manoeuvring through door
- Provide weather-tight accessible threshold

Outdoor amenity space
- Level access through to balconies, patios and gardens
- Space to get on and off the balcony, turn and use space easily

Parking
- Provide one blue badge parking space for each unit or as required by LPA
- Parking bay to be on a firm level surface
- Keep distance between parking and home to a minimum
- Route to home level or gently sloping

External Storage
- Potential space for secure scooter storage and charging facilities adjacent to the communal or dwelling entrance or the covered parking area.

Internal Storage
- Space to approach and use storage
- Additional storage capacity for aids and equipment

as minima. Consideration needs to be given by boroughs to assess the viability of applying these standards that exceed the London Plan standards, recognising that their standards might adversely affect the affordability of the units for wheelchair users or the development as a whole.

4.4.24 **Choice of tenure:** To ensure that disabled people have the same choice and opportunity as non-disabled people, the 10% of homes which are to be wheelchair accessible homes (or easily adaptable) should be distributed across all tenures. They should be evenly distributed throughout the development, providing the same choice in terms of aspect, floor level and block or street, as any other resident. They should also cater for a range of household sizes, ages of residents and for varying family needs. However if the borough, through their Accessible Housing Register work, can advise on the need for a particular size or tenure of wheelchair accessible home this should be prioritised.

4.4.25 **Design considerations**: Appendix 7 provides a checklist of the key design considerations for wheelchair accessible homes. Compliance with these features should be demonstrated in the design and access statement submitted at planning application stage and clearly illustrated on dwelling plans for each type of wheelchair user home. This will confirm that the dwellings have sufficient footprint to provide suitable circulation and storage can be easily and conveniently occupied by a wheelchair user and that equipment and adaptations can be easily undertaken to suit individual needs. Detailed features such as window catches, door handles, mechanical closers and openers, and electrical fixtures and fittings should be addressed at later design stages and fitted to suit individual needs, but

the initial design of the home and any communal areas should ensure that these features can be easily installed when needed. Particular care should be taken in the location of features such as radiators from the outset to ensure they do not impinge on critical circulation space, such as the end of a bed or within the bathroom.

4.4.26 **Accessible Housing Register:** Boroughs should be able to provide authoritative evidence from their housing needs assessments on the need for wheelchair accessible homes. A number of boroughs have now implemented the London Accessible Housing Register categories and have carried out accessibility assessments of their housing stock so should be able to provide up to date advice about the demand for large or small accessible properties (see www. london.gov.uk/ priorities/housing/ housing-need/ lahr). Boroughs are encouraged to assess the supply and availability of existing and new accessible affordable housing to ensure that the disabled people in need of such properties have the opportunities for more tailored accommodation.

4.4.27 **Marketing**: Wheelchair accessible homes should be identified in the marketing arrangements to ensure that not only wheelchair users, but the many older people who would benefit from the flexible and adaptable homes created, are aware of these particular properties. Some boroughs ask for properties to be specifically marketed in the disability press and on accessible property web sites as well as in mainstream advertising.

Case Study 13: Marketing

Accessible Housing Register Categories

AHR categories are a way of advertising properties and hopefully enabling disabled people to make a more informed choice.

After discussions between a London AHR project group member and Share to Buy (at the time North London First Steps/ Metropolitan HA) Share to Buy[1], their website uses the AHR categories when advertising and also in their search criteria. e.g. Category A for fully wheelchair accessible.

Wheelchair Housing

The London Borough of Hammersmith and Fulham policy is to have a condition on planning approvals that:

· wheelchair housing units be pre-marketed only to wheelchair users or older people for 6 months prior to going on the open market;

· wheelchair housing units be marked up in perpetuity on plans/drawings shared with prospective purchasers so they do not disappear if they are not sold to a wheelchair user.

1   www.sharetobuy.com/firststeps, is the home of the Mayor of London's 'First Steps' scheme. It covers all the main affordable home ownership products in London – including shared ownership

SPG Implementation Point 25: Wheelchair accessible housing

To address the current shortage of homes suitable for wheelchair users in London boroughs and developers should seek to ensure that at least 10 per cent of the units are designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users. Such units should be evenly distributed throughout the development to ensure equality of choice for disabled residents.

Housing for older people

Extract from London Plan Policy 3.8 Housing Choice

LDF preparation and planning decisions

e   account is taken of the changing age structure of London's population and, in particular, the varied needs of older Londoners, including for supported and affordable provision

g   other supported housing needs are identified authoritatively and co-ordinated action is taken to address them in LDF and other relevant plans and strategies

4.4.28   The Mayor has identified the growing and changing requirements for housing older people in London as one of the most important emerging planning issues for London. While London is a 'young' city, it is still expected to experience substantial growth in the population of older people[51] this has already begun to emerge as an issue in some boroughs, especially in Outer London.[52] It is anticipated that between 2011 and 2036 'over 65s' could increase by 64% and 'over 90s' could grow in number by 89,000.[53] Not only are the numbers of older people growing, but the average number of years people survive with a disability or long term illness is increasing.

4.4.29   Building supported housing will help to meet the big long-term challenges such as demographic change and the ageing population. Affordable supportive housing is to be designed to be accessible and aid independent living. Housing of this kind will help people receive care and practical help

51   HM Government. Housing Strategy 2011 op cit paras 6.25 - 38
52   *Outer London Commission. Final Report*. GLA, 2010
53   *Draft Further Alterations to the London Plan*, GLA, January 2014

in their own home, reducing the need for them to go into care homes or hospitals. Specially designed housing of this kind can give people the option to downsize from a larger home to a more manageable property designed for their needs.

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Further information: Inclusive Design for Getting Outdoors

"Supported by their environment, most people aged 80+ living in the community can expect to continue to go outdoors daily, engage in a range of activities and maintain quality of life into oldest age."[1]

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1   Inclusive Design for Getting Outdoors, www.idgo.ac.uk

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4.4.30   In the Further Alteration to the London Plan[54] it identifies that boroughs should work proactively with providers of specialist accommodation for older people to identify and bring forward appropriate sites, taking particular account of potential capacity anticipated from housing led, high density, and mixed use redevelopment of town centres. Both should work with registered providers and other relevant partners to support the provision of additional 'intermediate' models of housing as well as good quality care homes. Providing housing in town centres will ensure they are located close to community facilities and third sector networks that support vulnerable older and older disabled people.

4.4.31   In order to widen the choice of residential environments for older people, boroughs should also encourage 'mainstream' housing developers to extend their product range to meet specialist needs. More generally, it is important that viability assessments

take into account the distinct economics of specialist housing and care home provision.

4.4.32   In developing models of specialist provision for older people care it is important that Boroughs and providers engage with residents and future residents. Age UK[55] identify that "it must be a basic principle that listening and responding to the views of residents should be fundamental in shaping what sheltered and retirement housing offers".

4.4.33   Boroughs and providers should also consider specialist options which are culturally suitable for people from particular communities and reflect the local community.

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Further information: Specialist provision for older people

The London Housing Design Guide does not make explicit the expectations of design on specialised and supported housing. The HCA Design and Quality Standards and, more pertinently for older persons housing, the HAPPI report Housing the Aging Population Panel for Innovation. There are also guidelines available with regards to housing for people with dementia and a good bank of knowledge from the Housing LIN, all links are below:

· www.homesandcommunities.co.uk/sites/default/files/ourwork/design_quality_standards.pdf

· www.homesandcommunities.co.uk/ourwork/happi

· www.housinglin.org.uk/Topics/browse/HousingandDementia/Provision/

· www.homesandcommunities.co.uk/non-mainstream-housing-design-guidance

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54   *Draft Further Alterations to the London Plan, 2014,* paragraph 3.50c

55   *Making it Work for Us, A residents' inquiry into sheltered and retirement housing,* Age UK, 2011

SPG Implementation Point 26: Housing for older people

To ensure the varied needs of older Londoners are catered for, boroughs should identify any shortage of specialist provision for older people in all areas and across all tenures and take co-ordinated action to address these shortfalls in their LDFs and other relevant plans and strategies

4.5. Shopping and town centres

Extracts from London Plan Policy 2.15 Town Centres

Strategic

A   The Mayor will, and boroughs and other stakeholder should, co-ordinate the development of London's network of town centres in the context of Map 2.6 and Annex 2 so they provide:

   b   the structure for sustaining and improving a competitive choice of goods and services conveniently accessible to all Londoners, particularly by public transport, cycling and walking

   c   together with local neighbourhoods, the main foci for most Londoners' sense of place and local identity within the capital

Planning decisions

C   Development proposals in town centres should conform with policies 4.7 and 4.8 and:

   e   promote access by public transport, walking and cycling

   f   promote safety, security and lifetime neighbourhoods

   g   contribute towards an enhanced environment, urban greening, public realm and links to green infrastructure

LDF preparation

D   Boroughs should:

   b   in co-ordination with neighbouring authorities, identify other, smaller centres to provide convenient access, especially by foot, to goods and services needed on a day to day basis, develop their role as foci for local neighbourhoods, and relate these centres to the network as a whole to achieve its broader objectives

   e   promote the provision of Shopmobility schemes and other measures to improve access to goods and services for older and disabled Londoners.

4.5.1   Although significant progress has been made in making town centres more accessible, disabled people still remain disproportionately excluded from many shopping activities in certain areas of London and many of London's town centres cannot yet be considered to provide a fully inclusive environment.

4.5.2   The Mayor's Economic Development and Transport strategies reflect the priority he attaches to the rejuvenation of town centres. In outer and inner London, town centres are the most accessible locations on the public transport system and the centres of their communities. They are key locations for a diverse range of activities, including retail, leisure and office space as well as housing, social infrastructure and public open space. They are also key nodes for more effective land use and transport integration, enabling intensification, encouraging walking, cycling and greater use of public transport and fostering social inclusivity, especially for the substantial numbers of London households who do not have access to a car. Improved accessibility, particularly

by public transport, cycling and walking will underpin their contribution to Londoners' quality of life.

4.5.3 The Mayor also anticipates there will be significant redevelopment of medium and large town centres. Higher density developments will be particularly suitable in addressing the growing housing requirements of different types of smaller households including some older Londoners.

4.5.4 Incorporating inclusive design principles is critical for many people, particularly for blind and partially sighted people – a poorly designed external environment, lack of orientation points and wayfinding clues, and the presence of street clutter can create insurmountable barriers. The charity Guide Dogs conduct an annual national 'Street clutter survey'[56] to better understand the problems caused by everyday obstructions and to identify which high streets need to most urgently address the problems of street clutter. Of the town centres and high streets surveyed, the worst performing town centre in their 2012 survey was located in a London borough. The survey produced key recommendations including:

· Avoiding street clutter and only using it where absolutely necessary.

· Positioning street clutter consistently along a pavement leaving an unobstructed pathway for pedestrians which is of a suitable width.

4.5.5 Town centres should also provide a range of civic services and facilities such as accessible public toilets (see Section 4.7), Blue Badge parking bays (see Section 4.3), clear and navigable routes and streets (see Section 4.2) and Shopmobility schemes. (Section 4.6)

4.5.6 Although many shops have been made more accessible as the access requirements of disabled people are better understood, there are still examples of new shop fronts retaining the original single step at the entrance. Boroughs should include policies in their development plans which ensure that all new shop fronts are designed to be fully accessible, for example; shop fronts which have level access, wide, easy to open doors, and suitably designed manifestations on full height glazing.

4.5.7 Further information on Town Centres can be found in the GLA's Town Centres SPG.[57]

Whitechapel Market

56 www.guidedogs.org.uk/supportus/campaigns/streets-ahead/information-for-local-campaigners/street-clutter-survey-2012/

57 www.london.gov.uk/priorities/planning/publications/town-centres-supplementary-planning-guidance-spg

Case Study 14: Leyton Pilot Shop Fronts Project

Waltham Forest Council and the Waltham Forest Business Board, with support from Design for London, commissioned a strategy to enliven its high streets, The High Street Life Strategy. The document presents a comprehensive survey of the high streets up and down the borough and proposes a number of measures designed to support local retailers, enhance the public realm and augment the status of the high street in the eyes of the public.

The High Road Leyton Pilot Shopfront Project is Waltham Forest's first large-scale shopfront project that trials the Council's vision[1]. On a very limited budget, and with the willing participation of dozens of independent shopkeepers, the project team has upgraded the appearance of six contiguous blocks along Leyton High Road.

The project has seen the installation of new shopfronts, public realm improvements, including creating step-free entrances, colourful facades and animated lighting. The overwhelming response to the scheme has been positive, and it has become evident that both the vendors and landowners involved in the scheme have recognised the potential benefits of the shop front improvement scheme. This modest set of interventions has in turn transformed the image of Leyton as a place to shop and live.

This project was supported by the Mayor and the Mayor's design advisory group Design for London[2] who also helped commission Jan Kattein Architects to identify and develop a robust strategy for the high streets and shop fronts in Waltham Forest in supporting business economy and neighbourhood regeneration.

1   www.walthamforest.gov.uk/Pages/Campaigns/betterhighstreets.aspx
2   www.london.gov.uk/priorities/regeneration/shaping-a-better-london/mayors-design-advisory-group

Town Centre Health Checks

4.5.8　An opportunity to collect and monitor the accessibility of town centres is via the Town Centre Health Checks[58]. The Town Centre Health Check success fully creates a comprehensive database of indices showing the vitality and viability of town centres in London and included the following questions relevant to accessibility.

Further information: Town Centre Health Checks database of indices relevant to accessibility

1.7　Civic and community facilities; Total number of a) public toilets, b) wheelchair accessible toilets, c) toilets with baby change, d) changing places toilets, e) community toilet scheme, h) community centres, i) libraries

4.2　Car parking; Total no. of disabled car parking spaces and mobility scooter charging points... and whether there are any charges for Blue Badge parking bays?

4.3　Shopmobility scheme; whether one exists, what days it is open, whether it is open on evenings, the types of facility available and whether it has funding secured for the next five years

4.9　Access audits; has an access audit to assess town centre accessibility for disabled and older people been undertaken?

4.5.9　Boroughs are encouraged to go further than the basic checks listed in the Town Centre Health Checks, to get a comprehensive and accurate picture of their town centres in terms of access and inclusion. This will help to identify potential barriers for disabled and older people in terms of participation

in society and access to social infrastructure, facilities and services, and once identified, introduce measures to overcome and tackle these barriers. Another opportunity is via the town centre training initiative introduced by the Government in September 2013[59] which includes issues such as age friendly cities.

SPG Implementation Point 27: Town centres

All retail developments and proposals in town centres should meet the London Plan standards of accessible and inclusive design, and all new shop fronts should be designed to provide level and inclusive access. Boroughs should ensure that their development plans require this, and developers should adhere to the principles of inclusive design in their proposals.

Initiatives to overcome barriers to access identified in Town Centre Health Checks should be developed in conjunction with Town Centre Managers, Business Improvement Districts and local businesses.

Shopmobility

4.5.10　Boroughs have a major role to play in ensuring that everyone, regardless of disability, age or gender, has access to the borough's shopping centres, high streets and other leisure and community facilities. One way to help ensure easy access to shopping centres and high streets is the provision of Shopmobility schemes. Shopmobility schemes loan or hire out mobility equipment such as manual wheelchairs, powered wheelchairs, and mobility scooters to members of the public who require or would benefit from the use of the equipment. Shopmobility schemes are for many an essential service for getting

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58 www.london.gov.uk/priorities/planning/ publications/2013-london-town-centre-check

59 www.gov.uk/government/news/training-by-local-high-street-experts-to-help-towns-modernise

around town centres not just to the shops but to cultural activities, parks, sport, leisure and community facilities.

4.5.11 Although not a substitute for good access, Shopmobility schemes can help overcome some of the barriers encountered by people when accessing shopping areas and town centres. Shopmobility services also help strengthen the town centre and its businesses by increasing the potential customer spend available. Shopmobility services are run and provided by a range of organisations, including boroughs, charities, shopping/retail developments, and social enterprises. Some schemes are available to anyone visiting the area, however some schemes for example mobile/delivery services are only available to residents of the borough.

4.5.12 All schemes operate slightly differently. Generally people have to register with the organisation to use the scheme, and will be given full training on using the equipment. The length of lease can vary from a couple of hours to a week or more in some cases. Shopmobility services can be used by anyone, young or old (although most schemes have a lower age limit), people with temporary impairments or injuries, long or short term impairments. They are very popular with older people who are still independent and living at home but can no longer walk the distance needed to use the local shopping centre or high street easily.

4.5.13 Shopmobility schemes in London take a variety of forms, including:

- **Fixed unit services** which are often based in shop units, or shopping centre car parks (to be close to blue badge parking). People visit the unit to borrow the equipment they wish to borrow, and return it to this unit at the end of the loan period.

- **Retail development provided schemes**. These are often set up and run by retail centres, for example the Westfield centres and Brent Cross Shopping Centre, and are provided for people visiting that particular retail development, and can often not be taken out of that development.

- **Mobile/ delivery services**, for example ScootAbility. Once people have registered, these can be accessed by phoning up to 'order' the use of equipment; the equipment is then delivered to someone's home. Training is provided, and the equipment is collected from their homes at the end of the loan period. In order to benefit from the loan of a ScootAbility vehicle, the user must have access to a secure store and power supply.

- **Flexible location services**. Some schemes, for example Kensington and Chelsea Shopmobility 'out and about' have a number of locations that equipment can be picked up from and dropped back off at, often different locations within the Borough, on different days of the week.

4.5.14 There are currently 25 Shopmobility schemes within London, the majority of which are in outer London suburban town centres. There is a shortage of schemes in central London. This deficiency, combined with often poor parking provision for disabled people in central London, the lack of accessible public transport and accessible public toilet facilities, all contribute to the exclusion of disabled people from some of London's best known shopping areas. The Table in Appendix 8 maps the existing service distribution through London, by type and whether they are affiliated to the National Federation of Shopmobility.

Map 1: Shopmobilty Schemes in London

London's Shopmobility Schemes

1 Bexley Heath Shopmobility
2 Brent Cross Shopmobility
3 Bromley Shopmobility
4 Camden Shopmobility
5 Croydon Shopmobility
6 Ealing Shopmobility
7 Edmonton Shopmobility
8 Enfield Shopmobility
9 Harrow and Wealdstone Shopmobility
10 Havering Shopmobility:
   • Liberty Shopping Centre
   • Romford the Brewery
11 Hillingdon Shopmobility
12 Hounslow Shopmobility
13 Kensington and Chelsea 'out and about'
14 Kingston upon Thames Shopmobility
15 Lewisham Shopmobility
16 Redbridge Disability Association
17 Sutton Shopmobility
18 Live Ability Waltham Forest
19 Wandsworth Shopmobility
20 Westfield London Shopmobility
21 Westfield Stratford Shopmobility

Mobile Schemes

A Camden Scootability
B Haringey Mobile Unit
C Islington ScootAbility
D Merton ScootAbility

Fixed Schemes
Affiliated scheme
Unaffiliated scheme

Mobile Schemes
Affiliated scheme
Unaffiliated scheme

London borough boundary
Central Activity Zone
Inner / outer London boundary

SPG Implementation Point 28: Shopmobility

To help ensure easy access to shopping centres and high streets, boroughs are encouraged take an active role in promoting, supporting and monitoring existing Shopmobility schemes.

Where appropriate boroughs should seek to secure the establishment of new Shopmobility schemes throughout London's town centres and high streets and the maintenance of existing schemes via conditions and s106 agreements.

Further information:

Shopmobility

Further information is provided by the National Federation of Shopmobility (NFSUK) (www.shopmobilityuk.org), a charity that exists to support and promote its affiliated schemes to existing and potential customers, and encourage the development of new schemes. Shopmobility schemes are 'affiliated' to the National Federation, but there are also other non-affiliated mobility schemes in London that provide a similar service (see Appendix 8 Shopmobility schemes in and around London).

4.6   Access to social infrastructure

London Plan Policy 3.16 Protection and Enhancement of Social Infrastructure

Strategic

A   London requires additional and enhanced social infrastructure provision to meet the needs of its growing and diverse population.

Planning decisions

B   Development proposals which provide high quality social infrastructure will be supported in light of local and strategic needs assessments. Proposals which would result in a loss of social infrastructure in areas of defined need for that type of social infrastructure without realistic proposals for reprovision should be resisted. The suitability of redundant social infrastructure premises for other forms of social infrastructure for which there is a defined need in the locality should be assessed before alternative developments are considered.

C   Facilities should be accessible to all sections of the community (including disabled and older people) and be located within easy reach by walking, cycling and public transport. Wherever possible, the multiple use of premises should be encouraged.

LDF preparation

D   LDFs should provide a framework for collaborative engagement with social infrastructure providers and community organisations:

a   for the regular assessment of the need for social infrastructure at the local and sub-regional levels; and

b   to secure sites for future provision or reorganisation of provision.

Where appropriate, boroughs are encouraged to develop collaborative cross-boundary approaches in the provision and delivery of social infrastructure

E   Boroughs should ensure that adequate social infrastructure provision is made to support new developments. If the current use of a facility is no longer needed, boroughs should take reasonable steps to identify alternative community uses where the needs have been identified. Adequate provision for social infrastructure is particularly important in areas of major new development and regeneration and should be addressed in opportunity area planning frameworks and other relevant area action plans.

F   The Mayor will work with boroughs, relevant social infrastructure providers and the voluntary and community sector as appropriate to extend proposed supplementary guidance on social infrastructure requirements, especially at the sub-regional and Londonwide levels.

4.6.1   London Plan paragraph 3.3 highlights the Mayors commitment to ensuring that London provides equal life chances for everyone, and the reliance this places on appropriate social infrastructure

4.6.2   To ensure equal life changes for all, the correct social infrastructure should also be in place for the population of London. London Plan Policy 3.16 covers the Protection and Enhancement of Social Infrastructure.

4.6.3   Social infrastructure covers a wide range of facilities such as health provision, nurseries, schools, colleges and universities, community, cultural, play, recreation and sports facilities, places of worship, fire stations, policing and other criminal justice or community safety facilities and many other uses

and activities which contribute to making an area more than just a place to live. All of which need to be inclusive and accessible for all people including disabled and older people, to enable them to participate fully in society.

4.6.4   Social infrastructure providers should take account of the level of inclusive access of their catchment area when consider how accessible they are and how easily disabled and older people can access their services.

4.6.5   At a more local level, other facilities may need to be provided, including informal recreation facilities (Policy 3.6 and Section 4.2 of this SPG), as well as public toilets, drinking water fountains and seating.

4.6.6   London Plan paragraph 3.91 also identifies that voluntary and community groups (which includes groups of/ supporting older and disabled Londoners) often find it difficult to find premises suitable for their needs. It goes on to recommend that unused or underused facilities should be brought into use as much as possible to help address their accommodation needs.

SPG Implementation Point 29: Social infrastructure

Boroughs should ensure that adequate social infrastructure provision is made to support new developments and that these are inclusive and accessible for all people including disabled and older people, to enable them to participate fully in society.

Case Study 15: City Bridge Trust accessible and sustainable buildings grants programme

The City Bridge Trust Making London More Inclusive programme (www.citybridgetrust. org.uk/CBT/Grants/index/04MakingLondon MoreInclusive.htm) provides support for the improvement of existing community buildings for London-based voluntary or community group with grants for:

· an independent access audits up to a value of £5,000

· access improvements to existing community buildings, up to a maximum of £100,000 (where total project costs are less than £5m)

The Access and Sustainability Advisory Service (www.cae.org.uk/asas.html) provided by the Centre for Accessible Environments and funded by the Trust supports applicants to these grants,

Applications will normally only be considered where the lease on the building has at least 10 years to run.

4.7 Public toilets

4.7.1 London Plan Policy 7.5 highlights the importance of schemes satisfying local social infrastructure requirements, for example public toilets. Paragraph 2.72 of the London Plan also highlights the importance of these facilities in town centres.

London Plan Policy: paragraph 2.72

"Town centres should also provide a range of civic services and facilities such as accessible public toilets, affordable child care facilities and Shopmobility schemes."

4.7.2 The GLA's Town Centres SPG provides the following background information on public toilets in London:

Further information: Extracts from the Town Centres SPG

The SPG identifies the following issues:

1.5.2f Public toilets - including provision which is inclusive and accessible for the whole community, including older people, disabled people and parents with babies or young children. Stakeholders should:

· take steps to encourage the establishment of public toilets in new town centre developments and encourage businesses located in new developments to make their toilets available to the general public;

· provide separate accessible baby changing facilities and 'Changing Places' toilets in addition to accessible toilets in all town centre locations to ensure accessibility for the whole community.

SPG Implementation 3.3 Access and Inclusion

Boroughs and town centre partners are encouraged to:

c Seek to improve the existing social infrastructure, such a public toilets, that support the town centre, including shortcomings identified in town centre health checks

4.7.3 Boroughs should encourage leisure providers to provide public toilets or improve the accessibility of existing facilities. Boroughs should also monitor the public toilets available within the borough for example, via Town Centre Health Checks.

4.7.4   Development proposals should assess the need for public toilets in the local area and where necessary provide them, particularly if the scheme is significantly adding to the demand on existing facilities.

4.7.5   Disabled people should be able to find and use suitable toilet accommodation no less easily than non-disabled people. The space requirements for suitable toilet accommodation are generally driven by the needs of wheelchair users, although the facilities might also be used by people with other impairments, for example blind and partially sighted people with assistance dogs, or people with other mobility impairments.

4.7.6   A range of public toilets facilities should be provided, suitable for all members of society. These should include:

4.7.7   **Wheelchair accessible toilets:** Ideally these are unisex. Unisex compartments are more easily identified than single-sex compartments and are more likely to be available when needed. In addition if they are located within single-sex facilities, problems can arise when someone needs assistance and the person assisting them is of the opposite sex. If the accessible toilet is the only toilet AD M recommends that it should be of greater width to accommodate a standing height wash basin.

4.7.8   Where there is only one accessible WC in a building, it should be of unisex corner design, suitable for both wheelchair users and other disabled people. Where more than one wheelchair accessible toilet is provided, it is recommended that different options in terms of left and right handed transfer are presented. Further information on the design of these can be found in the British Standard BS 8300:2009 + A1:2010, 12.6.3.1.

4.7.9   At least one unisex accessible WC should be provided at each location where toilet accommodation is provided for the use of customers, employees or visitors. In residential buildings such as hotels and hostels, where no toilet accommodation is provided outside bedrooms, at least one unisex accessible WC should be provided for visitors at entrance level.

4.7.10 Baby changing facilities should be provided in a separate cubicle to wheelchair accessible toilets. Significant waiting times for wheelchair users can arise when baby changing facilities are provided within the wheelchair user accessible toilet. Many disabled people often have no choice but to use the toilet, and facilities not being available can cause significant problems.

4.7.11 **Accessible family facilities:** Where baby changing facilities are provided they should be accessible (but not located within the wheelchair accessible toilet). Guidance on the design of baby changing facilities can be found in BS 8300:2009 + A1:2010, 12.5.

4.7.12 **WC compartment accessible for people with ambulant mobility impairments:** These toilets are not suitable for wheelchair users, but will be suitable for some disabled and older people, as they provide more generous internal dimensions than some standard WC compartments, grab rails and an outward opening door. Further guidance on the design of these facilities can be found in BS 8300:2009 + A1:2010 12.6.3.3.

4.7.13 **Enlarged cubicle:** Based on a WC compartment accessible for people with ambulant mobility impairments, these are suitable for people who require more space, for example parents with a child in a pushchair.

4.7.14 **Changing Places toilets:** Standard wheelchair accessible toilets do not meet the needs of all disabled people or

their assistants. People with profound and multiple impairments, as well as other serious impairments such as spinal injuries, muscular dystrophy, multiple sclerosis or an acquired brain injury, often need extra facilities to allow them to use a toilet comfortably.

4.7.15   Changing Places toilets are different to standard accessible toilets as they have extra features and more space to meet these needs. Without Changing Places toilets many people are limited in terms of how long they can be away from home, or where they can go. The provision of Changing Places toilets can open up new areas and experiences for people with profound and multiple impairments and their assistants, removing the barrier that the lack of provision of these facilities can create.

4.7.16   The following list is taken from the British Standard and provides guidance on where Changing Places (CP) facilities should be provided.

Further Information: Extract from BS 8300:2009 + A1:2010, 12.7

"A CP facility should be provided in larger buildings and complexes, such as:

   a) major transport termini or interchanges, e.g. large railway stations and airports;

   b) motorway services;

   c) sport and leisure facilities, including large hotels;

   d) cultural centres, such as museums, concert halls and art galleries;

   e) stadia and large auditoria;

   f) shopping centres and shopmobility centres;

   g) key buildings within town centres, e.g. town halls, civic centres and main public buildings;

   h) educational establishments;

   i) health facilities, such as hospitals, health centres and community practices."

Case Study 16: Changing Places Toilet Westfield Stratford City

As a requirement of planning conditions Westfield Shoppingtowns Ltd were required to consult with the Stratford City Consultative Access Group (SCCAG) as part of the reserved matters application for Westfield Stratford City. The desire for a Changing Places facility was raised by the Stratford City during the very early planning stages, with references being made to the Changing Places Consortium for technical guidance, with City Hall being highlighted as an example.

Westfield Shoppingtowns readily accepted and recognised the concept and clearly incorporated it within its design team brief – to the extent that they willingly created two facilities within the same complex.

4.7.17   Further guidance on Changing Places toilets can be found from Changing Places website[60], the British Standard BS 8300:2009 + A1:2010, 12.7, "Changing Places: the practical guide"[61] and Changing Places.

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60   www.changing-places.org/

61   *Changing Places: the practical guide,* Changing Places Consortium, 2014, www.pamis.org.uk/cms/files/publications/Changing Places a Practical Guide.pdf

Assistance Dog Toilets

4.7.5   Developers and boroughs should also consider whether, in certain locations, it would be appropriate to provide an assistance dog toilet/spending run. This will mean that anyone visiting the area or facility with an assistance dog will have somewhere to toilet their dogs in a safe, clean and hygienic way. The list of possible suitable locations is similar to that for Changing Places toilets listed above. For further information see the LLDC's Inclusive Design Standards, section 11.

SPG Implementation Point 30: Provision of public toilets

Commercial development proposals are encouraged to assess the local provision of public toilets, and improve on/provide public toilets, including the provision of accessible toilets.

Boroughs should encourage leisure providers to provide public toilets or improve the accessibility of existing facilities. They should also monitor the public toilets available in the borough and the accessibility of these, for example via Town Centre Health Checks.

4.8   Education

4.8.1   It is the Government's aim that all disabled children and young people and those with special educational needs (SEN) reach their full potential in school. They should also be supported to make a successful transition into adulthood, whether into employment, further or higher education or training.

Early years provision

4.8.2   Access to adequate, high quality inclusive early years provision plays a key role in children's development. London Plan paragraph 3.101 identifies that early years facilities should be safe,

accessible for all (including disabled children), multi-functional and provide both indoor and outdoor learning opportunities.

Primary and secondary schools

4.8.3   London Plan paragraph 3.102 recognises that access to a high quality school education is a fundamental determinant of the future opportunities and life chances of London's children and young people.

4.8.4   National education policy favours greater diversity in the nature of supply, through the Academies Act 2010. The Academies Act sets out the Government's creation of state funded independent academy (including free) schools which can be run by parents groups, charities, businesses and private education providers. Maintained schools and academies, including free schools, must have due regard to the Public Sector Equality Duty.[62] This means that they must take active steps to identify and address issues of discrimination and inclusion.

4.8.5   There is no performance standard for the Equality Act which will guarantee an inclusive environment. However, there are many considerations regarding disabled children's needs that can be assessed and reasonable measures implemented to provide an accessible and inclusive educational environment. Building Bulletin 102[63] provides comprehensive advice to designers on how to integrate the access requirements of disabled children and children with special educational needs into the design of mainstream schools.

4.8.6   The Special Educational Needs and

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62 Section 149 of the Equality Act 2010
63 *Building Bulletin 102: Designing for disabled children and children with special educational needs,* Department for Children Schools and Families , 2008

Disability Code of Practice[64] emphasises that schools should ensure that pupils with SEN and disabled pupils should have access to all school activities and learning with their peers, irrespective of the individualised plans and support that schools are required to offer.

4.8.7 The London Plan paragraph 3.106 identifies that in order to support educational attainment and adapt to changing work and lifestyle patterns, the needs for facilities for children with special needs and additional pre or after school activities should to be considered.

4.8.8 School facilities can provide venues for a range of community activities, and cultural and sports activities which are used by the wider community outside school hours. As such these will need to be designed to be accessible and inclusive to the wider local community as well as the staff and pupils of the school.

SPG Implementation Point 31: Early years, primary and secondary provision

Early years, primary and secondary provision should incorporate the London Plan Policies on accessible and inclusive design. The latest design guidance, such as Building Bulletin 102 should be applied as a minimum and how inclusive design has been applied to non-standard areas will need to be clearly demonstrated in the design and access statement.

Further information: Design considerations for inclusive schools.

New learning areas should be designed with features such as:

- enhanced classroom acoustics on noisier campuses;

- soundfield speech enhancement in all classrooms and in halls, studios and larger learning spaces;

- small group and tutorial rooms spread throughout the school;

- accessible unisex toilets, close to each learning area;

- connecting corridors allowing wheelchair users to pass with ease;

- generously sized lifts that can operate in emergency as well as for everyday movement around the school; and

- high-acoustic standard office/interview room for the appointed SENCO teacher to operate from.

The design and access statements should always indicate where on the school campus the development will provide a SENCO hub or office; and the hygiene room facility ($12m^2$ in a secondary campus, $9m^2$ in a primary school setting); and how smaller tuition and small groups learning is to be spread throughout the school or college campus.

Case Study 17: Broadwater Farm Inclusive Learning Campus

Located in Tottenham, Broadwater Farm Inclusive Learning Campus is a brand new, two-storey primary school catering for both mainstream and special school education. As an inclusive school the new development helps to bring together children with different educational needs. This Primary school incorporates two Special Needs Schools with pupils from mainstream and SEN groups sharing lessons and spaces in as many ways as possible.

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64 *Special educational needs and disability code of practice: 0 to 25 years,* DfE 2014, www.gov.uk/government/publications/send-code-of-practice-0-to-25

This arrangement was made possible through extensive consultation with all three schools and an understanding of the requirements of each group. Inclusivity is at the heart of this vision.[1]

Broadwater Farm Inclusive Learning Campus boasts a range of facilities, including an amphitheatre, a library, hydrotherapy pool, a music studio, art space and a dedicated food technology and life skills suite. A sensory garden, a multi-use games area (MUGA), a wildlife pond and a horticultural area are also being created, along with external teaching zones and hard and soft play areas.

Haringey Council view the Broadwater Farm Inclusive Learning Campus as a flagship project and that will act as a guideline for the development of similar schools in the future. The shared spaces at the school also provides place for community use, further adding to the continued regeneration of the surrounding estate.

1   www.broadwaters.haringey.sch.uk/Vision

Higher and Further education

4.8.9   Higher education (HE) in London provides an unparalleled choice of undergraduate and postgraduate degrees, continuing professional development, advanced research, and infrastructure to support business growth. Universities also play a vital part in ensuring Londoners have the higher order skills necessary to succeed in a changing economy, and for the capital to remain globally competitive.

4.8.10   Access to further education (FE) is important for both the large proportion of Londoners who do not go into higher education and, in some places, for sixth form provision. FE colleges provide a key role in skills development and life long learning and will assist with

Londoners' employment.[65] They also provide valuable community facilities and services, and the Mayor will support the protection and enhancement of FE colleges and facilities.

4.8.11   Many facilities within HE and FE buildings, such as general classrooms, lecture theatres, offices, refreshment areas and so force are covered by good practice guidance such as BS 8300:2009 + A1:2010. However they also contain many specialist areas, for example practical vocational training areas and scientific research laboratories. The design of many of such facilities will not be covered by general inclusive design guidance and as such a more specific task based solution may be required.

SPG Implementation Point 32: Higher and further education facilities

HE and FE should incorporate the London Plan Policies on accessible and inclusive design. The latest design guidance should be applied as a minimum and how inclusive design has been applied to non-standard areas will need to be clearly demonstrated in the design and access statement.

Student accommodation

4.8.12   The London Plan Policy 3.7 identifies that ensuring equal life chances includes inclusive access to education facilities, whether schools, colleges, or universities. With further and higher education facilities often comes the need for residential student accommodation. In the context of ensuring equal life chances for all, meeting the needs of, and expanding opportunities for all Londoners and promoting social inclusion, the ability to accommodate disabled students should be fully integrated into any student housing development.

65 London Plan Policy 4.1 Developing London's economy

4.8.13 Disabled students should have the same choice as a non-disabled student. This should cover type of accommodation and location of the accommodation in regards to floor, view, and aspect.

4.8.14 The Muscular Dystrophy Trailblazers Campaign reported in 'Removing barriers, promoting independence'[66] notes the following regarding residential accommodation for University students.

Further information:'Removing barriers, promoting independence'

Accommodation

117. … A wheelchair user requires plenty of space to manoeuvre but also extra equipment which can take up a lot of room. It is for this reason that disabled people, particularly wheelchair users, require specially-adapted rooms which are not only larger but with special adaptations such as hoists and wet rooms…

119. We heard disabled students would like to see a larger choice of accessible rooms at varying price brackets, with the appropriate adaptations. This would give disabled students the same choice of accommodation as their non-disabled peers.

120. We also heard that some disabled students require a carer for 24 hours a day and so the carer requires a room close to the student they care for.

4.8.15 It is important that proposals achieve the suitable standards of inclusive design. Applicants proposals for student accommodation will be required to demonstrate how the principles of inclusive design, including the specific requirements that some disabled

people have, have been integrated, including access to all student facilities, visitability to all accommodation rooms (encouraging social opportunities) and the provision of accessible rooms.

4.8.16 When considering what percentage of accommodation should be wheelchair accessible from the outset it should be remembered that certain documents classify student accommodation in with hotel accommodation, for example Part M of the Building Regulations. The Approved Document to Part M (AD M) incorporates requirements regarding accessible student accommodation. Under the AD M one in twenty rooms (or 5%) should be wheelchair accessible.

Further information: The Mayor's Academic Forum

The Mayor's Academic Forum have identified that accessible accommodation provided was not necessarily attractive for occupation by other students. It was however noted that this was essentially a design issue which could be addressed by ensuring that provision could be readily adapted to accommodate wheelchairs should the need arise. It was also noted that it is for boroughs to determine the percentage of wheelchair accessible units over and above the Building Regulations 5% requirement, in light of their local circumstances[1]

1   *Mayor's Academic Forum Strategic planning issues for student housing in London Recommendations*, GLA, 2014

4.8.17 The London Plan requires 10% of all new hotel accommodation to be wheelchair accessible (see 4.9 of this SPG). Boroughs should consider the requirement for additional units that can be adapted for disabled students at a later date in line with the requirement for accessible hotel accommodation.

66 *Removing barriers, promoting independence, a report by the All Party Parliamentary Group for Young Disabled People on the issues affecting young disabled people in the UK,* November 2012

Case Study 18: Islington Core Strategy

Islington's Core Strategy, paragraph 3.3.26, clearly states that student accommodation schemes will be considered housing development for the purpose of applying Policy CS12H, which required the provision of 10% wheelchair housing in Policy DM17.

This was reviewed by the Planning Inspectorate in their Examination into the Islington Development Management Policies Local Plan. The report[1] concluded that after a full reading of the London Housing SPG revealed no conflict with the content of Policy DM17 and on that basis the inspectorate concluded that they are satisfied that the requirement for wheelchair housing is consistent with the Core Strategy and with the London Housing SPG.

1   Islington Council Development Management Policies Local Plan, Inspector's Report, Planning Inspectorate, June 2013

4.8.18 The rooms which are to be wheelchair accessible from the outset should incorporate the features and space requirements of a wheelchair accessible hotel room in Figure 60 of BS 8300:2009 + A1: 2010. It needs to be recognised that a standard wheelchair accessible room layout of fixtures and fittings might not meet the specific requirements of a disabled student and therefore allowing for adaptability rather than full fit out can be advantageous. Easily adaptable rooms should be provided with suitable structure and plumbing to allow for ease of adaptation in similar manner to the wheelchair adaptable housing. Features such as window heights, switch and socket heights and plumbing should all be in place to a wheelchair accessible standard from the outset, to ensure that the rooms are genuinely easy to adapt.

SPG Implementation Point 33: Student accommodation

Student accommodation should be designed in accordance with Policy 7.2 Inclusive Environments, to ensure that disabled students and visitors can live in and visit the development as a whole, not just the accessible bedrooms. The design and access statement should also clarify how the units are either accessible or easily adaptable to wheelchair accessible rooms.

Further information

Additional considerations for student accommodation

In order to ensure student accommodation is designed to the appropriate standards of accessible and inclusive design throughout, the following should be considered:

- ensure that disabled students and visitors can live in and visit the development as a whole, not just the accessible bedrooms; ideally a minimum of two lifts should be provided in each core in order to ensure that step free access can be maintained in the event of breakdown or periods of maintenance;

- providers should consider providing blue badge bays for disabled students that need a car to live independently;

- providers should also consider the requirements of students with a variety of impairments, and measures to assist orientation and wayfinding around the development;

- some disabled students may require someone living nearby to assist them; plans should therefore incorporate some accessible rooms with the option of an interconnecting door to a neighbouring room;

- space allocation of an accessible hotel bedroom might not on its own provide sufficient space for study and daily living and as such consideration should be given for the extra equipment or mobility aids that a disabled student may need;

- consider how rooms can be adapted for students who are blind or partially sighted, Deaf or hard of hearing and students with assistance dogs;

- consider the production of an accessibility management plan which can also be used to identify how accessible rooms will be allocated and adapted (see section 4.9 of this SPG).

4.9 Accessible visitor facilities

Extract from London Plan Policy 4.5 London's visitor infrastructure

Strategic

A   The Mayor will, and boroughs and relevant stakeholders should:

   a   support London's visitor economy and stimulate its growth, taking into account the needs of business as well as leisure visitors and seeking to improve the range and quality of provision especially in outer London

   b   seek to achieve 40,000 net additional hotel bedrooms by 2031, of which at least 10 per cent should be wheelchair accessible

Planning decisions

B   Developments should:

   a   contribute towards the hotel provision target and ensure that at least 10 per cent of bedrooms are wheelchair accessible

   LDF preparation

C   LDFs should:

   a   seek to ensure that all new visitor accommodation meets the highest standards of accessibility and inclusion and encourage applicants to submit an accessibility management plan with their proposals

4.9.1   Visitors play an important part in London's economy and older and disabled people from all over the UK, Europe, North America and beyond are travelling more and are increasingly contributing to the visitor economy.[67] This is being facilitated by the gradual removal of physical and social barriers, by a change in attitudes and by rising expectations. Public buildings and spaces, buses and taxis already provide a very high degree of accessibility, and improvements continue to be made on the Underground and at rail stations.

The external lift at Trafalgar Square

67   *Accessible Hotels in London, LDA,* 2010, Visit England Business Case, www.visitengland.org/busdev/bussupport/access/buscase/index.aspx

4.9.2   The Paralympic Games in 2012 demonstrated that London is becoming increasingly accessible across all aspects of the visitor experience and there are opportunities to build on achievements to date. However, there is still work to do to ensure that visitors have an end to end enjoyable and accessible experience, from when they plan and book their visit, leave home, travel to their destination, the experience they have and the recollection of their trip once home.

4.9.3   Developments for new hotels and visitor attractions can, by careful planning and by meeting the highest standards of accessible and inclusive design, ensure that all disabled and older people enjoy the same level of access and service provided to all other hotel and attraction customers.

4.9.4   A particular London Plan priority is to improve the availability of hotel accommodation that is genuinely inclusive and accessible. All hotel operators are encouraged to provide an inclusive and welcoming hotel experience by the provision of an accessible physical environment, appropriate room fit-out and equipment, and management practices. Appendix 10 provides more details on what is expected at planning application stage for hotel developments to meet the London Plan requirements of 10% accessible rooms and the highest standards of accessible and inclusive design.

4.9.5   BS 8300:2009+A1: 2010, in relation to hotel premises, specifies that accessible rooms should cater for a wide range of disabled people and sets out the following requirements:

- 5% of all rooms to be wheelchair accessible;

- 5% of rooms to be fitted with a fixed tracked-hoist system or similar system giving the same degree of comfort and safety;

- 5% of rooms to be capable of being adapted in the future to accessibility standards.

4.9.6   It also recommends that it can be advantageous for some accessible bedrooms to have a connecting door to an adjoining room for use by an assistant or family member.

SPG Implementation Point 34: Accessible hotels

To promote inclusion and take-up by as many different customers as possible, borough and developers should ensure accessible rooms are provided in rooms of different types and sizes.

The design and access statement should demonstrate the adaptability and flexible furniture, and the range of types of rooms provided including the provision of adjoining rooms and hoist were appropriate.

Further information: Accessible Hotel demand

"Inclusive travel is a sizeable market, which is still in expansion. The UK Travel Survey proved that disabled people and their families spent more than £ 1.8 billion on UK travel in 2009. When inbound travel by European and overseas visitors is included, the market grows substantially. In 1993, Touche Ross [Profiting from opportunities, 1993] estimated that 117 million visits to Britain could be generated by disabled travellers, including their travelling companions The potential was estimated at £22 billion in extra tourism expenditure for Europe overall. In other European countries, inclusive travel is a well recognised market sector, which is often actively promoted."[1]

1   *Accessible Hotels in London,* GLA, 2010
    www.london.gov.uk/priorities/planning/publications/
    accessible-hotels-in-london

Case study 19: Accessible bedrooms Four Seasons Hotel at Heron Plaza

The design of the accessible bedrooms was developed to accord with guidance contained within the report 'Accessible Hotels in London'[1].Following consultation with the City of London and GLA's Principal Access Advisor the design team developed a strategy to provide a total of 10% of the rooms to be accessible (5% accessible and fully fitted out and 5% easily adaptable).

The scheme includes rooms that will be easily be able to be provided with hoists for disabled guests when required and also meeting the high standard of finishes required by a luxury hotel operator. The 5% designed for adaptation to meet future demand, included integrated wall fixings to allow ease of adaptation without the need to damage the finishes of the bathrooms.

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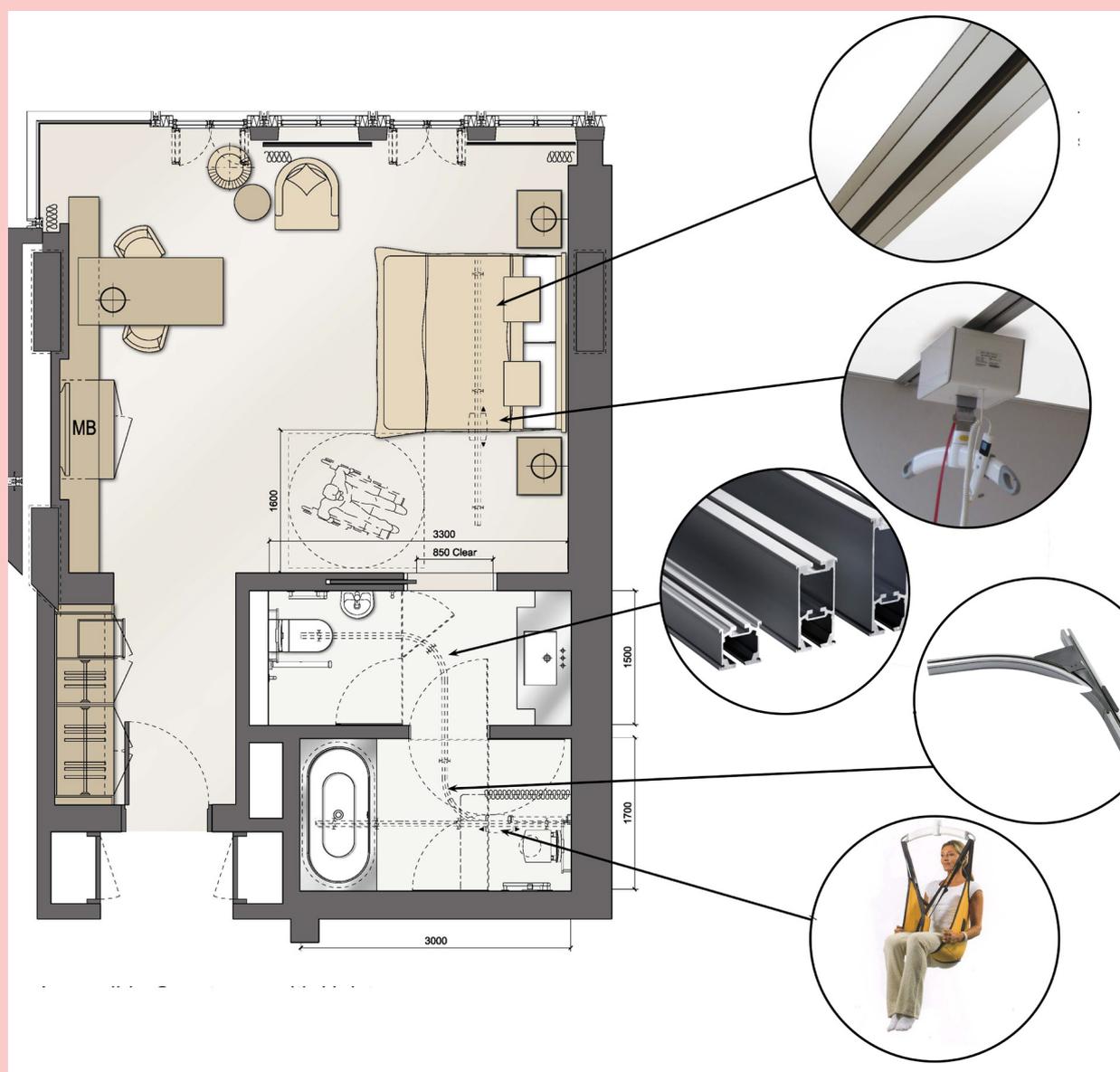
1   www.london.gov.uk/priorities/planning/publications/accessible-hotels-in-london

Accessibility management plans

4.9.7   The London Plan[68] encourages the preparation of accessibility management plans (AMP) to ensure that the management and operation of facilities are fully considered at the outset of the design and that accessibility and inclusion are monitored and maintained throughout the life of the development. An AMP is therefore distinct from a design and access statement, which sets out the physical provision and design rationale. The AMP should accompany the planning application in a similar way to a Travel Plan. Further guidance on AMPs is provided in Appendix 9.

SPG Implementation Point 35: Accessibility management plans

To ensure accessibility and inclusion are monitored and maintained Boroughs are encouraged to require accessibility management plans to accompany planning applications in line with Policy 4.5. If an operator is not known then it is recommended that the provision of an AMP is conditioned.

Further Information: Visit England Business Case: At Your Service Guide

There is a compelling business case for making our tourism industry more accessible:

- Over one quarter (27%) of the UK population have a long-standing health problem or disability.

Attracting the business of someone with access needs attracts the spend of their entire party:

- In 2009, UK residents with a health condition or impairment and their travelling party spent almost £2bn on overnight trips in England.

- Older people in particular benefit from more accessible accommodation and attractions. They may need a large print menu, more places to sit down or a support rail next to the toilet. The importance of meeting the needs of older people is increasing every year.

- By 2025 more than a third of the UK's population will be over the age of 55.

- Tourism businesses that have improved their accessibility often report that people with access needs are very loyal:

  - "They tend to come back regularly. They are a very loyal market." Elms Farm Cottages;

  - Accessible tourism is very much in demand, for example, the demand for accessible accommodation outstrips the current supply;

  - "We enjoyed occupancy levels rising to 97%, compared with a Northumberland average of 55%." The Hytte

The videos are available on line to hear how tourism businesses are 'Profiting through Accessible Tourism'.[1]

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1   www.visitengland.org/busdev/bussupport/access/buscase/index.aspx
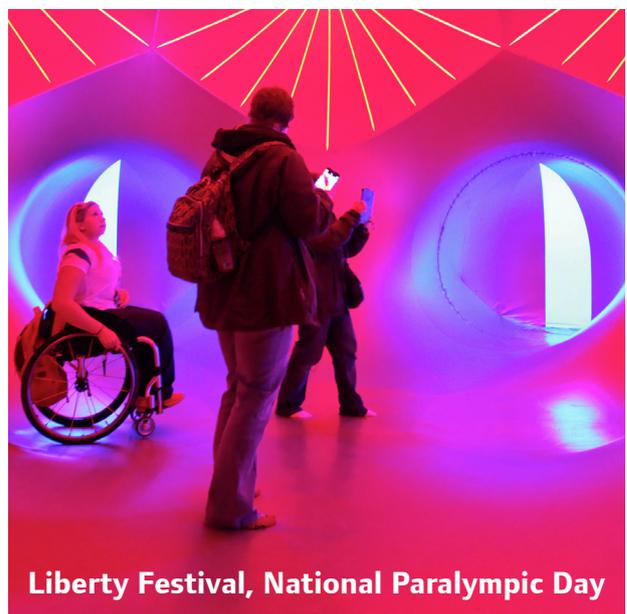
Liberty Festival, National Paralympic Day

4.10   Arts, culture, and entertainment

Extract from London Plan Policy 4.6 Support for and Enhancement of Arts, Culture, Sport and Entertainment

Strategic

A   The Mayor will and boroughs and other stakeholders should support the continued success of London's diverse range of arts, cultural, professional sporting and entertainment enterprises and the cultural, social and economic benefits that they offer to its residents, workers and visitors.

Planning decisions

B   Developments should:

c   be accessible to all sections of the community, including disabled and older people

4.10.1   London's cultural and creative sectors are central to the city's economic and social success. London is home to an internationally renowned historic environment, natural landscape and cultural institutions, including museums, galleries and theatres, as well as major visitor attractions. London is a great city for night time entertainment and socialising, with a unique selection of bars, restaurants, performing arts venues, cinemas and night clubs. The night time economy also forms an important part of London's economy.

4.10.2   Disabled people should have the same opportunities to experience and participate in arts, culture and entertainment in London as non-disabled people, whether during the day or experiencing the night time offering. Development proposals should be designed to ensure that disabled people can participate fully.

4.10.3   Significant improvements have been made in the last 10 years in the accessibility of many of London's

cultural, arts and entertainment venues, helped in part by the work the Arts Council have done to promote access and inclusion as part of their strategic framework for the arts[69]. The Arts Council recognises that access and inclusion are key to realising their desired outcomes of excellence, reach, engagement, diversity, and innovation and achieving great art for everyone. They published 'Building Inclusion'[70] to help plan, deliver and create an accessible and equitable environment. The Arts Council recognise, when providing capital investment grant, that buildings remain an essential factor in ensuring that disabled people are able to participate and engage in all aspects of the arts and they expect that when a new building or the refurbishment of an existing building is planned, consideration is given to access in relation to all aspects of the building including areas used by performers and staff (including technical staff) as well as those areas that are publicly accessible.

4.10.4   Many of London's major arts and entertainment institutions, such as the Victoria and Albert Museum, the English National Opera, the South Bank Centre, the National Theatre, now have full access programmes (including for example relaxed performances at the National Theatre) and comprehensive access information on their web sites, and they are continually improving the physical accessibility of their buildings.

4.10.5   The London 2012 Olympic and Paralympic Games provided a unique opportunity to showcase London's unrivalled arts and culture to the world. The Mayor presented and supported the most exciting and ambitious cultural

69   *Achieving great art for everyone, A strategic framework for the arts,* Arts Council, 2010

70   *Building inclusion Physical access guidance for the arts,* Arts Council, 2008 updated 2013 www.artscouncil.org.uk/publication_archive/building-inclusion-physical-access-guidance-for-the-arts

festival the city has ever seen. These events were made accessible to disabled people with the assistance of Attitude is Everything who provided initial training to producers and borough arts officers to help them develop access action plans and strategies, and organisations such as VocalEyes who provided audio description and Remark! who provided British Sign Language interpretation. The 'Summer Like No Other' festival demonstrated that access can be provided in outdoor locations for small and large events. Attitude is Everything evaluated the accessibility of these events and provided the GLA with some helpful advice on future improvements[71].

4.10.6   There are, however, still areas to improve. The Muscular Dystrophy Trailblazers Campaign reported in 'Removing barriers, promoting independence'[72] that there is still scope to improve access to cinemas:

Further information: 'Removing barriers, promoting independence'

"Cinemas need to work more closely with disability rights organisations and architects to place inclusivity at the forefront of design as well as staff training goals. Cinemas should design wheelchair-accessible spaces [that] are integrated throughout auditoriums so disabled customers can have choice and better seating options, and they do not have to be assigned seating beyond the back row of the auditorium. Cinemas should consider the value of 'Changing places' toilets and install them in all new cinemas. All automatic doors and lifts should be routinely and regularly tested and fixed…"

4.10.7   Developers should ensure that any development proposals involving visitor facilities, arts, culture and entertainment facilities incorporate the highest standards of accessible and inclusive design.

4.10.8   Boroughs should continue to encourage leisure, arts and cultural site providers to audit their facilities; identifying and acting on any improvements that could be made in terms of inclusive design and access for disabled people. These improvements could include removing physical barriers to their premises, and the services they offer (e.g. lowered bar areas), providing accessible viewing areas, wheelchair accessible toilets, disability equality training for staff, Blue Badge parking, and improved access to 'backstage' or 'behind the scenes' areas for disabled performers and staff.

SPG Implementation Point 36: Leisure, arts, entertainment and cultural sites

To ensure that disabled and older people are able to watch, experience and participate in leisure, arts and cultural activities without experiencing disabling barriers:

• Developers should ensure that any development proposals involving visitor facilities, arts, culture and entertainment facilities incorporate the highest standards of accessible and inclusive design.

• Boroughs should encourage leisure, arts and cultural site providers to audit their facilities; identifying and acting on any improvements that could be made in terms of inclusive design and access for disabled and older people.

71 *Summer Like No Other Evaluation Report on London 2012, GLA, 2012*

72 *Removing barriers, promoting independence report by the All Party Parliamentary Group for Young Disabled People on the issues affecting young disabled people in the UK, November 2012*

Case Study 20: Up at the O2

By working creatively with disabled people and with an access consultant the O2 has made their walk over the roof of the building 'Up at the O2' accessible to wheelchair users. The work did not just look at the physical design but operational factors and the quality of experience for all.

A video of Attitude is Everything CEO Suzanne Bull's climb is available at www.attitudeiseverything.org.uk/news/watch-suzannes-up-at-the-o2-challenge-1

Further sources of information:

- The Cinema Exhibitions Association provides guidance on making cinemas accessible to disabled people see 'Best Practice Guidelines for the Provision of Services to Disabled Customers and the Employment of Disabled People' at www.cinemauk.org.uk/key-issues/34

- Attitude is Everything - an organisation which works to improve deaf and disabled people's access to live music by working in partnership with audiences, artists and the music industry to implement a Charter of Best Practice across the UK. Details at www.attitudeiseverything.org.uk/

- Artsline is a website containing information on accessible arts and entertainment venues in the London area. Details at www.artsline.org.uk

- The Arts Council England provides various guidance documents on access and inclusion in the arts. Details at www.artscouncil.org.uk

- Disability Arts online - an online journal for the discussion of arts and culture giving disabled and deaf artists, performers, film-makers, writers, and critics a place to talk about and share artistic practice. Details at www.disabilityartsonline.org.uk/home

- London 2012 Cultural Olympiad - was the largest cultural celebration in the history of modern Olympic and Paralympics Movements. Details at www.london.gov.uk/priorities/arts-culture/culture-2012

- The Mayor of London's Liberty Festival showcases the creative talents of deaf and disabled artists and features an exciting mix of street theatre, dance, live music, film, children's activities and stalls. See more at: www.london.gov.uk/eget-involved/events/national-paralympic-day-featuring-liberty-festival#sthash.GdwyAdrx.dpuf

4.11. Sport

Extract from London Plan Policy 3.19 Sports Facilities

Strategic

A   The Mayor's Sports Legacy Plan aims to increase participation in, and tackle inequality of access to, sport and physical activity in London particularly amongst groups/areas with low levels of participation.

Planning decisions

B   Development proposals that increase or enhance the provision of sports and recreation facilities will be supported…

See also London Plan Policy 4.6

4.11.1   The London 2012 Olympic and Paralympic Games demonstrated what can be achieved when inclusive design principles are embedded into a project from the outset. The park and venues were designed with accessibility enshrined into the thinking of the designers, not just to ensure that the Paralympic athletes could excel in their sport but enabling disabled spectators, staff, volunteers, the Olympic family, the press, and visitors to the park to enjoy and participate to the same extent as non-disabled people.

4.11.2   The inclusive design process to build the park started with the bid to host the 2012 Games with commitments made in the bid book to ensure that the Games would demonstrate best practice in access for disabled people. In preparation for the 2012 Olympic Bid the London Development Agency (LDA), acting as developer, applied for outline planning permission for a development that would enable the Olympic and Paralympic Games to be held in the Lower Lea Valley and for the later transformation for the regeneration of the Lower Lea Valley. One of the planning conditions for the application was the submission of an 'Access for All Strategy'. The Development Specification and Framework of the Lower Lea Valley Olympic and Legacy Planning Applications set out the Parameters and Principles for the framework.

Further information: Parameters and Principles for the Access For All Framework:

The Parameters and Principles state that The Access For All Framework should accord with the following parameters and principles to ensure that:

• the principles of inclusive design inform and will be fully integrated into the proposals;

• best practice standards (not minimum standards) will be used in the design;

• a framework will be created which ensures that designers and users work together to deliver the best reasonably practicable solutions for achieving inclusive access;

• the establishment of an Access Forum after the award to London of the 2012 Games, to provide engagement with all stakeholders;

• individual venue access plans to be provided prior to commencement of construction or conversion of each venue; and

• the provision of all residential developments to be designed to further 'Access for All' and to 'Lifetime Home' standards, including a 10 per cent wheelchair access provision for the Legacy Development.

Case study 21: Pool Pod

One of the legacy outcomes from the Games was the development of a more dignified way for people unable to use the stepped access to get in and out of a swimming pool – the traditional hoist can be a daunting experience, can be a bit of a spectacle and cannot be used independently relying on a member of staff to operate the equipment. The Pool Pod is a platform lift that provides wheelchair users with independent access into and out of the pool, providing a more dignified experience.

The Pool Pod was developed with the support of the ODA and Sport England and is installed in Mile End swimming pool and in the Aquatics Centre in the Queen Elizabeth Olympic Park when it reopened in 2014.

4.11.3 The Access for All Framework published by the London Development Agency set out the methodology for embedding inclusive design into the planning and development process and this was followed through by the designers of the Olympic Park Masterplan and required by planning conditions and the section 106 agreement in the planning permissions. This led to the development of the ODA's Inclusive Design Strategy and Standards (see Case Study 22).

The process has been continued by the London Legacy Development Corporation (see Case Study 3). This model of embedding inclusive design principles into the planning and development process is one which all developments in London can and should adopt wherever practical and feasible.

4.11.4 The Paralympic Games has helped to change attitudes towards disabled people and towards their participation in sport and sporting activities, but this legacy will only persist if we remain vigilant and continue to improve access to sports facilities. The physical accessibility of sports and recreation facilities is crucial if disabled people either as elite athletes, athletes or beginners, are able to participate and feel comfortable using the facilities. Sport England updated its design guidance[73] on making sports facilities accessible in 2010 and is updating it again using the learning from the Games.

Case study 22: Olympic Delivery Authority Inclusive Design Strategy (ODA)

The ODA's Inclusive Design Strategy (2008) set out the ODA's understanding of inclusive design, its objectives in meeting inclusive design principles, and how it intended to deliver inclusive access.

It outlined relevant corporate commitments and the legal framework and signposted the reader to a separate document which sets out specific inclusive design standards to be adopted by all design teams working on Olympic venues.

It explained how the ODA would engage with organisations of disabled people by setting up an Access and Inclusion Forum, a

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73 *Accessible Sports Facilities Design Guidance,* Sport England, 2010

Built Environment Access Panel (BEAP) and a Transport Access Panel, and by holding technical forum events for key stakeholders. It explained how it would monitor the implementation of its adopted inclusive access standards, its compliance monitoring procedures and reporting processes and the staff resources available to undertake the task.

The ODA's compliance reporting process was particularly important in ensuring that the highest standards of accessible and inclusive design were maintained throughout the design process.

The ODA's Access Manager reported any variations from the agreed ODA Inclusive Design Standards so that any issues could be resolved before the project progressed to the next design stage.

4.11.5   The London Plan also recognises the wider benefits of Londoners participation in sports.[74] Sports and recreation facilities are important parts of the social infrastructure, providing a range of social and health benefits for communities and neighbourhoods. In London such facilities have been given increased prominence since the 2012 Games.

4.11.6   Development proposals for new sporting facilities, whether these be community facilities, private, or within schools, should ensure that inclusive access issues are addressed from the outset, so that disabled and older people's ability to participate in sporting activities is increased.

SPG Implementation Point 37: Access to and use of sports facilities

In order to ensure Londoners can access inclusive and accessible sports facilities boroughs and developers should aim to achieve the highest standards of accessible and inclusive design, following the example set by the Olympic and Paralympic venues.

Case Study 23: Ironmonger Row Baths Refurbishment

Ironmonger Row Baths, which was originally constructed in 1931, has undergone an extensive refurbishment which has transformed the baths into an incredible modern facility for residents.

The project restored the main pool and installed a new teaching pool with moveable floor, created a new, larger gym and provided two new exercise studios. The works also included restoring historical features including the Turkish Baths.

Inclusive Design was a core part of the brief, ensuring improved accessibility and usability throughout the building for all users. The project received an Inclusive Fitness Initiative 'Excellent' rating. The planning officers' report to the planning committee, recommending approval for the planning application, identified that the "proposed development would provide for inclusive and convenient access for all users."

The local Access Officer facilitated the close collaboration between the design team and Disability Action in Islington, an advisory group who attended site visits as well as scrutinising similar facilities.

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74   Policy 3.2 Improving health and addressing health inequalities, and Policy 3.16 Protection and enhancement of social infrastructure

4.12   Historic environment

LDF Preparation

G   Boroughs, in consultation with English Heritage, Natural England and other relevant statutory organisations, should include appropriate policies in their LDFs for identifying, protecting, enhancing and improving access to the historic environment and heritage assets and their settings where appropriate, and to archaeological assets, memorials and historic and natural landscape character within their area.

4.12.1   London's diverse range of historic buildings and landscapes, including four World Heritage Sites, contribute to its status as a world class city. This diversity is a product of the way London has grown in the last 2000 years, embracing older settlements and creating new ones, often shaped by the age they were developed. This sheer variety is an important element of London's vibrant economic success, world class status, popularity as a visitor destination and unique character. London's heritage assets and historic environment also make a significant contribution to the city's culture by providing easy access to the history of the city and its places.

4.12.2   Crucial to the preservation of this character is the careful protection and adaptive re-use of heritage buildings and their settings. This often provides the opportunity to improve access for disabled people and there are now a considerable number of very good examples in London where access improvements have been successfully achieved, adding a new layer of history to our historic buildings and landscapes.

Case Study 24: Lift Access to Tower Bridge

Following discussions with English Heritage, the City of London obtained planning permission and listed building consent to install a passenger lift adjacent to the Grade 1 listed Tower Bridge in 2011. The lift was opened to the public in May 2012, in time for use by the large number of visitors in London for the Olympic and Paralympic Games.

This glass lift now provides step free public access from the riverside walk to the bridge relieving the congestion on the adjacent staircase and providing easy and direct access for disabled and older people and people with pushchairs between the Tower Bridge Exhibition and the Engine Room Museum.

Further information: English Heritage's commitment to access.[1]

Too many people think of the historic environment as being inaccessible. English Heritage knows that this need not be the case. On the contrary, we have seen and been involved with some amazing solutions to all types of barriers, physical and otherwise. What we have learnt is that with the right kind of thought and discussion a way can be found round almost any barrier. We also recognise that people's expectations – and the technical opportunities to meet them – are constantly evolving. For that reason we are using our growing awareness to the issues disabled people face to constantly improve the accessibility of all our own services. While the needs of disabled people must be our highest priority, we also know that easier access will benefit almost all of us at some stage in our lives. Whether during pregnancy, as a parent pushing a buggy or an older person who is finding steps a bit harder to manage, we all value thoughtful and effective design for our access needs.

We want to see the broadest possible public access to the historic environment and to the interpretation that makes it come alive. This is because we believe that the historic environment can make a positive difference to the lives not only of individuals but whole communities. For that reason we will continue to promote solutions that make access easier while simultaneously encouraging responsible care of the historic places that matter to us all. In its search for a more inclusive approach to the historic environment English Heritage is keen to celebrate access solutions that combine conservation with excellent, high quality modern design.

1   *Easy Access to Historic Buildings*, English Heritage, 2012
    Easy Access to Historic Landscapes, English Heritage, 2013

Case Study 25: Guildhall Great Hall

These before and after photographs of the Great Hall entrance in the Grade 1 listed Guildhall in the City, demonstrate how sensitive intervention has created a more accessible and more functional space. The three steps into the Great Hall have been overcome by raising the floor level and creating a gentle slope down to Guildhall Yard. Changing the roof enabled the removal of the supporting columns, which improved the lighting levels and opened up this ceremonial space, creating a more useable, accessible and more legible entrance.

4.12.3 English Heritage recognises that 'In most cases access can be improved without compromising the special interest of historic buildings. There are only rare occasions when nothing can be done to improve or facilitate access. By undertaking a careful process of research, brief-drafting, consultation and creative exploration of alternatives, good quality solutions that add a new layer of history to our historic buildings are usually possible.[75]

4.12.4 The EH guide provides advice on all aspects of making a historic building accessible including establishing an access strategy, overcoming barriers, making access a reality with practical examples and where to go for help.

4.12.5 EH strongly advise that before any work is undertaken to improve access to a listed building an access strategy is established and this is linked to the conservation assessment[76]. Key to a successful strategy is clarity, being sure that the needs of visitors and users are clearly understood, as well as understanding the sensitivities of the building. Strategic commitment from the top of the organisation is a vital component, as is identifying someone responsible for implementing and reviewing the changes.

4.12.6 Specialist advice from an access consultant with expertise in conservation, and a borough based conservation or heritage officer is recommended when dealing with historic or listed buildings.

4.12.7 The GLA's SPG on the setting of London's four World Heritage Sites[77] provides advice on identifying opportunities to enhance both access to and within World Heritage Sites and their interpretation. World Heritage Site Management Plans, borough DPDs and other relevant strategies should identify these opportunities. Developers can contribute to these enhancements where appropriate.

SPG Implementation Point 38: Conservation and heritage assets

The opportunity to identify and implement improved levels of inclusive access for disabled and older people should be taken when an historic or listed building or heritage asset is to be re-used, refurbished, or its setting is altered.

Using specialist access and conservation advice to establish an initial access strategy can help to ensure proposals are appropriate and effective.

Further information

Easy Access to Historic Buildings, English Heritage, 2012: www.english-heritage.org. uk/publications/easy-access-to-historic-buildings/easy-access-historic-buildings2012. pdf

Easy Access to Historic Landscapes, English Heritage, 2013: www.english-heritage.org.uk/ publications/easy-access-historic-landscapes/

London Plan SPG London World Heritage Sites Guidance on Settings, GLA, 2012, (paragraphs 4.48-4.52 Accessibility and Inclusion): www.london.gov.uk/priorities/ planning/publications/london-world-heritage-sites-guidance-on-settings

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75 *Easy Access to Historic Buildings, page 7 para 3*
76 *Easy Access to Historic Buildings, page 16*
77 *London Plan SPG London World Heritage Sites - Guidance on Settings, GLA, 2012*

APPENDICES

Appendix 1: SPG implementation points

Appendix 2: Statistics

Disabled and older Londoners

· Currently 19% of the population of London (circa 1.5m) has a long-standing illness, disability or infirmity;[1]

· 53% of those aged 65+ have a long-standing illness, disability or infirmity;[2]

· Disabled people are almost twice as likely to be unemployed as non-disabled people[3]

· 21% of working age Londoner's are disabled;[4]

· While many older people are choosing to remain in their own homes for longer, around 10-15% of older people appear likely to want to move into specialist older persons housing;[5]

· While London is expected to experience substantial growth in the population of older people[6] – this has already begun to emerge as an issue in some boroughs, especially in Outer London.[7] The projected number of people over 64 is projected to increase by 64 per cent (nearly 580,000) to reach 1.49 million by 2036;

· Around 5% of all those aged 65+ use a wheelchair;

· The over 90s are expected to grow in number, by 89,000, as medical advances, improvements in lifestyles and new technologies support improved life expectancies;

· Not only are the numbers of older people growing, but the average number of years people survive with a disability or long term illness is increasing;

· 21% of over 65s have mobility impairments and this rises to 50% of females and 35% of males over 85;[8]

· 6% of over 75s have a registerable eye condition;[9]

· 23% of over 85s have dementia;[10]

· 51% of males and 74% of females over 85 are unable to manage at least one self-care activity.[11]

Housing

The latest statistics on the housing needs of households including disabled people are from four years of the English Housing Survey 2008/09 to 2011/12.

The headline figures[12] are below. Note that all of these figures should be treated as approximate:

· Around 240,000 households, 8% of all households in London, say that the disability of a household member requires a home adaptation, compared to a national percentage of 9%;

· Of these, around 25,000 or just over 10% say they are attempting to move to somewhere more suitable to cope with the disability, compared to a national percentage of 8%.

1   GLA analysis of English Housing Survey 2008/09 to 2011/12
2   GLA analysis of English Housing Survey 2008/09 to 2011/12
3   London Plan 2011, 1.28
4   GLA Analysis of the Labour force Survey Q4 2013
5   *London Housing Strategy*. GLA, February 2010
6   *The role of the planning system in delivering housing choice for older Londoners. Report for the GLA.* Cambridge Centre for Housing & Planning Research, Three Dragons, Land Use Consultants. (Cambridge et al) , 2012
7   *HM Government. Housing Strategy 2011* op cit paras 6.25 - 38

8   DMAG. 2010 round borough projections. GLA, 2011
9   Projecting Older People Information System (POPPI) based on: National Statistics. Living in Britain. General Household Survey 2001, table 29
10 POPPI based on: Charles, Nigel. The number of people in the UK with a visual impairment: the use of research evidence and official statistics to estimate and describe the size of the visually impaired population, RNIB, July 2006
11 Self care activities defined as bathe, shower or wash all over, dress and undress, wash their face and hands, feed, cut their toenails, take medicines; Source: POPPI based on Living in Britain Survey 2001 ibid, table 35
12 GLA analysis of English Housing Survey

Appendix 3: RIBA Plan of Work inclusive design overlay[1]

The following table developed by the National Register of Access Consultants illustrates, by using the RIBA Plan of Work, where in the design process inclusive design activity should take place.

RIBA Work Stage 2013	Description of Key Tasks	Core Inclusive Design Activities
0 **Strategic Definition**	Identify client's **Business Case** and **Strategic Brief** and other core project requirements	• Identify inclusive design issues from user feedback to be included in the brief and support Business Case
1 **Preparation and Brief**	Develop **Project Objectives**, including **Quality Objectives** and **Project Outcomes**, **Sustainability Aspirations**, **Project Budget**, other parameters or constraints and develop **Initial Project Brief**. Undertake **Feasibility Studies** and review of **Site Information**.	• Confirm scope of services • Identify relevant user group for consultation and establish communication as early as possible to be able to organise suitable venues, alternative information and range of dates and forms of response / communication • Access audit of existing and proposed site for extension / refurbishment to existing to identify issues to be included in the brief and support Business Case • Desktop review of feasibility study • Identify mandatory design criteria applicable or advise on best to adopt

RIBA Work Stage 2013	Description of Key Tasks	Core Inclusive Design Activities
2 **Concept Design**	Prepare **Concept Design** including outline proposals for structural design, building services systems, outline specifications and preliminary **Cost Information** along with relevant **Project Strategies** in accordance with **Design Programme**. Agree alterations to brief and issue **Final Project Brief**.	• Desktop design appraisal of revised / updated plans • Review of revised / updated associated project strategies including acoustic, fire/egress, sustainability, maintenance and operational • Client, design team and consultation meetings • Undertake consultation with designated user group and incorporate feedback into revisions
3 **Developed Design**	Prepare **Developed Design** including coordinated and updated proposals for structural design, building service systems, outline specifications, **Cost Information** and **Project Strategies** in accordance with **Design Programme**.	• Desktop design appraisal of plans • Review of associated project strategies including acoustic, fire/ egress, sustainability, maintenance and operational • Produce draft access element of the design and access statement for the planning application and liaise with associated local authority access champion / conservation officer/ planning case officer regarding this • Client, design team and consultation meetings • Undertake consultation with designated user group and incorporate feedback into revisions

RIBA Work Stage 2013	Description of Key Tasks	Core Inclusive Design Activities
4 **Technical Design**	Prepare **Technical Design** in accordance with **Design Responsibility Matrix** and **Project Strategies** to include all architectural, structural and building services information, specialist subcontractor design and specifications in accordance with **Design Programme**.	• Review and update Sustainability, Maintenance and Operational and Handover Strategies in association with inclusive design aspects • Prepare 'Part M schedule' as part of Building Control access strategy submission and any other third party submissions requiring consent • Update access strategy against tender packages
5 **Construction**	Offsite manufacturing and onsite **Construction** in accordance with **Construction Programme** and resolution of **Design Queries** from site as they arise.	• Attend site meetings if required • Review material samples and provide recommendations • Ad hoc advice on issues that arise through construction
6 **Handover and Close Out**	Handover of building and conclusion of **Building Contract**.	• Audit of completed building • Produce a management plan flow chart
7 **In Use**	Undertake **In Use** services in accordance with **Schedule of Services**.	• Post occupancy audit 12 months after completion or according to project Schedule developed in Stage 0 or 1 • Continuation of handover actions and update with amended policies in response to feedback, monitoring

Appendix 4: Design and access statement content guidance

This appendix sets out the requirement of the content of an access section of the design and access statement and provides advice about what the Mayor expects to be included. This is not an exhaustive list and we recommend you seek guidance from the links below. This is intended to encourage the applicant to think about access and inclusive design issues holistically.

Access section contents

Key questions when preparing an access section:

1. Have you explained how the physical characteristics of the scheme have been informed by a rigorous process which includes assessment, involvement, evaluation and design?

2. Has the approach to inclusive access infused the whole document rather than being limited to the access part of the statement? For example have you addressed inclusive design in your descriptions of the uses and the amount of development proposed, the layout on site, the scale of buildings and spaces, in the landscaping details, and in how a good appearance will be achieved and maintained?

3. Has the access element of the statement explained how you are meeting inclusive design principles? www.designcouncil.org. uk/publications/the-principles-of-inclusive-design/

4. Does your access section clearly demonstrate:
   - a commitment to inclusive design;
   - the philosophy and approach to inclusive design;
   - set out your strategy to achieve inclusive access;
   - how local planning authority access policies have been taken into account;
   - how the principles of inclusive design have been embedded into the scheme;
   - the key access issues of the particular scheme;
   - the sources of advice and design guidance used;
   - consultation outcomes;
   - how inclusion will be maintained and managed

5. Does your access section:
   - highlight specific provision for disabled people;
   - incorporate the recommendations of access officers and local access groups;
   - aim for the highest standards not the minimum;
   - justify any deviation from accepted good practice;
   - explain the relationship between design and management;
   - highlight issues of ongoing management and maintenance;
   - make it clear what can be tied down in planning conditions and/or Section 106 agreements;
   - explain and justify the decisions taken so far and explain the principles that will be followed when the details are designed after permission is granted;
   - set out how inclusive access will be addressed in any masterplan reserved matters applications.

6. Does your assessment of the proposals include how users:
   - gain access from the public transport network;
   - access and use any parking provision;
   - access and use the public realm including areas of private and public open space;

- negotiate any changes in level;
- can easily orientate themselves and find their way around the development.

7. For residential schemes have you:

- demonstrated how each of the 16 Lifetime Homes standards have been addressed
- demonstrated how the key features of wheelchair accessible housing standards have been addressed in at least 10% of the new homes
- included typical flat layouts and plans of the wheelchair accessible homes and the Lifetime Homes that clearly illustrate the relevant accessible features
- identified the location of the wheelchair accessible flats and clearly stated how many there are
- considered how the resident and visitor blue badge parking bays will be managed and enforced and set this out in a parking management plan
- considered producing a specific marketing strategy aimed at disabled and older people to promote the availability of the for sale wheelchair accessible flats.

Further advice on accessible housing is contained in the Housing Supplementary Planning Guidance see www.london.gov. uk/priorities/planning/publications/ housing-supplementary-planningguidance

8. Have you:

- a suitably qualified independent access consultant;
- consulted with the local access officer and access group and older peoples forum (where available);
- established a project specific consultative access group (CAG) to

consider, review and comment upon access and inclusive design issues

Plans, maps and illustrations which further explain the above specific points will be welcomed within the Design and Access Statement. Given the interest from organisations of disabled people in the planning process you should bear in mind the need to ensure that your statement can be made available in alternative formats if requested.

Appendix 5: Technical standards

- Access For All: UEFA and CAFE Good Practice Guide to Creating an Accessible Stadium and Matchday Experience, UEFA, 2011

- Access for All design guide, Environment Agency, 2012

- Accessible sports facilities design guide , Sport England, 2010

- The Accessible Office: designing the inclusive workplace, JMU Access Partnership, 2005

- Accessible Stadia – A good practice guide to the design of facilities to meet the needs of disabled spectators and other users, The Football Stadia Improvement Fund/The Football Licensing Authority, 2003

- The Building Regulations 2010, Approved Document M: Access to and use of buildings (2013 edition), NBS, 2013

- The Building Regulations 2010, Approved Document Part K: Protection from falling, collision and impact, NBS, 2013

- BS 8300:2009 + A1: 2010 Design of buildings and their approaches to meet the needs of disabled people – Code of practice, British Standards Institution, 2010

- BS 9266:2013: Design of accessible and adaptable general needs housing. Code of practice, British Standards Institution, 2013

- Building Bulletin 93: Acoustic Design of Schools, Department for Education and Skills, 2002

- Building Bulletin 102: Designing for disabled children and children with special educational needs, Department for Children Schools and Families , 2008

- Building Sight, Peter Barker, Jon Barrick and Rod Wilson, RNIB/HMSO, 1995

- Changing Places: the practical guide, Changing Places Consortium, 2014

- The Design of Streets with Older People in Mind, I'DGO, 2012

- Designing for Accessibility, by Alison Grant, CAE/RIBA Publishing, 2012

- Easy Access to Historic Buildings, English Heritage, 2012

- Easy Access to Historic Landscapes, English Heritage, 2013

- Inclusive Mobility: A guide to best practice on access to pedestrian and transport infrastructure, by Philip R Oxley, Department for Transport, 2002

- Good Loo Design Guide, by Andrew Lacey, CAE/RIBA Publishing, 2004

- Guidance on use of tactile paving surfaces, Department of Transport, 1998

- Lifetime Homes, The Foundation for Lifetime Homes and Neighbourhoods, 2010

- Sign Design Guide – a guide to inclusive signage, by Peter Barker and June Fraser, RIBA /Sign Design Society, 2000

- Manual for Streets, Department for Transport, 2007

- Manual for Streets 2 – Wider Application of the Principles, a companion guide to Manual for Streets, Chartered Institution of Highways and Transportation, 2010

- Wheelchair Housing Design Guide 2nd Edition by Stephen Thorpe and Habinteg Housing Association, BRE Press 2006

Appendix 6: Summary of the Quality and Design Standards from the Housing SPG

Design Standards		Classification	Source
1.0	**Shaping Good Places**		
1.1	**Defining places**		
1.1.1	Development Proposals should demonstrate: a. how the design responds to its physical context, including the character and legibility of the area and the local pattern of building, public space, landscape and topography. b. how the scheme relates to the identified character of the place and to the local vision and strategy or how bolder change is justified in relation to a coherent set of ideas for the place expressed in the local vision and strategy or agreed locally.	Baseline	LP Policy 7.4 and Building For Life
1.1.2	Development proposals should demonstrate: a. how the scheme complements the local network of public spaces, including how it integrates with existing streets and paths. b. how public spaces and pedestrian routes are designed to be overlooked and safe, and extensive blank elevations onto the public realm at ground floor have been avoided. c. or larger developments, how any new public spaces including streets and paths are designed on the basis of an understanding of the planned role and character of these spaces within the local movement network, and how new spaces relate to the local vision and strategy for the area.	Baseline	LP Policy 7.5 (also 7.3, 5.10, 6.9 and 6.10) and Building for Life
1.2	**Outdoor spaces**		
1.2.1	Development proposals should demonstrate that they comply with the borough's open space strategies, ensuring that an audit of surrounding open space is undertaken and that, where appropriate, opportunities to help address a deficiency in provision by providing new public open spaces are taken forward in the design process.	Baseline	LP Policy 2.18 and Building for Life

1.2.2	For developments with a potential occupancy of ten children or more, development proposals should make appropriate play provision in accordance with the LP SPG, Providing for Children and Young People's Play and Informal Recreation.	Baseline	LP Policy 3.6 Building for Life
1.2.3	Where communal open space is provided, development proposals should demonstrate that the space: a. is overlooked by surrounding development; b. is accessible to wheelchair users and other disabled people; c. is designed to take advantage of direct sunlight; d. has suitable management arrangements in place.	Baseline	LP Policy 2.18 and Building for Life
2.0	**Housing for a Diverse City**		
2.1	**Appropriate density**		
2.1.1	Development proposals should demonstrate how the density of residential accommodation satisfies LP policy relating to public transport accessibility levels (PTALs) and the accessibility of local amenities and services, and is appropriate to the location in London.	Baseline	LP Policy 3.4 and Building for Life
2.2	**Residential mix**		
2.2.1	Development proposals should demonstrate how the mix of dwelling types and sizes and the mix of tenures meet strategic and local borough targets and are appropriate to the location in London.	Baseline	LP Policy 3.8 (also 3.10) and Building for Life
3.0	**From Street to Front Door**		
3.1	**Entrance and approach**		
3.1.1	All main entrances to houses, ground floor flats and communal entrance lobbies should be visible from the public realm and clearly identified.	Baseline	Building for Life
3.1.2	The distance from the accessible car parking space of requirement 3.3.4 to the home or to the relevant block entrance or lift core should be kept to a minimum and should be level or gently sloping [Lifetime Homes Criterion 2].	Baseline	Lifetime Homes Criterion 2
3.1.3	The approach to all entrances should preferably be level or gently sloping [Lifetime Homes Criterion 3].	Baseline	Lifetime Homes Criterion 3

3.1.4	All entrances should be illuminated and have level access over the threshold, Entrance doors should have 300mm of clear space to the pull side, and clear minimum opening widths of 800mm or 825mm depending on the direction and width of approach. Main entrances should have weather protection and a level external landing [Lifetime Homes Criterion 4].	Baseline	Lifetime Homes Criterion 4
3.2	**Shared circulation within buildings**		
3.2.1	The number of dwellings accessed from a single core should not exceed eight per floor, subject to dwelling size mix.	Good practice	Design for Homes/ Secured by Design
3.2.2	An access core serving 4 or more dwellings should provide an access control system with entry phones in all dwellings linked to a main front door with electronic lock release. Unless a 24 hour concierge is provided, additional security measures including audio-visual verification to the access control system should be provided where any of the following apply: i. more than 25 dwellings are served by one core; or ii. the potential occupancy of the dwellings served by one core exceeds 100 bed spaces; or iii. more than 8 dwellings are provided per floor.	Baseline	Secured by Design
3.2.3	Where dwellings are accessed via an internal corridor, the corridor should receive natural light and adequate ventilation where possible.	Baseline	Design for London
3.2.4	The minimum width for all paths, corridors and decks for communal circulation should be 1200mm. The preferred minimum width is 1500mm, and is considered particularly important where corridors serve dwellings on each side ('double loaded') and where wheelchair accessible dwellings are provided.	Baseline	Lifetime Homes guidance
3.2.5	For buildings with dwellings entered from communal circulation at the first, second or third floor where lifts are not provided, space should be identified within or adjacent to the circulation cores for the future installation of a wheelchair accessible lift.	Good Practice	DD266

3.2.6	All dwellings entered at the fourth floor (fifth storey) and above should be served by at least one wheelchair accessible lift, and it is desirable that dwellings entered at the third floor (fourth storey) are served by at least one such lift. All dwellings entered at the seventh floor (eighth storey) and above should be served by at least two lifts.	Baseline	Design for London
3.2.7	Every designated wheelchair accessible dwelling above the ground floor should be served by at least one wheelchair accessible lift. It is desirable that every wheelchair accessible dwelling is served by more than one lift.	Baseline	Wheelchair Housing Design Guide
3.2.8	Principal access stairs should provide easy access* regardless of whether a lift is provided. Where homes are reached by a lift, it should be fully wheelchair accessible [Lifetime Homes Criterion 5].	Baseline	Lifetime Homes Criterion 5
3.3	**Car parking**		
3.3.1	Standard 3.3.1 (and Policy 6.13) - All developments should conform to LP policy on car parking provision (see Annex 2.3 of this SPG for guidance on implementation of relevant policy including LP Policy 6.13 and associated standards below). In areas of good public transport accessibility and/or town centres the aim should be to provide no more than one space per dwelling. Elsewhere parking provision should be broadly as follows, depending on location as indicated in Annex 2.4: a. 4+ bedroom dwellings: 1.5 - 2 spaces per dwelling b. 3 bedroom dwellings: 1 - 1.5 spaces per dwelling c. 1 - 2 bedroom dwellings: Less than 1 per dwelling	Baseline	LP Policy 6.13
3.3.2	Each designated wheelchair accessible dwelling should have a car parking space 2400mm wide with a clear access way to one side of 1200mm. **	Baseline	DD266 and Wheelchair Housing Design Guide
3.3.3	Careful consideration should be given to the siting and organisation of car parking within an overall design for open space so that car parking does not negatively affect the use and appearance of open spaces.	Baseline	Building for Life

3.3.4	Where car parking is within the dwelling plot, at least one car parking space should be capable of enlargement to a width of 3300mm. Where parking is provided in communal bays, at least one space with a width of 3300mm should be provided per block entrance or access core in addition to spaces designated for wheelchair user dwellings [Lifetime Homes Criterion 1].	Baseline	Lifetime Homes Criterion 1
3.4	**Cycle storage**		
3.4.1	All developments should provide dedicated storage space for cycles at the following levels: i. 1 per 1 or 2 bedroom dwelling; or ii. 2 per 3 or more bedroom dwelling	Baseline	LP Policy 6.9
3.4.2	Individual or communal cycle storage outside the home should be secure, sheltered and adequately lit, with convenient access to the street. Where cycle storage is provided within the home, it should be in addition to the minimum GIA and minimum storage and circulation space requirements. Cycle storage identified in habitable rooms or on balconies will not be considered acceptable.	Baseline	Design for London
3.5	**Refuse, post and deliveries**		
3.5.1	Communal refuse and recycling containers, communal bin enclosures and refuse stores should be accessible to all residents including children and wheelchair users, and located on a hard, level surface. The location should satisfy local requirements for waste collection and should achieve full credits under the Code for Sustainable Homes Technical Guide. Refuse stores within buildings should be located to limit the nuisance caused by noise and smells and provided with means for cleaning.	Baseline	LP Policy 5.17 and Code for Sustainable Homes
3.5.2	Storage facilities for waste and recycling containers should be provided in accordance with the Code for Sustainable Homes Technical Guide and local authority requirements.	Baseline	LP Policy 5.17 and Code for Sustainable Homes

4.0	**Dwelling Space Standards**		
4.1	**Internal floor area**		
4.1.1	All developments should meet the following minimum space standards (as set out in Table 3.3 of the replacement LP):	Baseline	LP Policy 3.5 and proposed HCA standards

	Dwelling type (bedroom/ persons)	Essential GIA (sq.m)
Flats	1p	37
	1b2p	50
	2b3p	61
	2b4p	70
	3b4p	74
	3b5p	86
	3b6p	95
	4b5p	90
	4b6p	99
Two Storey Houses	2b4p	83
	3b5p	96
	4b5p	100
	4b6p	107
Three Storey Houses	3b5p	102
	4b5p	106
	4b6p	113

	For dwellings designed for more than 6 people, at least 10sq.m gross internal area should be added for each additional person.		
4.1.2	Dwelling plans should demonstrate that dwellings will accommodate the furniture, access and activity space requirements relating to the declared level of occupancy.	Baseline	HCA Housing Quality Indicator standards
4.2	**Flexibility and adaptability**		
4.2.1	Dwelling plans should demonstrate that dwelling types provide flexibility by showing that at least one bedroom is capable of being used and furnished as either a double or a twin room according to occupiers' preferences.	Baseline	LP Policy 7.2

4.3	**Circulation in the home**		
4.3.1	The minimum width of hallways and other circulation spaces inside the home should be 900mm. This may reduce to 750mm at 'pinch points' e.g. next to radiators, where doorway widths meet the following specification: 	**Minimum clear opening width of doorway (mm)**	**Minimum width of hallway where door is in side wall (mm)**
---	---
750	1200
775	1050
900	900 | Where a hallway is at least 900mm wide and the approach to the door is head-on, a minimum clear opening door width of 750mm should be provided [Lifetime Homes Criterion 6].	Baseline	Lifetime Homes Criterion 6
4.3.2	The design of dwellings of more than one storey should incorporate potential for a stair lift to be installed and a suitable identified space for a through-the-floor lift from the entrance level*** to a storey containing a main bedroom and an accessible bathroom [Lifetime Homes Criterion 12].	Baseline	Lifetime Homes Criterion 12
4.4	**Living / dining / kitchen**		
4.4.1	The following combined floor areas for living / kitchen / dining space should be met: 	**Designed level of occupancy**	**Minimum combined floor area of living, dining and kitchen spaces (sq.m)**
---	---
2 person	23
3 person	25
4 person	27
5 person	29
6 person	31		Good Practice	HATC

4.4.2	The minimum width of the main sitting area should be 2.8m in 2-3 person dwellings and 3.2m in dwellings designed for four or more people.	Good Practice	Design for London
4.4.3	Dwellings for five people or more should be capable of having two living spaces, for example a living room and a kitchen-dining room. Both rooms should have external windows. If a kitchen is adjacent to the living room, the internal partition between the rooms should not be load-bearing, to allow for reconfiguration as an open plan arrangement. Studies will not be considered as second living spaces.	Good Practice	Design for London
4.4.4	There should be space for turning a wheelchair in dining areas and living rooms and basic circulation space for wheelchairs elsewhere [Lifetime Homes Criterion 7].	Baseline	Lifetime Homes Criterion 7
4.4.5	A living room, living space or kitchen dining room should be at entrance level*** [Lifetime Homes Criterion 8].	Baseline	Lifetime Homes Criterion 8
4.4.6	Windows in the principal living space should be no higher than 800mm above finished floor level (+/- 50mm) to allow people to see out while seated. At least one opening window should be easy to approach and operate by people with restricted movement and reach. [Lifetime Homes Criterion 15].	Baseline	Lifetime Homes Criterion 15
4.5	**Bedrooms**		
4.5.1	The minimum area of a single bedroom should be 8 sq m. The minimum area of a double or twin bedroom should be 12 sq m.	Good Practice	Based on HCA Housing Quality Indicator standards
4.5.2	The minimum width of double and twin bedrooms should be 2.75m in most of the length of the room.	Good Practice	Design for London
4.5.3	In homes of two or more storeys with no permanent bedroom at entrance level***, there should be space on the entrance level that could be used as a convenient temporary bed space [Lifetime Homes Criterion 9].	Baseline	Lifetime Homes Criterion 9
4.5.4	Building structure above a main bedroom and an accessible bathroom should be capable of supporting a ceiling hoist and the design should allow for a reasonable route between this bedroom and bathroom [Lifetime Homes Criterion 13].	Baseline	Lifetime Homes Criterion 13

4.6	**Bathrooms and WCs**		
4.6.1	Dwellings designed for a potential occupancy of five or more people should provide a minimum of one bathroom with WC and one additional WC. **	Good Practice	HCA Housing Quality Indicator standards
4.6.2	Where there is no accessible bathroom at entrance level***, a wheelchair accessible WC with potential for a shower to be installed should be provided at entrance level ∞ [Lifetime Homes Criterion 10]. **	Baseline	Lifetime Homes Criterion 10
4.6.3	An accessible bathroom should be provided in every dwelling on the same storey as a main bedroom [Lifetime Homes Criterion 14]. **	Baseline	Lifetime Homes Criterion 14
4.6.4	Walls in bathrooms and WCs should be capable of taking adaptations such as handrails † [Lifetime Homes Criterion 11]. **	Baseline	Lifetime Homes Criterion 11
4.7	**Storage and utility**		
4.7.1	In dwellings supported by the LDA or receiving public subsidy, built-in general internal storage space free of hot water cylinders and other obstructions, with a minimum internal height of 2m and a minimum area of 1.5 sq m should be provided for 1 and 2 person dwellings, in addition to storage provided by furniture in habitable rooms. For each additional occupant an additional 0.5 sq.m of storage space is required. Private sector dwellings should ensure this minimum area (1.5 sq m) either within the dwelling itself or elsewhere within its curtilage provided minimum internal provision includes storage space free of hot water cylinders and other obstructions with a minimum internal height of 2m and a minimum area of 0.8 sq.m for 1 and 2 person dwellings, in addition to storage provided by furniture in habitable rooms. For each additional occupant an additional 0.5 sq m of storage space is required.	Baseline	HCA Housing Quality Indicator standards
4.8	**Study and work**		
4.8.1	Dwelling plans should demonstrate that all homes are provided with adequate space and services to be able to work from home. The Code for Sustainable Homes guidance on working from home is recommended as a reference.	Baseline	Code for Sustainable Homes

4.8.2	Service controls should be within a height band of 450mm to 1200mm from the floor and at least 300mm away from any internal room corner [Lifetime Homes Criterion 16].	Baseline	Lifetime Homes Criterion 16
4.9	**Wheelchair accessible dwellings**		
4.9.1	Ten percent of new housing should be designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users in accordance with the GLA Best Practice Guide on Wheelchair Accessible Housing.	Baseline	LP Policy 3.8
4.10	**Private open space**		
4.10.1	A minimum of 5 sq m of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sq m should be provided for each additional occupant.	Baseline	HCA Housing Quality Indicator standards
4.10.2	Private outdoor spaces should have level access from the home ‡ [Lifetime Homes Criterion 4].	Baseline	Based on Lifetime Homes
4.10.3	The minimum depth and width of all balconies and other private external spaces should be 1500mm.	Baseline	HCA Housing Quality Indicator standards
5.0	**Home as a Place of Retreat**		
5.1	**Privacy**		
5.1.1	Design proposals should demonstrate how habitable rooms within each dwelling are provided with an adequate level of privacy in relation to neighbouring property and the street and other public spaces.	Baseline	Secured by Design
5.2	**Dual aspect**		
5.2.1	Developments should avoid single aspect dwellings that are north facing, exposed to noise levels above which significant adverse impacts on health and quality of life occur, or contain three or more bedrooms.	Baseline	LP Policy 3.5, PPG 24
5.3	**Noise**		
5.3.1	The layout of adjacent dwellings and the location of lifts and circulation spaces should seek to limit the transmission of noise to sound sensitive rooms within dwellings.	Baseline	LP Policy 7.15, PPG 24
5.4	**Floor to ceiling heights**		
5.4.1	The minimum floor to ceiling height in habitable rooms should be 2.5m between finished floor level and finished ceiling level.	Baseline	Design for London

5.5	**Daylight and sunlight**		
5.5.1	Glazing to all habitable rooms should be not less than 20% of the internal floor area of the room.	Good Practice	Code for Sustainable Homes
5.5.2	All homes should provide for direct sunlight to enter at least one habitable room for part of the day. Living areas and kitchen dining spaces should preferably receive direct sunlight.	Good Practice	Code for Sustainable Homes
5.6	**Air quality (new standard ex LP EIP)**		
5.6.1	Minimise increased exposure to existing poor air quality and make provision to address local problems of air quality : be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas (AQMAs).	Baseline	LP policy 7.14, Code for Sustainable Homes,
6.0	**Climate Change Mitigation and Adaptation**		
6.1	**Environmental performance**		
6.1.1	Designers should seek to achieve a minimum of Level 4 of the Code for Sustainable Homes in all new developments.	Good Practice	Code for Sustainable Homes
6.1.2	All homes should satisfy LP policy on sustainable design and construction and make the fullest contribution to the mitigation of and adaptation to climate change.	Baseline	LP Policy 5.3
6.2	**Energy and CO2**		
6.2.1	Development proposals should be designed in accordance with the LP energy hierarchy, and should meet the following minimum targets for carbon dioxide emissions reduction. Year Improvement on 2010 Building Regulations 2010 - 2013 25 per cent 2013 - 2016 40 per cent 2016 - 2031 Zero carbon	Baseline	LP Policy 5.2
6.3	**Overheating**		
6.3.1	Development proposals should demonstrate how the design of dwellings will avoid overheating during summer months without reliance on energy intensive mechanical cooling systems.	Baseline	LP Policy 5.9

6.4	Water		
6.4.1	New dwellings should be designed to ensure that a maximum of 105 litres of water is consumed per person per day.	Baseline	LP Policy 5.15
6.4.2	Where development is permitted in an area at risk of flooding, it should incorporate flood resilient design in accordance with PPS25.	Baseline	LP Policy 5.12
6.4.3	New development should incorporate Sustainable Urban Drainage Systems and green roofs where practical with the aim of achieving a Greenfield run-off rate, increasing bio-diversity and improving water quality. Surface water run-off is to be managed as close to source as possible.	Baseline	LP Policies 5.11 and 5.13
6.5	Materials		
6.5.1	All new residential development should accord with Code for Sustainable Homes Level 4 and the London Sustainable Design and Construction SPG with regard to the sourcing of materials.	Good Practice	Code for Sustainable Homes
6.5.2	All new residential development should meet the requirements of the Code Level 4 with regard to using materials with lower environmental impacts over their lifecycle.	Baseline	Code for Sustainable Homes and LP 5.3
6.6	Ecology		
6.6.1	The design and layout of new residential development should avoid areas of ecological value and seek to enhance the ecological capital of the area in accordance with GLA best practice guidance on biodiversity and nature conservation.	Baseline	LP Policy 7.19

*   In the Lifetime Homes Criteria a stair providing easy access is defined as one having maximum risers of 170mm, minimum goings of 250mm and a minimum width of 900mm measured 450mm above the pitch line.

**   Refer to the GLA Best Practice Guidance on Wheelchair Accessible Housing for specific guidance on design standards for wheelchair accessible dwellings

***   In the Lifetime Homes Criteria the entrance level of a dwelling is generally deemed to be the storey containing the main entrance door. Where there are no rooms on the storey containing the main entrance door (e.g. flats over garages or shops and some duplexes and townhouses) the first storey level containing a habitable or non-habitable room can be considered the entrance level, if this storey is reached by a stair providing 'easy access', as defined above.

‡   Balconies and terraces over habitable rooms which require a step up to increase slab thickness / insulation are exempt from the Lifetime Homes level access standard.

∞   Dwellings over more than one storey with no more than two bedrooms may instead be designed with a Part M compliant WC at entrance level. The WC should provide a floor drain to allow for an accessible shower to be installed at a later date.

†   Adequate fixing and support for grab rails should be available at any location on all walls within a height band of 300mm – 1800mm from the floor.

Appendix 7: Design considerations for Wheelchair Accessible Housing from the Housing SPG

Design Considerations for Wheelchair Accessible Housing

1. Moving around outside

Ensure a high degree of accessibility within the development.

Convenient access should be available throughout the development, connecting community facilities and public transport beyond the site to the site entrance, to all dwelling entrances and site facilities such as gardens, gyms, and play space [1]. Wheelchair accessible homes are best sited close to public transport, car parking, taxi drop-off, and to communal facilities.

Footpaths - Ensure that footpaths are smooth, slip resistant, at least 1200mm minimum wide with adequate space to negotiate obstacles, turn and pass (WHDG 1.2.1).

Gradients - Ensure that length to gradient ratios of footpaths and other routes do not exceed 2000mm at 1 in 12 and 5000mm at 1 in 15. Interpolation between these figures is acceptable. Where required, intermediate level landings should be at least 1200mm long (WHDG 1.2.3). Routes to entrances should not be steeper than 1 in 15 (WHDG 3.2.5).

Cross falls - Ensure that cross falls to paving do not exceed 1 in 50, whether paving is dedicated to pedestrian use or shared with vehicles (WHDG 1.2.4).

Crossings - Ensure that crossings have flush junctions or shallow gradients. Avoid gratings and channels that could trap wheels or footrests. (WHDG 1.2.5)

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1 Inclusive Mobility. Department of Transport 2002

2. Using outdoor spaces

Ensure that spaces within the curtilage of the home are accessible, usable and secure.

Gardens - Provide an accessible route between the external door, external storage and external gate (WHDG 2.2.3). Where private back or side gardens are provided, ensure that gates have an 850mm clear opening and can be operated from each side (WHDG 2.2.1).

Balconies - Provide level access to balconies and useable space clear of any door swings (WHDG 2.2.2).

Refuse - Make suitable provision for refuse and recycling containers within a short distance of an external door, or ensure appropriate management provision (WHDG 2.2.4).

3. Approaching the home

Ensure ease of approach to the home by car, wheelchair or mobility scooter with cover at the point of transfer, and protection from the elements at the individual or common entrance.

The parking strategy, including the provision and dimensions of bays, the management of the supply and future demand for bays and how their use will be enforced should be made clear in the Design and Access Statement. Designers should refer to BS 8300: 2009 + A1:2010 for guidance about common areas of multi-storey developments, including circulation areas, doors, lifts and parking. Suitable designated parking spaces should be as close as possible to wheelchair accessible dwellings and ideally under cover.

Dwellings with a direct external entrance - Provide a parking space (ideally covered) for every wheelchair user dwelling

(WHDG 3.2.1). Ensure that minimum clear dimensions are 3600mm wide x 5400mm long x 2200mm high and the parking area is paved with a slip resistant, smooth and level surface. (WHDG 3.2.2)

Dwellings with a communal external entrance - Where there is no direct external ground-floor entrance, ensure parking provision in the form of designated parking space for each wheelchair user dwelling, off-street or kerbside, nominally level that can enable transfer to and from vehicle (WHDG 3.2.3).

Ensure a smooth, slip resistant route to dwelling entrances. Ramps, where unavoidable, are not steeper than 1 in 15 and not longer than 5000mm (WHDG 3.2.5).

Entrance landing - Provide a level landing 1500mm x 1500mm, 1800mm by 1800mm is preferred. Ensure a 1200mm depth clear of any door swing. Provide side protection where the ground level is below the path or landing level (WHDG 3.2.6).

Canopy at entrance – Provide a canopy of minimum dimensions 1200mm x 1500mm extending beyond the door on the lock side and at a maximum height of 2300mm (WHDG 3.2.7).

Lifts - Where wheelchair dwellings are above the ground floor, lifts should be as detailed in BS 8300: 2010 (internal car dimensions of 1100mm wide by 1400mm deep). A second lift should preferably be accessible to and from wheelchair user dwellings for use when the first or core lift is undergoing maintenance. (WHDG 3.2.9)

4. Negotiating the entrance door

Ensure that the clear opening, approach space and threshold are wheelchair accessible.

Door - Provide easy to use doors with, effective clear opening width of at least 800mm (WHDG 4.2.1). Designers should consider increasing this to 900mm or wider, particularly in relation to communal doors.

Approach space - Provide a minimum 200mm space beside the leading edge of the entrance door for a door opening away from the wheelchair user and 300mm for a door opening towards a wheelchair user, extending 1800mm from face of door (WHDG 4.2.2).

Threshold - Provide a weather tight accessible detail (i.e. a tapered or chamfered external profile) with a total upstand not exceeding 15mm. (WHDG 4.2.3)

5. Entering and leaving; dealing with callers

Ensure that the wheelchair user can:

- *enter the dwelling, manoeuvre an outdoor chair to allow transfer to an indoor chair, and reverse the process when leaving;*
- *leave the outdoor or indoor chair on charge;*
- *approach the entrance door to receive deliveries, retrieve post, open the door to visitors, manoeuvre, and return into living areas.*

Lobby - Where there is an entrance lobby or inner door, ensure there is adequate space to manoeuvre between doors (WHDG 5.2.5).

Turning space - Provide a turning space of 1800mm deep x 1500mm wide behind the closed door, clear of fittings and obstructions, and a 300mm clear space to the side of the leading edge of the door (WHDG 5.2.2).

Transfer space - Provide 1100mm deep x 1700mm wide space to transfer to a second wheelchair, to store the first clear of circulation routes and to approach furniture and doors (WHDG 5.2.1). The space should include an electrical socket to allow batteries to be recharged.

6. Negotiating the secondary door

Ensure a direct connection to external spaces by an easily operated, secure door, to provide access to private or shared gardens or balconies, and as an escape route in an emergency.

External landing - Provide a nominally level landing 1500mm wide x 1500mm deep with a 1200mm space clear of the door swing (WHDG 6.2.1).

Door - Provide effective clear width of 800mm to single or main leaf (WHDG 6.2.2).

Approach space - Ensure there is adequate space to approach, manoeuvre and pass through the door on line (WHDG 6.2.3).

Threshold - Provide weather-tight, accessible detail (WHDG 6.2.4).

7. Moving around inside; storing things

Ensure that wheelchair users can:

- *conveniently manoeuvre, approach and negotiate all doors within circulation areas*
- *approach and use storage off circulation areas.*

Open plan living room/kitchens can be more convenient because there are fewer doors to negotiate but designers should consider the noise from kitchen appliances. Radiators should not constrain circulation.

Straight passages - Ensure that passage widths or approaches, where no turning or door approach is required, are no less than

900mm wide clear of all obstructions except skirtings (WHDG 7.2.1).

Head-on approach to doors in passages - Ensure space beside latch edge of door, minimum 200mm on push side and minimum 300mm on pull side (WHDG 7.2.2).

Turning 90° - Ensure at right angles that passage width clear of all obstructions (except skirting) for the extent the turn is no less than 1200mm width in one direction, and 900mm in the other; or 900mm in each direction in combination with an angle splayed by 300mm (WHDG 7.2.5).

Turning 180° - Ensure that passage widths or approaches to turn through 180° are no less than 1500mm clear of all obstructions (except skirting) for extent of manoeuvring space. (WHDG 7.2.4)

Effective clear widths for doors - Ensure 775mm minimum effective clear width. Increase where approach is at an angle (WHDG 7.2.6). Effective clear width[2] of doors refers to the width between the face of the door or projecting fitting in the open position and the nearest point on the opposite frame or second door.

Doors at angles - Provide space to turn between doors at an angle to each other (At least 400mm from door to corner) (WHDG 7.2.8).

Sliding doors - Provide space beyond doorway at latch side for sideways approach and operation (300mm minimum) (WHDG 7.2.9).

Storage - Ensure that the depth and width of storage space, in combination with any shelving layout, provides optimum access to space and other stored items. Ensure that opening width of doors suits angled or head-on approach (WHDG 7.2.10).

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2   See Lifetime Home standards for definition of effective clear widths

8. Moving between levels within the dwelling

Ensure that there is provision in dwellings on more than one floor for independent movement in a wheelchair between floors, without the need to transfer, without compromising circulation or living space, and with all the rooms remaining accessible.

Through the floor lift - Provide a soft pocket or structural opening of adequate size to enable the installation of a through-the-floor lift connecting a circulation space on the entrance level with a circulation space on the level of the main bedroom. The space could be used for easily removable storage until the lift is installed, provided enough storage is provided elsewhere.

Circulation - Provide adequate circulation space at each level to manoeuvre, call the lift, approach and open the lift door (WHDG 8.2.3).

9. Using living spaces

A room should accommodate the usual range of furniture with space for a wheelchair user to circulate and transfer from wheelchair to seat (see WHDG page 14 for basic criteria for space required for room layouts).

Room layout - Provide space for wheelchair users to approach furniture, circulate around it, transfer to seating and approach and operate doors, windows, equipment and controls (WHDG 9.2.1).

10. Using the kitchen

Ensure ease of approach to and use, from a wheelchair, of the sink, worktops, equipment, all appliances and controls and all storage essential to kitchen operations.

The kitchen should have sufficient space between the units to enable a wheelchair user to manoeuvre freely and safely.

Position the hob, oven housing and sink on the same run of units uninterrupted by doors, windows or main circulation routes. Windows should be operable from a wheelchair. Accessible storage capacity should be retained following future changes to provide clear knee space underneath the sink, hob or oven housing.

Layout - Provide clear manoeuvring space not less than 1800mm x 1500mm (WHDG 10.2.1).

11. Using the bathroom

The design of the bathroom is key to enabling independence and dignity for disabled people. The ability to manage toileting and bathing functions without assistance is highly desirable. See WHDG section 11 for the spatial requirements of bathrooms.

Bathroom Layout - Ensure independent approach and safe transfer to and use of all fittings, including manoeuvring space clear of fittings and door swings (WHDG 11.2.4) with flexible or easily adapted services (WHDG 11.2.1).

Bath - Where provided select bath and taps position and detail to allow a range of transfers, access to and operation of taps (WHDG 11.2.7).

Level-access shower - Where installed, detail to be fully accessible comprising drained floor, reachable and usable controls and scope for suitable water containment or suitable enclosure (WHDG 11.2.6). A shower area 1200 x 1200mm is more convenient than an area 1000 by 1000mm. Under-floor heating dries the floor quickly, improving safety.

WC - Provide space to approach WC head-on, obliquely or to make a side-transfer (11.2.5).

Supports - Ensure that walls and ceiling are

adequate for adjustable height basins and subsequent fixing of hoists, seats, supports and other fittings to suit user (WHDG 11.2.10).

Access from bedroom - A full height knock-out panel allows for direct access from main bedroom to bathroom or to the en-suite bathroom and the installation of a ceiling-mounted hoist (WHDG 11.2.2).

Second WC - In dwellings of four or more persons, provide fully accessible second WC with basin. The side transfer space should be on opposite sides to provide both left and right-handed transfer options within the dwelling (WHDG 11.2.3).

12.   Using bedrooms

Ensure that there is space in all bedrooms to accommodate the normal range of bedroom furniture and for a wheelchair user to enter approach and transfer to beds, approach and use other furniture and operate windows.

Layouts - Provide bedroom layouts to ensure access to both sides of beds in double bedrooms and outer side of beds in single bedrooms, access to other furniture and to window (WHDG 12.2.1 and page 14 for basic criteria for space required for room layouts).

Door - Make provision for connection between main bedroom and bathroom by means of full-height knock-out panel, a door with panel over in full-height frame or fully detailed door (WHDG 12.2.3).

Hoist - Make provision for future ceiling track hoist installation in main bedroom - strengthen ceiling to allow run into bathroom (WHDG 12.2.4).

13.   Internal doors

All internal doors, including those to storage spaces, can be operated conveniently.

Construction - Ensure that door construction permits subsequent fixing of pull handles or other fittings to suit individual requirements (WHDG 13.2.1).

14.   Windows

Ensure independent control of opening windows, passive and mechanical ventilation and a balance of daylight, views out, privacy and security. Where windows extend to floor level consider radiator location to ensure they do not reduce circulation space or restrict furniture location.

Approach - Ensure that a wheelchair user can approach each window to operate controls for opening and ventilation (WHDG 14.2.1).

Transoms - Avoid full-width transoms (horizontal divisions) between 800 and 1500mm high (WHDG 14.2.6).

15.   Service Controls

Ensure wheelchair users can reach, control and read mains water stopcocks, gas and electricity mains switches and consumer units.

Appendix 8: Shopmobility Schemes in and around London

Area	Organisation name	Type of service	Nat Fed Affil.	Address
Bexley Heath	Bexley Heath Shopmobility	Fixed	N	The Broadway Shopping Centre
Brent Cross	Brent Cross Shopmobility	Fixed, retail development based	Y	Brent Cross Shopping Centre
Bromley	Bromley Shopmobility	Fixed	N	The Glades Car Park, High Street
Camden	Camden Shopmobility	Fixed	Y	29a Pratt Street Camden
Camden	Camden ScootAbility	Mobile/ delivery	N	Delivery borough wide
Croydon	Croydon Shopmobility	Fixed	N	Whitgift Shopping Centre car park
Ealing	Shopmobility Ealing	Fixed	Y	The Arcadia Centre, Ealing
Edmonton	Edmonton Shopmobility	Fixed	Y	4 Monmouth Rd, Edmonton
Enfield	Enfield Shopmobility	Fixed	N	Civic Centre, Enfield
Epsom	Epsom and Ewell Shopmobility	Fixed	N	Ashley Centre Car Park
Harringey	Harringey Mobile Unit	Mobile/ delivery	Y	Delivery borough wide
Harrow	Harrow and Wealdstone Shopmobility	Fixed	N	37 St George's Centre
Hillingdon	Hillingdon Shopmobility	Fixed	N	Chimes Shopping Centre
Hounslow	Hounslow Shopmobility	Fixed	N	Blenheim Centre, Prince Regent Rd
Ilford	Redbridge Disability Association	Fixed	N	The Exchange Mall, High Rd

Area	Organisation name	Type of service	Nat Fed Affil.	Address
Islington	ScootAbility	Mobile	N	Delivery borough wide
Kensington and Chelsea	Kensington and Chelsea Shopmobility 'out and about'	Fixed, mobile/ delivery and flexible	Y	240 Acklam Road
Kingston upon Thames	Kingston upon Thames Shopmobility	Fixed	N	Eden Walk Car park
Lewisham	Lewisham Shopmobility	Fixed	Y	The Lewisham Centre
Merton, S Wimbledon	ScootAbility	Mobile/ delivery	Y	Delivery borough wide
Orpington	Orpington Shopmobility	Fixed	Y	247 High St
Romford	Havering Shopmobility Liberty Shopping Centre	Fixed	N	South Mall, Liberty Shopping Centre
Romford	Havering Shopmobility Romford the Brewery	Fixed	N	1 The Brewery, Waterloo Road
Staines	Staines Shopmobility	Fixed	N	Unit S1, Two Rivers Retail Park
Sutton	Sutton Shopmobility	Fixed	N	St. Nicholas Centre Car Park/St. Nicholas Centre
Stratford Westfield	Shopmobility	Fixed, retail development based	N	Westfield Stratford City
Walthamstow	Live Ability Waltham Forest	Fixed	N	45 Selbourne Walk
Wandsworth	Wandsworth Shopmobility	Fixed	Y	45 Garrett Lane
Watford	Watford Shopmobility	Fixed	N	Ground Floor Church Car Park
Westfield London	Shopmobility	Fixed, retail development based	N	Westfield London, Shephards Bush

Appendix 9: Accessible hotels

'Achieving the highest standards of accessible and inclusive design in hotel developments and providing at least 10% accessible hotel bedrooms.'[1]

Introduction

1   Inclusive travel is a growing market opportunity yet many hotel operators narrowly interpret disability as wheelchair use and fail to integrate accessible rooms into their business model. Yet all disabled and older people should enjoy the same level of access and service provided to all other customers. The aim of this supplementary planning guidance is to encourage all hotel operators to provide an inclusive hotel experience. This requires the whole hotel premises and experience to be welcoming and accessible, achieved through the integration of an appropriate physical environment, room fit-out and equipment and management practices, thereby implementing the London Plan aim of an accessible and inclusive visitor experience for all visitors.

2   Older and disabled people from all over the UK, Europe and North America are travelling more. This has been encouraged by legislation, such as the Disability Discrimination Act and the Equality Act, by a change in attitudes and by rising expectations that full participation in society is being facilitated by the gradual removal of physical and social barriers. London is progressively removing barriers and creating inclusive places. Public buildings and spaces, buses and taxis already provide a very high degree of accessibility, and improvements continue to be made on the Underground and at rail stations.

3   Moreover, inclusive travel is a sizeable market, which is still in expansion. The UK Travel Survey proved that disabled people and their families spent more than £ 1.8 billion on UK travel in 2009. When inbound travel by European and overseas visitors is included, the market grows substantially. In 1993, Touche Ross estimated that 117 million visits to Britain could be generated by disabled travellers, including their travelling companions.[2] The potential was estimated at £22 billion in extra tourism expenditure for Europe overall. In other European countries, inclusive travel is a well recognised market sector, which is often actively promoted.

4   Disabled hotel users and inclusion professionals have raised a number of issues which, if addressed, will greatly facilitate and improve the visitor experience. These can be summarised as:

   •   Hotels should have sufficient provision for disabled people to exercise consumer choice, similarly to any other customer, and choose accommodation on the basis of good service, location, appropriate price, comfort and a dignified experience, which does not set the guest apart.

   •   Disabled visitors have also highlighted the importance of good management policies (such as availability of accurate information at booking) and provision of equipment (such as shower seats or vibrating alarms) to make their hotel experience a comfortable and successful one.

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1   This appendix is a summary of the advice provided in the report Accessible Hotels in London prepared for the GLA by Grant Thornton in March 2010.

2   Touche Ross, Profiting from opportunities, 1993

5   Disabled users have suggested that wheelchair accessibility provides a standard which is of great advantage to many users and should be adopted for all accessible rooms. They have also pointed out that choice (of floor or aspect, double or twin beds, etc.) should be available to them to the same degree as it is for other users.

6   In order to meet the London Plan Policy 4.5 regarding accessible hotel bedrooms, applicants are expected to:

- prepare a Design and Access Statement which is sufficiently detailed to demonstrate that inclusive access is integral to the design and that adequate choice of accessible room types is provided to all customers, whether disabled or not. The Design and Access Statement should cover as a minimum the topics listed below in   7 below.

- prepare and submit with the planning application an Accessibility Management Plan which demonstrates that the management and operation of accessible rooms is considered from the outset of the design.

- use and reference current best practice guidance such as BS8300:2009 + A1:2010 Design of buildings and their approaches to meet the needs of disabled people - code of practice; and Publicly Available Specification PAS 88:2008 Guidance on accessibility of large hotel premises and hotel chains.

- consider the provisions in Part M of the Building Regulations as minimum standards and aim to achieve the highest standards of accessible and inclusive design, as required by London Plan Policy 7.2.

7   Hotel developments in London seeking planning permission should consider as a minimum:

- Adopting a clear and easily understandable layout to the hotel as a whole and to the room itself (for example locating the accessible rooms adjacent to the lift). This will help all visitors to comfortably use the hotel facilities and removes the need for unnecessary assistance.

- Offering an equal standard of use in all public areas of the building, including restaurant tables, breakfast areas, business centre, etc.

- Making dignified provision for common toilets and Changing Places toilets (see www.changing-places.org), refuge and evacuation arrangements.

- Arranging convenient parking to allow easy access to the premises. Provision of blue badge parking bays and convenient car or taxi pick-up/drop off at the front entrance of the hotel with no obstacles or obstructions.

- Choosing best quality finishes and fittings in keeping with the style of the interior décor of the hotel, for example by avoiding hospital style fittings and crude features, whilst of course ensuring safe, useable and comfortable operation.

- Providing choice of room type and location, with the opportunity to have connecting rooms in a proportion of accessible rooms. Offer choice of bath or level access shower and bed type.

- Positioning furniture, switches, mirrors and other devices (such as kettle and cups) in obvious and rational places so that they can be easily reached and safely used and so that they do not obstruct use of other facilities (e.g. furniture

blocking access to the window so it is not possible to pull the curtains at night).

- Incorporating the small and well designed items that can make a big difference such as embossed room numbers, electronic card operated locks, easy to operate and reach room heating controls, or stick holders at restaurant tables;

- Having adequate space and storage for equipment and mobile furniture (some disabled people travel with their own mobile hoist).

- Ensuring that information is available at all stages, pre-booking to arrival and that confirmation of arrangements made at time of booking (including availability of equipment) is provided in writing in advance. Providing detailed information on the accessibility and the services available to disabled people on the main web site including photographs of accessible bedrooms and bathrooms can greatly assist initial booking decisions and avoid unnecessary later complications or disappointment on arrival.

- Training of all staff members in customer care for disabled visitors; personal and appropriate service, in line with what the hotel provides for all guests, is as important as technical solutions.

- Committing to continuous improvement and encouragement of client feedback, particularly from the users of accessible rooms.

Design and access statements

8   The design and access statement for planning applications for all hotel development should as a minimum fulfil the following criteria:

- Demonstrate how the building/

development will embrace inclusive design principles and promote accessibility. Specific reference should be made to the adoption of best practice, including guidance offered by British Standards BS8300:2009 + A1:2010 and PAS 88:2008. If these standards have not been achieved the reasons should be explained in the DAS along with what other measures have been adopted instead to achieve the highest standard of inclusive design.

- State, where the applicant is part of a franchise or hotel group, how the hotel group or franchise design standards/ manual respond to and achieve best practice in hotel accessibility.

- Describe how the hotel layout helps orientation and facilitates independent use without the need for unnecessary assistance.

- State the actual number and rationale for the adopted mix of accessible rooms making up the required 10% and how the chosen room types have been integrated into the hotel business model and expected hotel category.

- State the approach to construction which ensures that fixed or mobile support rails and hoists can be installed and serviced as required. · Illustrate on plan the distribution of the rooms within the development and describe how an adequate choice of room type and location is going to be provided.

- Illustrate on plan the location of ancillary facilities, such as wheelchair accessible toilets and changing places toilets in the public areas, storage space for mobile equipment, etc.

- Illustrate on plan a typical layout of each accessible room type, including 195

furniture, support rails and equipment, wheelchair turning circles, etc. Each plan layout should be accompanied by a brief description of 'fitness for purpose', describing how each room type can facilitate use by disabled people as well as other customers.

• Illustrate on plan the circulation routes and access to all hotel facilities without the need for assistance or unusual routing. • Illustrate on plan the car parking provision, and designated disabled persons parking provision. In accordance with the highest of either the relevant borough standard of the London Plan.

Accessibility management plans

9   Policy 4.5 of the London Plan encourages the preparation of an Accessibility Management Plan (AMP) to ensure that the management and operation of facilities are fully considered at the outset of the design and that accessibility and inclusion are monitored and maintained throughout the life of the development. An AMP is therefore distinct from a DAS, which sets out the physical provision and design rationale. The Accessibility Management Plan should accompany the planning application in a similar way to a Travel Plan and should be modelled on the Access Strategies indicated in PAS 88:2008. The level of detail to be provided by an AMP will depend on the type and scale of development being proposed. For example:

• Where the development is of a significant scale and the future operator is known, policy measures can be specific and guarantee that accessible rooms and facilities are fully integrated in the management practices and the business model of the hotel.

• When the development is significant in scale, but the operator is not known at the time of the planning application, the AMP will describe the assumptions made at the time of the design and development. The submission of additional details prior to occupation should preferably be required as a planning condition and/or legal obligation.

• The approach above could assist franchises, and introduce standardisation within a chain, with only development specific issues included prior to occupation. This will promote guest recognition and expectation of the availability of facilities and approach to inclusive services within a given brand.

• Smaller scale developments, with only a few accessible rooms, could simply produce a statement based on the recommendations of PAS 88:2008, Visit England's National Accessible Scheme (see http://www.enjoyengland.com/ Practical-Information/Accessible- England/National-Accessible-Scheme. htm) or other best practice available at the time of the development.

• All AMPs should be reviewed annually. A new AMP and DAS will be required with any major refurbishment or material change of the interior that triggers a new planning application.

10   The preparation stages of the AMPs coincide with those of the Travel Plan and should include the following steps:

• At planning stage, it will be appropriate to agree the main terms of the AMP with the borough planning officers. Pre- application reviews and discussion are encouraged for large applications.

- At Planning Submission stage, a final AMP will accompany the Design and Access Statement and be considered as part of the planning application.

- Post-permission and pre-opening, it may be necessary to update the AMP and include additional detail, in accordance with any conditions and / or planning legal obligations.

- Post-opening, the implementation of the Accessibility Management Plan will be rolled out. Monitoring, ongoing review and improvement is encouraged.

- Assistance from suitable organisations supporting travel for disabled people may be sought at any stage.

11 Accessibility Management Plans should identify as a minimum, the approach and policy for the following:

- Nominating an individual as Accessibility Coordinator (preferably a member of staff based on the premises) with an outline of his/ her duties

- Training of staff in disability equality issues

- Ensuring an inclusive approach to enquiries and booking procedures, including strategies for ensuring booking web sites include access information

- Reserving rooms for disabled people (such as last-let basis)

- Allocating adjacent /interconnecting rooms for personal assistants (including policy on room charges)

- Providing welcome packs (which include the Access Statement as recommended in PAS 88:2008) including detailed information of the room, its facilities and mobile equipment, the contact details for the Accessibility Coordinator or a trained advisor based within the hotel and familiarisation tours on arrival.

- Allocating parking on the premises or alternative arrangements to facilitate older people and those with a Blue Badge

- Design and maintenance of furniture and fittings that are part of the accessibility provision of a room

- Providing, maintaining and reserving equipment, such as mobile hoists, hearing loops, shower and bath seats, etc.

- Arrangements for making standard equipment accessible for example by indicating unimpeded access to curtains, and storage of spare linens within reach of a wheelchair user

- Means of escape procedures

- Encouraging feedback from disabled guests

- Reviewing the AMP.

Appendix 11: Glossary

Access This term refers to the methods by which people with a range of needs (such as disabled people, people with children, people whose first language is not English) find out about and use services and information. For disabled people, access in London means the freedom to participate in the economy, in how London is planned, in the social and cultural life of the community.

Accessibility This term is used in two distinct ways, its definition depending on the accompanying text (see Accessibility of London and Accessibility of the Transport System below).

Accessibility of London This refers to the extent to which employment, goods and services are made available to people, either through close proximity, or through providing the required physical links to enable people to be transported to locations where they are available.

Accessibility of the Transport System This refers to the extent of barriers to movement for users who may experience problems getting from one place to another, including disabled people.

Access action plans These can ensure that an access strategy is effective and appropriate. They could include conducting an access audit of premises to identify barriers to the participation of disabled people in life in the area, deciding on what adjustments are needed, involving disabled people when proposing solutions and identifying priorities, implementing improvements to an agreed timescale, monitoring and reviewing improvements.

Access Statement This is a statement which accompanies a planning application and demonstrates how the principles of inclusive design, including the specific requirements of disabled people, have been integrated into the proposed development and how inclusion will be maintained and managed.

Access Strategy Access strategies have replaced access statements for applications for Building Control approvals. Access strategies should clearly communicate how the chosen approach to meeting the accessibility requirements of the likely end-users of a building and its facilities demonstrates compliance with the functional requirements, M1 – M4 of Part M of the Building Regulations.

Changing Places toilets A CP toilet provides sanitary accommodation for people with multiple and complex disabilities who have one or two assistants.

Disability The loss or limitation of opportunities that prevent people who have impairments from taking part in the normal life of the community on an equal level with others, due to physical and social barriers.

Disabled person A disabled person is someone who has an impairment, experiences externally imposed barriers and self-identifies as a disabled person.

Diversity The differences in the values, attitudes, cultural perspective, beliefs, ethnic background, sexuality, skills, knowledge and life experiences of each individual in any group of people constitute the diversity of that group. This term also refers to differences between people and is used to highlight individual need.

Equality The vision or aim of creating a society free from discrimination where equality of opportunity is available to individuals and groups, enabling them to live their lives free from discrimination and oppression.

Equal opportunities The development of practices that promote the possibility of fair and equal chances for all to develop their full potential.

Inclusive design Design that creates an environment where everyone can access and benefit from the full range of opportunities available to members of society. It aims to remove barriers that create undue effort, separation or special treatment, and enables everyone regardless of disability, age, or gender to participate equally, confidently and independently in mainstream activities with choice and dignity.

Lifetime Homes Ordinary homes designed to provide accessible and convenient homes for a large segment of the population from young children to frail older people and those with temporary or permanent physical or sensory impairments. Lifetime Homes design features that ensure that the home will be flexible enough to meet the existing and changing needs of most households.

The London Plan The overall strategic plan for London, and it sets out a fully integrated economic, environmental, transport and social framework for the development of the capital to 2031. It forms part of the development plan for Greater London. London boroughs' local plans need to be in general conformity with the London Plan, and its policies guide decisions on planning applications by councils and the Mayor.

Public realm The space between and within buildings that are publicly accessible, including streets, squares, forecourts, parks and open spaces.

Section 106 Agreements Planning obligations under Section 106 of the Town and Country Planning Act 1990 (as amended), commonly known as s106 agreements, are a mechanism which make a development proposal acceptable in planning terms, that would not otherwise be acceptable. They are focused on site specific mitigation of the impact of development.

Shopmobility scheme A service which helps people with mobility difficulties get around a town centre through free loan of wheelchairs and electric scooters and by providing volunteer escorts to help people go shopping.

Social inclusion The position from where someone can access and benefit from the full range of opportunities available to members of society. It aims to remove barriers for people or for areas that experience a combination of linked problems such as unemployment, poor skills, low incomes, poor housing, high crime environments, poor health and family breakdown.

Social model of disability The government's Office of Disability Issues explains that the social model of disability considers that disability is created by barriers in society, not by an individual's medical condition. These barriers generally fall into three categories:

- the environment — including inaccessible buildings and services;

- people's attitudes — stereotyping, discrimination and prejudice;

- organisations — inflexible policies, practices and procedures.

Supplementary Planning Guidance (SPG) Guidance which supplies supplementary information in respect of the policies in a current

or emerging local plan. It is a means of setting out more detailed thematic or site specific guidance on how these policies will be applied in particular circumstances or areas.

Sustainable development Development that meets the needs of the present without compromising the ability of future generations to meet their own needs.

Transport for London (TfL) One of the GLA group organisations, accountable to the Mayor, with responsibility for delivering an integrated and sustainable transport strategy for London.

Wheelchair housing Homes built to meet the standards set out in the Wheelchair Housing Design Guide, second edition, Habinteg Housing Association, 2006

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Chinese

如果需要您母語版本的此文件，
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Vietnamese

Nếu bạn muốn có văn bản tài liệu này bằng ngôn ngữ của mình, hãy liên hệ theo số điện thoại hoặc địa chỉ dưới đây.

Greek

Αν θέλετε να αποκτήσετε αντίγραφο του παρόντος εγγράφου στη δική σας γλώσσα, παρακαλείστε να επικοινωνήσετε τηλεφωνικά στον αριθμό αυτό ή ταχυδρομικά στην παρακάτω διεύθυνση.

Turkish

Bu belgenin kendi dilinizde hazırlanmış bir nüshasını edinmek için, lütfen aşağıdaki telefon numarasını arayınız veya adrese başvurunuz.

Punjabi

ਜੇ ਤੁਹਾਨੂੰ ਇਸ ਦਸਤਾਵੇਜ਼ ਦੀ ਕਾਪੀ ਤੁਹਾਡੀ ਆਪਣੀ ਭਾਸ਼ਾ ਵਿਚ ਚਾਹੀਦੀ ਹੈ, ਤਾਂ ਹੇਠ ਲਿਖੇ ਨੰਬਰ 'ਤੇ ਫ਼ੋਨ ਕਰੋ ਜਾਂ ਹੇਠ ਲਿਖੇ ਪਤੇ 'ਤੇ ਰਾਬਤਾ ਕਰੋ:

Hindi

यदि आप इस दस्तावेज की प्रति अपनी भाषा में चाहते हैं, तो कृपया निम्नलिखित नंबर पर फोन करें अथवा नीचे दिये गये पते पर संपर्क करें

Bengali

আপনি যদি আপনার ভাষায় এই দলিলের প্রতিলিপি (কপি) চান, তা হলে নীচের ফোন নম্বরে বা ঠিকানায় অনুগ্রহ করে যোগাযোগ করুন।

Urdu

اگر آپ اِس دستاویز کی نقل اپنی زبان میں چاہتے ہیں، تو براہ کرم نیچے دئے گئے نمبر پر فون کریں یا دیئے گئے پتے پر رابطہ کریں

Arabic

إذا أردت نسخة من هذه الوثيقة بلغتك، يرجى الاتصال برقم الهاتف أو مراسلة العنوان أدناه

Gujarati

જો તમને આ દસ્તાવેજની નકલ તમારી ભાષામાં જોઈતી હોય તો, કૃપા કરી આપેલ નંબર ઉપર ફોન કરો અથવા નીચેના સરનામે સંપર્ક સાધો.