

## Accessible London: achieving an inclusive environment The London Plan Supplementary Planning Guidance



April 2004

**Accessible London: achieving an inclusive environment**  
The London Plan Supplementary Planning Guidance

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## Mayor's foreword

My vision is to create an environment in London in which all people have equal, easy and dignified access to London's buildings, places and spaces. I want all new developments in London to meet the highest standards of access and inclusion. I want to combat discrimination and promote equality of opportunity throughout London. I am committed to London becoming accessible and inclusive, as befits a World City.

I am particularly concerned about people who are excluded from our built environment through inaccessible design, poor management and inadequate information. Disabled people in particular continue to be excluded, disadvantaged and discriminated against and are frequently denied the opportunity to participate fully as equal citizens in our society. 'Another Planet? Disabled and Deaf Londoners and Discrimination', the first independent survey of disabled Londoners, asked disabled people about their actual everyday experience of living in the capital. It presents a compelling picture of the continuing inequality that disabled Londoners face and confirms that one of the major barriers to equal participation in London is the design and management of the built environment. Older people, children and carers of young children also find the design of the built environment can create unnecessary barriers, which result in frustration and hardship and sometimes complete exclusion. The needs of all Londoners, regardless of disability, age or gender, must be specifically included in all aspects of mainstream life in London if we are to make significant improvements in social inclusion.

Planning is fundamental to the way London looks and works, and can make a major contribution to the lives of all of us. However, we have a long way to go before London's built environment is designed, built and managed in a way that gives all of us the same opportunities. I want to ensure that the planning system in London helps to incorporate all our access needs into development proposals and contributes fully to ending discrimination and delivering an accessible and inclusive environment for everyone.

My Spatial Development Strategy, the London Plan, is based on social inclusion and giving all Londoners the opportunity to share in London's future success. One of the key objectives of the London Plan is to build a London that is more accessible to disabled people. It sets out a framework and policies for achieving the highest standards of safe, easy and inclusive access for all people, regardless of disability, age or gender. This Supplementary Planning Guidance, Accessible London, provides detailed guidance on these London Plan policies.



Ken Livingstone, Mayor of London



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## summary

### **The purpose of this Supplementary Planning Guidance**

Policies have been included throughout the London Plan (published February 2004) to promote social inclusion and to help eliminate discrimination. This Supplementary Planning Guidance (SPG) provides detailed advice and guidance on the policies which promote an inclusive environment in London. SPG does not form part of the statutory plan; only the policies in the London Plan have the status that the GLA Act 1999 provides in considering planning applications, however, SPG can be taken into account as a further material consideration so has weight as a formal supplement to the London Plan. Twenty-eight Implementation Points (listed in Appendix 1) should assist boroughs when reviewing their Unitary Development Plans (UDPs) and development control practices and procedures and when assessing planning applications. The SPG provides details of where to get further information and should assist boroughs, developers, architects, urban designers, facilities managers and others with responsibility for making improvements to London's built environment. Case study examples are illustrated in a separate document.

This Supplementary Planning Guidance:

- provides guidance on the policies contained in the London Plan regarding the promotion of an inclusive and accessible environment
- gives local planning authorities advice on how to implement those 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
- gives disabled people an understanding of what to expect from planning in London
- identifies legislation and national planning policy guidance relevant to the promotion of an inclusive and accessible environment.

The draft Supplementary Planning Guidance was subject to a statutory three-month period of public consultation from July to October 2003 and has now been revised to take account of comments received. It has been prepared within the context of the advice and guidance current at the time of going to print but will be subject to an ongoing process of monitoring and review as the strategic policy framework, legislation and government guidance change.



# 1 introduction

## 1.1 The social model of disability and the principles of inclusive design

### **London Plan Policy 4B.5: Creating an inclusive environment**

The Mayor will require all future development to meet the highest standards of accessibility and inclusion.

UDP policies should integrate and adopt the following principles of inclusive design that will require that developments:

- can be used safely and easily by as many people as possible without undue effort, separation or special treatment
- offer the freedom to choose and the ability to participate equally in the development's mainstream activities
- value diversity and difference.

Boroughs should require development proposals to include an Access Statement, showing how the principles of inclusive design, including the specific needs of disabled people, have been integrated into the proposed development, and how inclusion will be maintained and managed. These principles and the requirements of Policy 3A.14 (Addressing the needs of London's diverse population) should be adopted by all responsible for changing or managing the built environment.

### **SPG Implementation Point 1: The principles of inclusive design**

*The Mayor has adopted "the social model of disability" (see paragraph 1.1.2) and the principles of inclusive design underpin his approach to planning. To achieve an accessible and inclusive environment consistently across London the Mayor recommends that the boroughs adopt this approach.*

- 1.1.1 Disabled people historically have been excluded from mainstream society, and continue to face discrimination and prejudice leading to disadvantage and oppression. Disabled people are often made unnecessarily dependent on others, as their needs are either ignored, or access is provided in a segregated and separate way. Disabled people are not, however, a homogenous group with identical needs. People of all ages and from all of London's culturally and ethnically diverse communities will have a variety of different impairments and different needs but will become similarly disabled as a result of the barriers imposed on them by society.
- 1.1.2 Society has tended to respond to disabled peoples' needs by providing separate or special services based on an individual's impairment. The Mayor rejects this 'medical' model of disability and accepts instead the social model of disability, which makes the important distinction between



‘impairment’ and ‘disability’. Many people have physical or sensory impairments or learning difficulties, or are living with mental health needs and have set up mechanisms to manage their impairment on a day-to-day basis. However, it is not the impairment that results in an individual being excluded, but the way in which society responds to the individual with the impairment. Society is organised in a way that takes little or no account of people who have impairments. Barriers such as poor design, inadequate information or discriminatory attitudes can exclude people who have impairments. If disabled people are to participate in mainstream society, which is their human right, the way society is organised must be changed. Removing these externally imposed barriers will bring about this change.

- 1.1.3 Attitude and management practices and procedures are crucial in achieving social inclusion, so raising awareness about institutional discrimination and training staff in equality issues is key. Black disabled people and disabled people from minority ethnic communities and from faith groups can experience many forms of discrimination. The Disability Discrimination Act 1995 (DDA) has given disabled people the right to challenge discriminatory behaviour, such as a policy which bans all dogs resulting in a young person being told to leave a shop because of her guide dog (this is now illegal). This SPG is about the barriers created by the way we design, construct, manage and maintain the built environment.
- 1.1.4 Inclusive design is based on the social model of disability, as it focuses on the design of the environment not on an individual’s impairment. Creating an inclusive environment is one of the cross-cutting policies in the London Plan, contributing to all six plan objectives, particularly the objectives to make London a more attractive and well-designed city, and promoting social inclusion and tackling deprivation and discrimination. Inclusive design is seen as being fundamental to the aim of achieving social inclusion. Promoting the principles of inclusive design is part of an initiative to encourage world-class design in London. The Mayor has made world class design a key priority through London Plan Policy 4B.2: ‘Promoting world class architecture and design’, and is preparing design guidelines for London. (See paragraph 3.12 on the public realm.)
- 1.1.5 The Office of the Deputy Prime Minister (ODPM) in 2003 produced a good practice guide called ‘Planning and Access for Disabled People’<sup>1</sup> which defines an inclusive environment as one that can be used by everyone, regardless of age, gender or disability. It is made up of many elements such as society’s and individual’s attitudes, the design of products and communications, and the design of the built environment itself. It recognises and accommodates differences in the way people use the built environment and provides solutions that enable all of us to

participate in mainstream activities equally, independently, with choice and with dignity.

- 1.1.6 Buildings designed to be inclusive will be safe, predictable, convenient, flexible, adaptable, sustainable and legible and will be useable by all of us. These principles of inclusive design have emerged from an approach to designing buildings that are accessible to disabled people. Many disabled people have become frustrated, as their access needs are often considered as an afterthought in order to gain Building Control approval for a scheme. Making special provision for disabled people, rather than integrating their needs with all other users, often results in unsatisfactory solutions. Disabled people are not a homogenous group with identical needs, and meeting the needs of some people can create conflict for others. However, when everyone's needs are considered at the beginning of the design process and the principles of inclusive design are applied, many potential conflicts can be avoided and the building will become accessible to disabled people, and to people who would otherwise be excluded.
- 1.1.7 An inclusive environment does not attempt to meet every single need, but by considering people's diversity, an inclusive environment can break down unnecessary barriers and exclusion, and will often achieve superior solutions. Inclusive design benefits individuals with physical, sensory or learning impairments, older people, mental health system users/survivors, children, carers of young children, people with temporary impairments or simply encumbered with heavy luggage or shopping. Inclusive design benefits all of us.

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*Further information on inclusive design*

Inclusive design is further explained in the ODPM Good Practice Guide 'Planning and Access for Disabled People'<sup>1</sup> (March 2003) ([www.odpm.gov.uk](http://www.odpm.gov.uk)) and in the Disability Rights Commission discussion paper 'What is an inclusive environment and how can it be achieved?'<sup>2</sup> (2002) ([www.drc-gb.org.uk](http://www.drc-gb.org.uk)).

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## 2 Delivering an inclusive environment

This section outlines national policy guidance and the latest government advice on how an inclusive environment can be delivered; highlights the key development control issues of requiring Access Statements, using access expertise and consulting with local access groups; and looks at current technical standards.

### 2.1 National policy context

- 2.1.1 Since the International Year of Disabled People in 1981, the government has recognised the role of planning in promoting access and facilities for disabled people. Appendix 2 gives further details of the relevant sections of the Town and Country Planning Act 1990, Planning Policy Statements and Guidance, the Building Regulations 2000 and the Disability Discrimination Act 1995. From October 2004 the final provisions of the DDA come into force which may affect physical access to buildings where a service is being provided to the public. Many local authorities have undertaken access audits of their services to ensure they are not discriminating against disabled people.
- 2.1.2 The latest government planning advice is contained in the ODPM's consultation paper Planning Policy Statement 1: Creating Sustainable Communities<sup>3</sup> (which will replace PPG 1). One of the key messages in the Government's vision for planning is the need for planning authorities to take an approach based on integrating the aims of sustainable development, one of which is social inclusion - social progress which recognises the needs of everyone. Paragraph 1.19 states that 'Planning policies should promote development that builds socially inclusive communities; should address accessibility for all to jobs, health, housing, education, shops, leisure and community facilities; should take into account the needs of women, young people and children and the elderly, as well as disabled people, black and minority ethnic groups and other disadvantaged groups'. Another key message in PPS1 is the need for the planning system to be transparent, accessible and accountable, and to promote participation and involvement.
- 2.1.3 The ODPM's good practice guide 'Planning and Access for Disabled People'<sup>1</sup> gives comprehensive advice on the role of the planning system in promoting an accessible and inclusive environment and recommends 19 Good Practice Points which the Mayor supports. The advice in this SPG is based on that government advice. The advice has been interpreted as it applies to London, and a number of SPG Implementation Points have been identified for adoption by the Mayor and the London boroughs.
- 2.1.4 The Planning and Compulsory Purchase Bill, likely to be enacted in 2004, has given the government the opportunity to review Section 76 of the

Town and Country Planning Act 1990. It is likely that the government will address the access issue throughout the planning process, mainstreaming disability equality into the planning process and culture. The preparation of Statements of Community Involvement will set out how local authorities will consult with disabled people when preparing their local development documents. In the meantime, the Mayor will expect to see evidence that local disabled people have been consulted during the preparation of UDPs. The Bill also requires local authorities to contribute to the achievement of sustainable development, which means taking full account of the social, economic and environmental impacts of proposed development, and by definition therefore whether or not the development provides inclusive access for the whole community.

## 2.2 The Disabled Persons Transport Advisory Committee (DPTAC) Principles

- 2.2.1 In 2000, the role of the Disabled Person's Transport Advisory Committee (DPTAC) was extended to advise the government on improving access to the built environment for disabled people. DPTAC is committed to bringing about an inclusive environment; ensuring transport, buildings and the spaces between them are easy to reach, use and understand in safety and comfort. DPTAC's overriding aim is to work for a fully inclusive transport system and built environment within the next ten years. DPTAC defines a fully inclusive built environment as one which:
- provides equitable access
  - allocates appropriate space for people
  - ensures ease of use, comprehension and understanding
  - requires minimal stress, physical strength and effort
  - achieves safe, comfortable and healthy environments.
- 2.2.2 DPTAC has identified four overarching principles on which to base its advice to the government. The Mayor supports these principles.

### **SPG Implementation Point 2: DPTAC principles**

*The Mayor will and boroughs should seek to support the work of the DPTAC Built Environment Group by adopting the following principles and incorporating them into the planning process in London.*

- *Accessibility for disabled people is a condition of any investment.*
- *Accessibility for disabled people must be a mainstream activity.*
- *Disabled people should be involved in determining accessibility.*
- *Accessibility for disabled people is the responsibility of the provider.*

## 2.3 Key development control issues

The next sections look at how the development control process can influence the provision of inclusive design in new developments.

## 2.4 Early consideration

### **SPG Implementation Point 3: Integrating access needs 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.*

### **SPG Implementation Point 4: Pre-application discussions**

*Boroughs should encourage pre-application discussions with applicants, and consider amending planning application forms to make applicants think proactively about inclusive design early in the design process.*

- 2.4.1 It is a priority of the Mayor that all new developments in London integrate the needs of disabled people from the outset of the planning process. Experience has shown that if needs are not fully incorporated from the very beginning of the planning process, disabled people may be able to gain access, but often not in an inclusive way. For example a ramp may be built at an entrance, but it may be too long or steep for a disabled person to use alone. A platform lift may be installed, but it may not be usable without staff assistance and/or it may be unreliable.
- 2.4.2 Access 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. Guidance on writing project briefs was issued by DPTAC in 2003; 'Inclusive Projects: a guide to best practice on preparing and delivering project briefs to secure access'<sup>4</sup> stresses the need to commit to and integrate inclusive design principles at all stages of the project briefing process.
- 2.4.3 Boroughs should consider putting a question on the planning application form to ascertain whether the applicant has properly considered and provided for inclusive access.

## 2.5 Access Statements

### **Extract from London Plan Policy 4B.5: Creating an inclusive environment:**

Boroughs should require development proposals to include an Access Statement, showing how the principles of inclusive design, including the specific needs of disabled people, have been integrated into the proposed development, and how inclusion will be maintained and managed.

### **SPG Implementation Point 5: Access Statements**

*Access Statements submitted with a planning application should identify the applicant's approach to inclusive design, the key issues of the scheme, and the sources of advice and guidance used.*

- 2.5.1 Draft PPS 1 states in Annex C that local planning authorities should ensure that they have sufficient information on which to make an informed decision on the design, timing and accessibility of each scheme. Policy 4B.5 of the London Plan requires planning applications to submit an Access Statement which sets out the approach taken to deliver an accessible and inclusive environment. This will ensure that access is considered at the earliest possible stage in the development process and that the facilities are designed to meet the highest standards of accessibility and inclusion. The ODPM Good Practice Guide<sup>1</sup> recommends that boroughs might reject the registration of an application until a satisfactory Access Statement has been received.
- 2.5.2 Preparing an Access Statement is not an onerous task, as the issues should already have been considered as part of the original project brief (see Inclusive Projects<sup>4</sup>). The statement should be viewed as part of the process; as a tool to demonstrate that all relevant issues have been considered throughout the design and construction stages. The Access Statement should not be seen as a static document but as a process which evolves with the scheme, starting as an Access Strategy at project brief stage, and gradually becoming more detailed throughout the project, taking on board any changes as the scheme progresses, until it is finally added to the building's log book for use by facilities management once the building is in use. As this information may subsequently help in Disability Discrimination Act (1995) cases, the Disability Rights Commission is producing a detailed note about Access Statements, which will be available on their website.
- 2.5.3 The Access Statement should be treated as more than just a commitment to meet the minimum standards of the 2004 edition of Part M of the Building Regulations<sup>5</sup>. It should clearly demonstrate the applicant's

approach to inclusion, and show how all potential users, regardless of disability, age or gender, can enter the site, move around the site, enter the buildings and use the facilities. It is recommended that a marked-up plan at an appropriate scale, including sections showing relevant gradients and any changes in level, is submitted with the written Access Statement. This plan should illustrate:

- the main step-free pedestrian routes internally and externally, showing how people move up and down as well as around the building(s) and the spaces between the buildings;
- access to car parking and public transport facilities
- staff and visitor entrances
- other relevant facilities and features, including toilet facilities.

- 2.5.4 The Access Statement should give details of national standards used, such as British Standard BS 8300 2001<sup>6</sup>, Inclusive Mobility<sup>7</sup>, Lifetime Home Standards<sup>8</sup> and Wheelchair Housing Standards<sup>9</sup> and any relevant local standards. The Access Statement should also give details of any consultation process conducted with local groups, particularly the local access group and the borough's access officer. Solutions to providing inclusive access may vary depending on the size, scale, nature and intended use of the building, particularly when applied to existing buildings. Where the principles of inclusive design and best practice standards cannot be adhered to, the Access Statement enables the developer to explain the constraints of the scheme and the solutions introduced to overcome the issue and provide a satisfactory outcome. Design details of internal features such as toilet layouts, heights of sockets and light switches, or facilities in meeting rooms or lifts would not necessarily be expected at planning application stage, but may well form part of the Access Statement submitted with a building application.
- 2.5.5 All applications referred to the Mayor are likely to require an Access Statement due to the strategic nature of the proposal. For major areas of regeneration an Access Strategy should form part of the masterplan for the area, with more detailed access statements developed for each building or element of the scheme. Boroughs may, however, decide that Access Statements are not required on certain types of application such as small householder applications and some minor works where inclusive access is not an issue. It would be helpful if these exceptions were listed and justified in UDPs.
- 2.5.6 It is likely that Access Statements will be given additional statutory weight as the government announced in March 2004 an amendment to the Planning and Compulsory Purchase Bill which would require that an



application for planning permission must be accompanied by a statement about how issues relating to access to the development have been dealt with. The type of development that this will apply to is likely to be the subject of government consultation.

## 2.6 The use of access expertise

### **SPG Implementation Point 6: Access expertise**

*The Mayor will and boroughs should recommend applicants to appoint an appropriate access consultant for all major projects.*

*The Mayor has and boroughs should endeavour to appoint an access officer, but as a minimum, each authority should be able to call on appropriate professional advice whenever necessary - either through information and resource sharing with other local authorities, or by the appointment of appropriate access consultants. This will ensure that the principles of inclusive design are fully understood and incorporated into development proposals.*

- 2.6.1 Despite the growing awareness about the access needs of disabled people, there is still a high level of ignorance about detailed design issues. Attention to detail is very important for disabled people, and can make the difference between a building being very easy or very difficult to use. For example, floor surfaces can be too slippery for stick users or too resistant for wheelchair users. Door closers are often set so that doors are very heavy to open. Handrails on stairs frequently stop on the penultimate stair, a particular hazard for visually impaired people and people with balance difficulties who use handrails for essential support. Patterns in floor and wall surfaces, lack of colour and tone contrast and poor lighting can cause confusion and disorientation. Choice of materials can affect acoustic quality and make hearing difficult. Detailed design issues which affect the accessibility and usability of a building or space will not always be relevant on all planning applications, however, such details may be relevant to planning or listed building consents so planning staff should receive continuing professional development training in access and inclusive design issues and disability equality. Close liaison with building control colleagues can help raise awareness of detailed design issues.
- 2.6.2 Many, but not all London boroughs employ an access officer as the main focal point for information, training and advice on the access needs of disabled people. They should be consulted on all relevant planning applications and can help with the negotiations on major applications, as they can ensure that the essential detailed inclusive design issues are not ignored. Access officers can also provide an essential continuous link to

ensure that access issues raised at pre-planning application meetings are followed through as the scheme evolves to planning permission, building control approval, detailed design, building occupation and management and can help to monitor and review policies and help manage their implementation. The London Region of the Access Association actively supports London's access officers, by providing continuing professional development sessions at their monthly meetings held at Guildhall in the City of London.

- 2.6.3 It is advisable that for all major projects applicants use the skills of an access consultant to advise on development briefs, the access strategy and detailed access statements. DPTAC's Inclusive Projects<sup>4</sup> guide recommends that developers appoint an Access Champion as one of the key project team advisors. The Government supported setting up a National Register of Access Consultants to ensure that appropriately skilled and experienced access consultants were formally recognised and accredited.

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*Further information on access officers and access consultants*

The Royal Association of Disability and Rehabilitation (RADAR) undertook a survey in 2000 of the 32 London boroughs and the City of London, and found that 23 boroughs were employing access officers and one borough was using an external consultant. Further details can be obtained from RADAR at [www.radar.org.uk](http://www.radar.org.uk) and from the Access Association [www.accessassociation.co.uk](http://www.accessassociation.co.uk). A list of access officers in London can be found in Appendix 3.

Appropriate access consultants can be identified through the National Register of Access Consultants [www.nrac.org.uk](http://www.nrac.org.uk).

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## **2.7 Effective consultation with local access groups**

### **SPG Implementation Point 7: Local access groups**

*Boroughs should endeavour to set out in their Statements of Community Involvement how disabled people will be involved in the planning system.*

*The Mayor holds monthly meetings with the London Access Forum and boroughs should endeavour to support and service regular meetings with their local access group, to ensure that the benefits of direct community involvement and the expertise of people with personal experience of impairment are used to the best effect.*

- 2.7.1 As well as having access to good technical expertise, it is also essential to involve disabled people in the planning process, as they are the experts on their own access needs and many have now developed considerable expertise in planning and access issues. More effective community involvement is a key element of the government's planning reforms. Draft PPS 1<sup>3</sup> recognises that planning affects everyone and all those involved in the system have a role to play in delivering effective and inclusive planning. Under the Planning and Compulsory Purchase Bill, local planning authorities will be required to prepare a Statement of Community Involvement, in which they will set out their policy on involving their community in preparing Local Development Documents and on consulting on planning applications. Draft PPS 1<sup>3</sup> expects planning authorities to reach out to groups that have historically not engaged easily with the planning system (paragraph 1.33).
- 2.7.2 Disabled people are very keen to participate in the planning system and there are now 28 active access groups in London. The local access group should be consulted sufficiently early in the process to influence the design of the scheme and have their views taken fully into account. Presentations to the local access group by the architects of a proposed scheme can be a very effective way of resolving access issues at an early stage. Draft PPS 1<sup>3</sup> states in paragraph 1.39 that community involvement should be planned in from the start of the process.
- 2.7.3 Some access groups benefit from having excellent support from their local authority (including funding and other resources), and as a result have developed sophisticated ways of promoting inclusive design principles (see Islington Access Group case study). Sometimes however, groups have experienced difficulties and frustration when trying to communicate their views to their local planning authority, receive no feedback on their comments and have become disillusioned with the planning process as a result. It is essential to involve experts in access directly in the planning process, and people with personal experience of impairment can contribute in a very practical and effective way. Strategies for engaging with the local access group should be developed in partnership with the group to ensure that their time and expertise is used effectively.

**Case study: Islington Access Course**

Islington Access Group, in partnership with the University of Lincoln and Humberside and with the support of Islington Council's access officers, has organised a new and exciting Short Course in Access Auditing. The course is aimed primarily at disabled people who wish to join the National Register of Access Consultants or who have a particular interest in the subject.

- 2.7.4 This SPG was written in conjunction with disabled people and representatives of organisations of disabled people, who participated in the steering group set up to guide the content and drafting of this SPG (see acknowledgements). Members of the London Access Forum continue to advise the Mayor's planning decisions.

#### Case study: Fountain in Basinghall Street, City of London



Following discussions with the City of London Access Group, this water feature in Basinghall Street was designed to give partially sighted people a visual and tactile warning of the potential hazard. The result is a feature that everyone can enjoy.

#### *Further information on access groups*

The London Access Forum is a network of access groups working in London, to promote better access for disabled people to the built environment. Representatives from each access group meet every quarter at RADAR. A planning sub-group has recently been set up, which meets monthly at City Hall to advise the GLA Planning Decisions Unit on access provided in strategic planning applications. More details can be obtained from RADAR at [www.radar.org.uk](http://www.radar.org.uk). A list of local access groups in London can be found in Appendix 3.

There are networks of organisations controlled by disabled people in the majority of London boroughs, many of whom campaign for better access. Greater London Action on Disability (GLAD) is an umbrella organisation for these organisations, and has contact details. GLAD can be contacted at [www.glad.org.uk](http://www.glad.org.uk).

## 2.8 Planning conditions and Section 106 Agreements

### **SPG Implementation Point 8: Planning conditions and Section 106 Agreements**

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

- 2.8.1 Any comments and recommendations for improvement made by the local access group and/or the access officer should, where appropriate, be shown on revised drawings 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 eight-week time limit for dealing with an application. It may therefore 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.
- 2.8.2 Section 106 Agreements and developers' contributions can also be used to provide added value to a scheme, by improving access and facilities for disabled people in the locality of the proposal. For example, in PPG 6 Town Centres and Retail Development (June 1996) the government states that 'where appropriate, planning obligations can be used to secure developer contributions to new or improved public transport or improved pedestrian access where this is directly related to the development'.

## 2.9 Technical guidance

### **SPG Implementation Point 9: Achieving the highest standards of inclusion**

*The Mayor will and boroughs should encourage applicants to exceed the minimum standards of reasonable provision for disabled people and aim to achieve the highest standards of safe, easy and inclusive access for all people, regardless of disability, age or gender.*

- 2.9.1 This SPG does not give advice on detailed technical standards. There are many technical documents available which give designers advice on how to ensure a building is easily used by as many people as possible (see Appendix 9 References). The most recent advice on access for disabled people, British Standard 8300 'The design of buildings and their approaches to meet the needs of disabled people'<sup>6</sup>, was published in

October 2001. This code of practice gives comprehensive technical advice on a number of building elements, including the design of car parking, access routes, entrances, horizontal and vertical circulation, surfaces and communication aids, and facilities for residential and non-residential buildings. It replaces the previous standards BS 5810:1979 'Access for the disabled (sic) to buildings' and BS 5619:1978 'Design of housing for the convenience of disabled people'. The advice in the British Standard is not repeated here, but attention is drawn to the fact that it is significantly more comprehensive than the previous standards.

2.9.2 The revisions made to the non-domestic provisions of Part M of the Building Regulations 2000<sup>5</sup> also signify a major step forward in setting minimum standards for new buildings, by bringing the Approved Document in line with the British Standard BS 8300 2001. More significantly the 2004 edition of Part M 'Access to and Use of Buildings'<sup>5</sup> applies to existing non-domestic buildings that are being altered or undergoing a change of use, so will have a substantial impact on the accessibility of existing non-domestic buildings. Although these revisions have been welcomed by many disabled people, Part M cannot deliver a fully inclusive environment, for example, the current standards relating to new housing do not facilitate full independent living for all disabled people (see paragraph 3.2.3). However, the Government announced in March 2004 a review of Part M to consider whether Lifetime Home standards or an updated version should be included in the Building Regulations, and further research to look at practical ways to deliver enough wheelchair accessible homes. Boroughs should actively encourage planning applicants to exceed minimum standards in order to achieve a truly inclusive environment. Boroughs such as Waltham Forest, Greenwich, Ealing, Islington and the City of London have developed good practice standards for use in their areas.

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### *Further information on technical standards*

The minimum standards of reasonable provision are set out in

- ‘Access to and Use of Buildings’ the 2004 edition of Part M of the Building Regulations 2000<sup>5</sup>.
- BS 8300 2001 Code of practice on the design of buildings and their approaches to meet the needs of disabled people’ October 2001<sup>6</sup>.
- Inclusive Mobility<sup>7</sup> provides advice on access in the external environment.
- Standards for the design of housing are outlined in section 3.2.

DPTAC’s Access Directory contains over 400 sources of information on access issues and reviews the scope and relevance of each one providing a one-stop-shop of access advice and information, see [www.dptac.gov.uk](http://www.dptac.gov.uk).

To address the specific access needs of visually impaired people the Royal National Institute for Blind People (RNIB) [www.rnib.org.uk](http://www.rnib.org.uk) issued guidance in 1995 called “Building Sight: A Handbook of Building and Interior Design Solutions<sup>10</sup> - to include the needs of visually impaired people”. It gives advice on many aspects of the built environment including colour and contrast, tactile paving and wayfinding.

The JMU Access Partnership, (a not-for-profit pan disability access consultancy supported by the RNIB [www.jmuaccess.org.uk](http://www.jmuaccess.org.uk)), produced the “Sign Design Guide<sup>11</sup>” in 2001 jointly with the Sign Design Society, which gives comprehensive guidance on signs and promotes one sign for all, enabling everyone’s signage needs to be met.

The Council on Deafness [www.deafcouncil.org.uk](http://www.deafcouncil.org.uk) produced a good practice guide<sup>12</sup> in 2001 on providing access to public services for deaf people. The Royal National Institute for Deaf People [www.rnid.org.uk](http://www.rnid.org.uk) and the British Deaf Association [www.britishdeafassociation.org.uk](http://www.britishdeafassociation.org.uk) can also provide advice on the specific needs of deaf people.

The Centre for Accessible Environments [www.cae.org.uk](http://www.cae.org.uk) have updated their guidance ‘Designing for Accessibility’<sup>13</sup>, and provide training and consultancy on how the built environment can best be made or modified to achieve inclusion by design.

Greater London Action on Disability (GLAD) [www.glad.org.uk](http://www.glad.org.uk) produced in September 2003 ‘Designing for equality in an inclusive London’<sup>14</sup> with the aim of promoting consistent London wide standards of access.

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## 3 Implementing inclusive access

### **SPG Implementation Point 10: Inclusive access policies**

*UPDs should include appropriate inclusive access policies at all levels and not rely on a single access policy.*

*If a development proposal does not meet the highest standards of accessibility and inclusion for all people, regardless of disability, age or gender, bearing in mind other policy considerations, boroughs should consider refusing planning permission on the grounds that the scheme does not comply with the Unitary Development Plan.*

This section looks at the issues and policies raised in the London Plan, particularly Policy 4B.5 'Creating an Inclusive Environment'. It sets out how the principles of inclusive design can be applied to development proposals for employment, housing, health, education, retail, culture, leisure and sport, play, tourism, the public realm, open spaces, historic environment and transport. This should assist boroughs when reviewing their Unitary Development Plans. The Mayor will also consider strategic planning applications using this policy context.

### **3.1 Inclusive access to employment**

#### **Extract from London Plan Policy 3B.12: 'Improving the skills and employment opportunities for Londoners'**

Working with strategic partners the Mayor will co-ordinate and provide the spatial context alongside the range of initiatives necessary to improve the employment opportunities for London and remove barriers to employment.

### **SPG Implementation Point 11: Employment**

*The Mayor will and boroughs should ensure that development proposals (including extensions, alterations and changes of use) for any building that is used for employment purposes adopt and integrate the principles of inclusive design. This should include access to, into and within the building and its facilities, as well as appropriate car parking and access to public transport provision. The overarching London Plan Policy 4B.5 'Creating an inclusive environment' applies to all employment developments.*

- 3.1.1 One of the major barriers to employment, particularly for disabled people, is the inaccessibility of the workplace. London Plan Policy 3B.12: 'Improving the skills and employment opportunities for Londoners', aims to remove barriers to employment. Disabled people are frequently denied the opportunity to work due to discriminatory attitudes by employers, an inaccessible working environment, lack of access to education and training opportunities, lack of suitable information and support, and

assumptions that work is not a suitable place for disabled people. An analysis of the Labour Force Survey data for London 2001/02<sup>15</sup> concluded that disabled people are considerably disadvantaged both in terms of their access to the labour market and their experience when operating within it. Those who are active in the labour market face a relatively high risk of unemployment and when in work are more likely than others to be employed in lower paid occupations. Seventeen per cent of Londoners aged from 16 to state pension age are disabled (around 810,000 people<sup>15</sup>). Only 44 per cent of these people are in employment compared with 76 per cent of non-disabled people<sup>15</sup>. The chances of a disabled person being out of work rises with age, see 'Making age work for London: a scoping report on population ageing and productivity in London' Age Concern 2003<sup>16</sup>. To ensure that disabled people can be fully included in working life, new developments including office space and other employment locations should be fully accessible.

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#### *Further information*

The London Development Agency also has a major role to play in promoting equality of opportunity in employment and education and has an employment strategy and a skills and training strategy for disabled people. The London Development Agency is also planning to implement a strategy that promotes inclusive design. More details can be obtained from the London Development Agency at [www.lda.gov.uk](http://www.lda.gov.uk).

The JMU Access Partnership [www.jmuaccess.org.uk](http://www.jmuaccess.org.uk) is due to publish the Office Design Guide in the summer of 2004, which will provide advice on making offices accessible.

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### **3.2 Accessible housing**

*'...it makes it so much easier for my son to come and visit me. He's in a wheelchair...and it means that when he does he is able to use the facilities more easily...he's so independent and it was difficult in my last place where he couldn't access the toilet by himself...it's much better now.'*  
(*'Lifetime Homes in Northern Ireland'* Joseph Rowntree Foundation and Chartered Institute of Housing in Northern Ireland February 2002<sup>17</sup>.)

*'After the adaptations - oh my God, it was wonderful. Could go up and down stairs. It was just the independence - keeping your independence. Not always asking other people and being dependent on them.'*  
(*'The effectiveness and value of housing adaptations'* Francis Heywood The Policy Press and Joseph Rowntree Foundation 2001<sup>18</sup>.)

#### **London Plan Policy 3A.4: Housing choice**

Boroughs should take steps to identify the full range of housing needs within their areas. UPD policies should seek to ensure that:

- 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, such as students, older people, families with children and people willing to share accommodation
- all new housing is built to 'Lifetime Home'<sup>8</sup> standards
- ten per cent of new housing is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users.

The Mayor will investigate the feasibility of establishing a London register of accessible housing in both the public and private sector. In undertaking an assessment of housing needs, a borough should consult fully and ensure that the assessment includes the full range of different communities within the borough, such as black and minority ethnic communities, disabled people and older people and households with specialist or different requirements, and that such communities are consulted on how policy is derived from the needs assessment.

#### **SPG Implementation Point 12: Lifetime Homes**

*The Mayor will and boroughs should seek to ensure that all residential units in new housing developments are designed to Lifetime Home standards. These standards should be applied to all new housing, including conversions and refurbishments, and including blocks of flats, for both social housing and private sector housing, and should cater for a varying number of occupants.*

- 3.2.1 Many older and disabled people still live in unsuitable housing without access to essential amenities, or must move or undertake expensive adaptations when 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 needs of disabled people as residents or visitors, leads to discrimination and social exclusion. There is a severe shortage of accessible housing in London, including wheelchair housing. Policy 3A.4: 'Housing Choice' has been included in the London Plan to help redress this severe shortage.

- 3.2.2 Homes should be designed and built to be accessible for everyone, including young or old, single people or families, non-disabled or disabled people. Well designed, inclusive housing, which allows us all to make the same choices, will help to meet our housing needs, improve our health, reduce discrimination and create more balanced and inclusive communities.
- 3.2.3 It is much more cost effective to build new homes that are generally accessible to a wide range of people, than to build homes that are not future-proof, so become inappropriate to our changing needs. The government recognised this in 1999 by extending the requirements of Part M of the Building Regulations 1991<sup>5</sup> to include housing. This should increase the number of new homes built with design features that help all of us, but are of particular benefit to older people, children and their carers and people with physical impairments. Examples include electric sockets that can be reached without bending down, a downstairs toilet, additional space in the entrance hall, which makes it easier to manoeuvre a pushchair or wheelchair, wider doorways and a level entrance instead of the traditional step at the front door. These and other features are now a requirement in all new homes. These minimum standards still however, fall short of making the home easily accessible for all our changing housing needs. In recognition of this the Government announced in March 2004 a review of the Building Regulations with the aim of strengthening the regulations by introducing the Lifetime Home standards.
- 3.2.4 The Joseph Rowntree Foundation has undertaken a considerable amount of research and has successfully campaigned for the adoption of Lifetime Home standards. Lifetime Home standards provide accessible and convenient homes for a large segment of the population, from those with young children through to frail older people and those with temporary or permanent disabilities. The Northern Ireland Housing Executive and the Welsh Assembly have now adopted the Lifetime Home standards for all new social housing. Lifetime Homes have sixteen design features that ensure a new house or flat will be flexible enough to meet the existing and changing needs of most households. These standards are similar to the Part M Building Regulations 2000<sup>5</sup> requirements and to The Housing Corporation Scheme Development Standards<sup>19</sup> (which housing funded with Housing Corporation money must meet). However, the Lifetime Home standards<sup>8</sup> go a little further in their requirements for adaptability and flexibility. As these additions are minor, it is sensible and cost-effective to design all new homes to meet all of these requirements.
- 3.2.5 Lifetime Homes include a number of attractive features that help make the homes 'universal' in their appeal and application, yet do not substantially increase the construction costs. Lifetime Homes provide

residents with many advantages, giving private builders of new homes a marketing edge in relation to the second-hand stock with which they compete. Because Lifetime Homes will be suitable for older people (whose numbers are increasing rapidly) and for the vast majority of disabled people, as well as non-disabled people, they will have a wider market of potential buyers and residents, probably increasing their value and the ease with which they can be re-sold. The design standards are set out in the Joseph Rowntree Foundation report 'Meeting Part M and Designing Lifetime Homes' (1999)<sup>8</sup>, which is summarised in Appendix 4. The government review of the Building Regulations will however, consider whether the Lifetime Home standards are in need of updating. The review is likely to take two years.

#### **Case study: High density housing scheme built to Lifetime Home standards in Dallington Street, EC1**

New build and refurbished flats combines full Lifetime Home standards with a density of 700 habitable rooms per hectare. Numbers 1 to 16 refer to the 16 Lifetime Home standards (detailed in Appendix 4). The ground floor is commercial use and there is no car parking.



- 3.2.6 Homes built for general mainstream use but designed to meet these standards will contribute towards redressing the severe shortage of accessible housing in London. Planning applicants should be asked to provide an Access Statement which sets out the approach taken in both

the external and internal environment to deliver accessible homes and the opportunities and constraints of each proposal (see paragraph 2.5). Where elements of the scheme are unable to meet the full Lifetime Home standards solutions introduced to overcome the constraint should be explained in the Access Statement.

- 3.2.7 Meeting Lifetime Standards does not mean building to low densities. Housing has been built in the London Borough of Islington at a density of 700 habitable rooms per hectare while meeting all 16 Lifetime Home standards. This example and three other case studies are illustrated in 'Lifetime Homes Living Well Together achieving sustainable, flexible homes with high density neighbourhoods'<sup>20</sup> published by Habinteg/GML Architects /Joseph Rowntree Foundation /Greater London Authority in 2003.

### 3.3 Wheelchair Housing

#### **SPG Implementation Point 13: Wheelchair Housing**

*In all housing developments, including conversions and changes of use, the Mayor will and boroughs should seek to ensure that 10 per cent of the units are designed to be wheelchair accessible\*, or easily adaptable for residents who are wheelchair users. This percentage should be applied to both market and affordable housing, should be evenly distributed throughout the development, and cater for a varying number of occupants.*

*\*Note: If a borough wishes to vary this percentage, it should demonstrate to the Mayor that it has carried out a comprehensive recent assessment of need which demonstrates that a different proportion would be appropriate. The Mayor recommends that all London boroughs adopt the National Wheelchair Housing Association Group (NATWHAG) Wheelchair Housing Design Guide by Stephen Thorpe, published by the BRE in 1997.<sup>9</sup>*

- 3.3.1 Lifetime Homes, while offering the choice to people who have acquired an impairment to remain in their home, are not designed with the additional spatial requirements a wheelchair user needs. A proportion of homes will therefore also need to be built to be accessible and/or easily adaptable for wheelchair users and people with other physical and age related impairments who cannot adequately adapt a home that has been designed to Lifetime Home standards. Additional space is necessary in bathrooms and kitchens; sufficient space is also essential to safely recharge battery-powered wheelchairs and to store equipment. Disabled people often need an additional bedroom for a live-in personal assistant, or for someone to occasionally stay overnight. There are also a number of specific facilities, which must be installed in the home to enable a wheelchair user to live independently. For example, window fastenings

must be easily operated from a sitting position. Appendix 5 shows the minimum requirements of a wheelchair accessible dwelling which are in addition to Lifetime Home standards<sup>8</sup>. Habinteg Housing Association is currently reviewing these standards.

- 3.3.2 There is very little awareness about the substantial scale of the unmet need for wheelchair accessible homes. Many disabled people face considerable difficulties finding suitable housing which meets their specific access needs. John Grooms Housing Association conducted a survey of their tenants in 2002 and found that many wheelchair users and their families have to 'endure inhumane conditions, some people are literally imprisoned in their own homes' ([www.johngrooms.org.uk](http://www.johngrooms.org.uk)). Sixty-seven per cent of people surveyed by John Grooms spent over three years in inadequate and often dangerous accommodation while waiting for accessible housing, and 41 per cent of those surveyed waited over five years. Habinteg Housing Association have found that most wheelchair users live in households containing more than one person and that the highest levels of demand for wheelchair accessible homes is for larger family units.
- 3.3.3 The London Plan target of 10 per cent for wheelchair accessible housing has been set to address the backlog of existing need, as well as addressing new need likely to arise over the next 10 years. The target would produce around 23,000 new wheelchair accessible homes over the next 10 years. This would include 14,000 to meet the existing unmet need; the remaining 9,000 would contribute to meeting future need. The key findings from the results of the GLA's 2002 London Household Survey, based on interviews with 8,000 households, supports the 10 per cent figure. The results of the survey have been grossed to the GLA household projections for 2002 based on the 2001 Census of 3,048,000 households. The survey found that:
- 6 per cent of all households in London contain someone with a physical disability (who may find it difficult to cope with ordinary housing)
  - 7 per cent (around 13,000) of these households are living in inaccessible housing and need a wheelchair accessible home
  - 12 per cent of households in local authority accommodation and 8 per cent of households in housing association accommodation contain someone with a physical disability (who may find it difficult to cope with ordinary housing)
  - 29 per cent of all households with a physical disability say they need to move within the next five years



- 44 per cent of people with a physical disability, who need to move in the next five years, said that they wanted to buy their own home, when asked about their tenure preference.

3.3.4 If a borough wishes to vary the percentage, it must demonstrate to the Mayor that it has carried out a comprehensive recent assessment of need which demonstrates that a different proportion would be appropriate. Historically, it has proven very difficult to obtain accurate and up-to-date estimates for wheelchair accessible housing. It is therefore, recommended that the 'Pathways to Accessible Housing' planning tool developed by the Papworth Trust and Habinteg Housing Association in 2001<sup>21</sup> ([www.accessiblehousing.org.uk](http://www.accessiblehousing.org.uk)) is used to obtain this figure. This will ensure that all London boroughs estimate their wheelchair housing need in a similar and comparable way. (The current model only however, provides estimates of the number of wheelchair accessible homes in the social housing sector, and does not estimate need for private sector dwellings, for which additional estimates would be needed.) The Greater London Authority has conducted a questionnaire survey to collect information about the current level of supply and demand for accessible and adapted housing in London, as part of the current investigation of the feasibility of setting up a London wide register of accessible housing.

**Case study: Wheelchair bungalow built by Habinteg Housing Association on a brownfield site in Southwark.**



Quote from son about the move: *'The property was fantastic. All the light switches and low level fittings made it possible for dad to do more things for himself, he was also able to go out into the garden. Moving there was like a new lease of life for him.'*

- 3.3.5 The ODPM and Department of Health (DH) issued in February 2003 a consultation paper on Delivering Adaptations<sup>22</sup>. It gives advice to local authorities on how they can establish a first class service to deliver adaptations to the homes of disabled people. It recognises that planners should interpret planning requirements sensitively so that adaptations are not delayed, and should work effectively with housing, health and social services to ensure that disabling environments are modified to restore independent living, privacy, confidence and dignity to individuals and their families.

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*Further information on accessible housing*

Habinteg Housing Association launched a film in April 2004 about Lifetime Homes, which looks at examples and features the people who design, build and live in Lifetime Homes. Further details can be obtained from the web site [www.lifetimehomes.org.uk](http://www.lifetimehomes.org.uk).

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### 3.4 Inclusive access to public buildings

#### **London Plan Policy 3A.15: 'Protection and enhancement of social infrastructure and community facilities'**

UDP policies should assess the need for social infrastructure and community facilities in their area, including children's play and recreation facilities, services for young people, older people and disabled people, as well as libraries, community halls, meeting rooms, places of worship and public toilets. Adequate provision for these facilities is particularly important in major areas of new development and regeneration.

Policies should seek to ensure that appropriate facilities are provided within easy reach by walking and public transport of the population that use them. The net loss of such facilities should be resisted.

#### **SPG Implementation Point 14: Public Buildings**

*The Mayor will and boroughs should ensure that proposals for all public buildings, including shops, restaurants, community buildings, health, education, culture and the arts, and leisure including tourist, sport, play and youth facilities provide a high standard of inclusive access. The overarching London Plan Policy 4B.5: 'Creating an inclusive environment' applies to all public buildings.*

- 3.4.1 Access to community services and social infrastructure including libraries, community halls, meeting rooms, places of worship and public toilets can

also be difficult due to the poor design of the building. London Plan Policy 3A.15: 'Protection and enhancement of social infrastructure and community facilities' recognises the importance of protecting and enhancing such facilities.

### 3.5 Health

#### London Plan Policy 3A.17 Health objectives

UDP policies should promote the objectives of the NHS Plan, Local Delivery Plans and Modernisation Programmes and the organisation and delivery of health care in the borough. This should be in partnership with the strategic health authorities, primary care trusts and Local Strategic Partnerships and with voluntary and community organisations involved in delivering health services.

#### SPG Implementation Point 15: Health

*The Mayor will and boroughs should endeavour to work with the Health Authority, National Health Service trusts and primary health care trusts to secure the provision of good quality health facilities that are well located and accessible to all users. The overarching London Plan Policy 4B.5 'Creating an inclusive environment' applies to all health buildings.*

- 3.5.1 The inaccessibility of many of London's health buildings creates major difficulties for disabled and older Londoners. The London Health Commission report 'Health in London'<sup>23</sup>, a review of the London Health Strategy high level indicators, found that disabled people fare worse on all indicators for which relevant information is available. For example, disabled people are four times more likely than non-disabled people to find dental practices unsuitable or inaccessible, and twice as likely to be unable to access their local doctor. The NHS Plan recognises the specific health needs of disabled people and improving health and reducing inequality is a key priority for all government departments.
- 3.5.2 The London Plan has a statutory duty to promote the health of Londoners and this is one of its three key crosscutting themes. It sets out the strategic planning framework for ensuring provision is made for doctors surgeries, health centres and hospital facilities across London, and promotes opportunities to maintain and enhance public health. All new, extended and refurbished health facilities should be designed to provide inclusive access.

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*Further information on accessible health facilities*

Policy advice is contained in the Royal College of Physicians report: 'Disabled People Using Hospitals - A Charter and Guidelines' (1998)<sup>24</sup>.

Design guidance can be found in National Health Service Estates publications:

- Health Facilities Note 20 'Access Audits of primary healthcare facilities' (1997)<sup>25</sup>
  - Health Facilities Note 14 'Disability Access' (1996)<sup>26</sup> ([www.nhs.gov.uk](http://www.nhs.gov.uk)),
  - and in BS8300 2001<sup>6</sup>.
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**Case study: Waltham Forest Access Group access audit of Whipps Cross Hospital**

In 1994, Waltham Forest Access Group worked with Health Trust Managers to carry out a major survey of Whipps Cross Hospital. The report made over 100 recommendations, some of which have been implemented including accessible toilets, lower reception counters, parking, signage and wayfinding.

### 3.6 Education

**Extract from London Plan Policy 3A.21 Education facilities**

Boroughs should take inclusive design into account when considering the provision and/or expansion of educational facilities.

**SPG Implementation Point 16: Access to Education**

*Proposals for educational facilities should aim to achieve the highest standards of safe, easy and inclusive access for all people regardless of disability, age or gender. The overarching London Plan Policy 4B.5 'Creating an inclusive environment' applies to all education buildings.*

- 3.6.1 Disabled people are less likely than non-disabled people to have access to education. An analysis of the labour force survey 2001/02<sup>15</sup> found that only 34 per cent of disabled 16-24 year olds in London participate in some form of education compared with 50 per cent of young non-disabled Londoners. Only 18 per cent of disabled people have higher-level qualifications compared with 34 per cent of non-disabled people. Thirty-nine per cent of disabled people have no educational qualifications compared with 19 per cent of non-disabled people. A Contact A Family education web-based survey in January 2003 found that 34 per cent of

parents believed that their disabled child had definitely or probably been discriminated against in the education system. Inaccessible educational buildings contribute to this discrimination. Disabled parents, teachers and support staff also face barriers in accessing the education system.

- 3.6.2 Following the enactment of the Special Educational Needs and Disability Act 2001<sup>27</sup> (SENDA), new rights and duties have been introduced, which may result in an increase in the number of planning applications local authorities receive for proposals to improve physical access to school and educational buildings. From September 2002 schools and Local Education Authorities (LEAs) had a duty to plan strategically to increase access to schools for disabled pupils over time. By April 2003 all schools (including maintained, non-maintained and independent schools), should have prepared an accessibility plan. The plan should include short, medium and long term strategies to improve the physical environment of the school, in order to increase the accessibility of the premises for current and future pupils who may be disabled. Copies of the accessibility plan must be made available to the public on request. Local authorities' accessibility strategies and school's accessibility plans last initially for three years; they should be reviewed and revised as necessary.
- 3.6.3 Since 1996, the Schools Access Initiative (SAI) has provided funding to make existing mainstream schools more accessible to disabled children and to children with special educational needs. So far over 6,000 schools have benefited from the Initiative. The SAI funds projects such as:
- the installation of lifts, stair lifts, ramps and accessible toilets to help children with mobility impairments;
  - the carpeting and acoustic tiling of classrooms to benefit hearing impaired pupils; and
  - the provision of blinds and paint schemes to benefit visually impaired children.
- 3.6.4 All new school buildings have to comply with the Building Regulations 2000 and the Education (School Premises) Regulations 1999. Designers should, however, endeavour to exceed these minimum standards and aim to achieve the highest standards of safe, easy and inclusive access.

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*Further information on educational buildings*

'Accessible Schools: Planning to increase access to schools for disabled pupils' (2002)<sup>28</sup> and the Code of Practice on SENDA 2001<sup>27</sup> is available from the Department for Education and Skills (DfES) [www.DfES.gov.uk](http://www.DfES.gov.uk).

Details on the design of schools can be found in:

- BS 8300 2001<sup>6</sup>,
  - Building Bulletin 91 'Access for disabled people to school buildings; management and design guide' DfEE 1999<sup>29</sup>,
  - Building Bulletin 94 'Inclusive school design; accommodating pupils with Special Educational Needs and disabilities in mainstream schools' DfEE 2001<sup>30</sup>.
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### 3.7 Shopping

#### **SPG Implementation Point 17: Shopping**

*In line with London Plan Policy 4B.5 'Creating an inclusive environment' UDP policies should ensure that all retail proposals meet the highest standards of accessibility and inclusion and that all new shop fronts are designed to provide inclusive access.*

*Boroughs should seek to improve the accessibility of town centres by reviewing facilities and implementing improvement schemes. Boroughs should seek to undertake access audits in conjunction with local access groups, and prepare and implement Access Action Plans.*

*The Mayor would like to see an increase in the number of Shopmobility schemes in London, and recommends that boroughs undertake an assessment of the feasibility of introducing these schemes in their areas.*

- 3.7.1 Although much progress has been made in making town centres more accessible, disabled people remain disproportionately excluded from many shopping activities in London. Neither Knightsbridge nor Oxford Street, the two international shopping centres in London, are easily accessible to disabled people, and many of the metropolitan centres do not yet provide a fully inclusive environment. The provision in some town centres of level entrances, wide automatic doors, seating, lifts and parking has improved access but many centres can still be difficult to use. Paragraph 3.225 of the London Plan stresses that town centres should provide facilities such as accessible public toilets, affordable childcare and Shopmobility

schemes. Incorporating inclusive design principles can be critical, for example uniform design and the lack of orientation points and wayfinding clues can create insurmountable barriers for visually impaired people. The Mayor supports paragraph 3.28 of draft PPS6 Planning for Town Centres<sup>31</sup> which states that “as a principle of good layout and design, developers should be encouraged to orientate new development so that it fronts the street, provides level access and has the entrance closest to the primary shopping area”.

- 3.7.2 With the introduction of shopping malls and pedestrianised areas, it has become increasingly difficult for people with a mobility impairment to access all areas of a town or city. Although not a substitute for good access Shopmobility schemes can help overcome some of the barriers created in shopping areas. There is now a UK network of Shopmobility schemes, which help to promote equality of access and encourage independence and confidence. Lending manual wheelchairs, powered wheelchairs and powered scooters to members of the public with limited mobility enables anyone, young or old, whether their disability is temporary or permanent, to shop and visit leisure and commercial facilities within the town, city or shopping centre. Some Shopmobility schemes also offer escorts to assist blind and partially sighted people and others to do their shopping.
- 3.7.3 There are 17 Shopmobility schemes within the Greater London area, nearly all are, however, in outer London suburban town centres, such as Kingston and Croydon. Apart from a scheme in Camden High Street launched by Camden Council in October 2002, there is no Shopmobility scheme in central London. This deficiency, combined with the poor parking provision for disabled people in central London, the lack of accessible public transport and accessible public toilet facilities, excludes disabled people from some of London’s best shopping streets. Boroughs have a major role to play in ensuring that everyone regardless of disability, age or gender, can participate equally in the borough’s shopping centres. Undertaking access audits in conjunction with the local access group can help to identify deficiencies in shopping provision. Issues to consider when implementing Access Action Plans include designated car parking bays, street accessibility, shop front design, Shopmobility schemes, the provision of accessible public toilets and accessible public transport.
- 3.7.4 Although many shops have been made more accessible as the needs of disabled people are better understood, there are still many examples of new shop fronts retaining the original single step at the entrance. Boroughs should include policies in their Unitary 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 with easy to grip door handles, and colour contrast at eye level on fully glazed doors.

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#### *Further Information on shopping*

The route audit in the annex to the Department of Transport Local Government and Regions guide 'Going to Town - Improving Town Centres' 2002<sup>32</sup> provides advice on issues to consider when undertaking access audits.

The Disability Rights Commission [www.drc.org.uk](http://www.drc.org.uk) has issued 'Making access to goods and services easier for disabled customers. A practical guide for small businesses and other small service providers'<sup>33</sup> along with a series of booklets illustrating case studies of small shops including a café, hairdressing salon, newsagent, and clothes shop, to help bring the DDA to life for small shops.

The National Federation of Shopmobility supports existing schemes throughout the UK and encourages the development of the Shopmobility network. A list of schemes in Greater London can be seen on their web site ([www.justmobility.co.uk/shop](http://www.justmobility.co.uk/shop)).

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### **3.8 Public toilet facilities**

#### **Extract from London Plan Policy 3A.16 Protection and enhancement of social infrastructure and community facilities**

Adequate provision for public toilets is particularly important in major areas of new development and regeneration.

#### **SPG Implementation Point 18: Public Toilet Facilities**

*To address the shortage of accessible public toilet facilities in London, the Mayor will and boroughs should seek to ensure that proposals for retail, leisure, cultural, sport and community facilities provide suitable public toilets for all the community. Boroughs should also make an assessment of provision in public areas and give consideration to addressing any shortfalls.*

- 3.8.1 The lack of accessible public toilets prevents many disabled and older people and carers of young children participate in London life. Many public toilets have been closed and replaced by automatic public toilets that are not always wheelchair accessible. Those that remain are often down flights of stairs. To help redress the shortage of accessible public toilets, boroughs should ensure that a sufficient number are provided in new developments.

### 3.9 Culture and the arts

#### **Extract from London Plan Policy 3D.4:**

##### **Development and promotion of arts and culture**

In considering proposals for cultural facilities UDP policies should ensure that facilities are accessible to all sections of the community, including disabled people.

#### **SPG Implementation Point 19: Culture and the arts**

*The overarching policy 4B.5 'Creating an Inclusive Environment' applies to all development relating to cultural, sport, leisure and play facilities. The Mayor will and boroughs should ensure that these types of development meet the highest standards of accessibility and inclusion, and that disabled people are given the opportunity to participate equally in these mainstream activities. If in exceptional circumstances the principles of inclusive design cannot be fully met in an existing building this should be set out in the Access Statement submitted with the planning application and suitable alternative proposals to overcome the barriers explained.*

- 3.9.1 One of the key objectives of the Mayor's Culture Strategy is to ensure that all Londoners have access to culture in the city. Everyone should be able to participate in the arts, whether as creators, facilitators, participants or audience members. However, disabled people as audiences and professionals are still denied access to many arts and cultural venues in London, due to the poor physical access and facilities in the building, management practices and procedures, and discriminatory attitudes. The Museums, Libraries and Archives Council in its strategic plan for action recognises that people cannot engage with or use collections and resources unless they have physical, sensory, intellectual, financial and cultural access to them. Organisations such as the Museums and Galleries Disability Association (a not-for-profit organisation promoting the rights of people with a disability to enjoy museums, galleries and heritage sites. [www.magda.org.uk](http://www.magda.org.uk)) have done much work on physical access but there is still a lot of work to do to overcome all the barriers which prevent people from using museums, libraries, arts and cultural venues. Participation in outdoor street events and festivals can be particularly difficult unless inclusive access has been fully addressed in advance. Events often take place in community buildings, schools and church halls, many of which have very poor access.
- 3.9.2 The Arts Council estimated in 2001 that the spending power of disabled people nationally was over £45 billion, so it is not economically viable to deny disabled people access to the arts.

- 3.9.3 An increasing number of venues now have sign language interpreted events, produce information in accessible formats, and use audio description and captioning. However, physical access and facilities often remain inadequate. The lack of wheelchair spaces can affect young people's access to the cinema. Despite progress in recent years, disabled people continue to be marginalized, with poor representation of disabled people in the film and television industries.
- 3.9.4 Boroughs should ensure that proposals are adequately assessed in terms of the access and facilities provided for disabled people. The Arts Council has developed an exemplary model for assessing access provision in arts proposals<sup>34</sup>. This comprehensive toolkit includes attitudinal, physical and intellectual disability access checklists and access guidance notes to help make projects the best they can be in terms of access.

#### **Case study: The London Disability Arts Forum**

Filmmaker Raina Haig: 'I'm in seventh heaven. This is the first time in my experience of well over a decade in film that I'm at a film festival and feeling fully involved, fully absorbed rather than feeling as if I'm sitting on the outside.'

The relocation of the Disability Film Festival to the NFT in 2002 saw the Disability Arts community move onto the mainstream stage without losing its identity, which exposed the NFT to disability culture. In the run-up to the festival, disability equality training was provided for middle management, technical, support, and front of house staff. All films were BSL-interpreted, fully audio-described and soft-subtitled. A palantype transcription of the panel discussions was projected on screen as the speakers were talking. However there were still some access issues such as insufficient wheelchair accessible toilets and car parking bays and difficult access to the café from cinema 2.

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#### *Further information on culture, and the arts*

The Arts Council's Disability Access Checklists and Access Action Plan for the Arts Capital Programme<sup>34</sup> in June 2002 can be viewed at [www.artscouncil.org.uk](http://www.artscouncil.org.uk).

The Museums, Libraries and Archives Council has published the Disability Portfolio<sup>35</sup> a collection of 12 guides on how best to meet the needs of disabled people as users and staff in museums, libraries and archives and can be viewed at [www.resource.gov.uk](http://www.resource.gov.uk).

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### 3.10 Leisure, sport and play

#### **Extract from London Plan Policy 3D.5 Sports facilities**

In considering proposals for sports facilities boroughs should ensure that facilities are accessible to all sections of the community, including disabled people.

- 3.10.1 Disabled people want to participate and compete in a wide range of sports but are frequently frustrated by poor or non-existent access and facilities. London should have a wide range of high quality, affordable sports facilities accessible to all sections of the community. PPG 17 2002<sup>36</sup> requires boroughs to undertake audits of open space, sport and recreation facilities. These audits should address the needs of all users, regardless of disability, age or gender. Comprehensive design advice is now available from Sport England. The guidance note 'Access for Disabled People'<sup>37</sup> sets out minimum requirements for achieving good access to all sports facilities.
- 3.10.2 In the past, the needs of disabled children when using play spaces have largely been neglected and their interests have not been fully considered in the planning and design of play spaces. To address this deficiency, in November 2003, the ODPM launched 'Developing Accessible Play Space: A Good Practice Guide'<sup>38</sup>, which adopts a social model approach to understanding disability and impairment. It recommends that developers should focus on 'making the environment fit the child' and it provides examples of how 'careful attention to design can help to ensure that play spaces are inclusive, comfortable and appealing to disabled children and their families'.
- 3.10.3 The Mayor has committed, in the Children and Young People's Strategy<sup>39</sup>, to adopting a Children's Play Strategy for London. This Play Strategy, to be developed by the organisation London Play and others (including children and young people themselves) will include guidance on developing inclusive and accessible play environments and provision.

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#### *Further information on leisure, sport and play*

Detailed technical advice on sports facilities can be found in Sport England's design guide note 'Access for Disabled People' published in December 2002, which can be viewed at [www.sportengland.org](http://www.sportengland.org).

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### 3.11 Tourism

#### Extract from London Plan Policy 3B.10 Tourism Industry

The Mayor, working with strategic partners, will

- improve the tourism environment, visitor information and management to provide a better visitor experience and manage the pressure on key tourism locations.

#### SPG Implementation Point 20: Tourist Facilities

*To address the shortage of accessible hotel accommodation in London, the Mayor will and boroughs should require that all proposals for hotels meet the highest standards of accessibility and inclusion. The overarching London Plan Policy 4B.5 'Creating an inclusive environment' applies to hotels and other tourist facilities.*

- 3.11.1 Many existing tourist attractions and hotels in London are still not fully accessible to disabled people. This prevents many disabled people from visiting London and enjoying the facilities available. English Tourist Council (ETC) research shows that there are approximately 2.5 million potential disabled holidaymakers in the UK, and millions more abroad. The ETC has developed the National Accessible Standard (NAS)<sup>40</sup> for serviced and self-catering accommodation, which aims to give disabled people an easy to understand accessible rating system. Using the standards in the NAS information pack will help the tourist industry to make accommodation more accessible. Boroughs should be aware of these standards and ensure that proposals in their areas comply with or exceed these standards. Problems can arise particularly where large numbers of disabled people need accommodation, such as delegates attending conferences, as many hotels may have only one or two fully accessible bedrooms, and one or two wheelchair accessible public toilets.

#### Case study: Great Eastern Hotel, City of London

After refurbishment, the main entrance into the Great Eastern Hotel in Liverpool Street is level with the pavement, so easily wheelchair accessible.

New lifts have been installed to give access to all floors of the hotel; ramps installed within floors to provide step free access to most bedrooms, a platform lift installed to give step free access to the raised ground floor restaurant and 10 per cent of bedrooms have been fitted out to be fully wheelchair accessible. Although some compromises were necessary, a previously inaccessible hotel is now useable by disabled people.

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#### *Further information on tourism*

The English Tourism Council updated their National Accessible Scheme for serviced and self-catering accommodation in 2002<sup>40</sup>. An information pack can be obtained from [www.accessibletourism.org.uk](http://www.accessibletourism.org.uk).

The Mayor has published in 2002 a Plan for Tourism in London and a three year London Tourism Action Plan.

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### 3.12 The public realm

#### **Extract from London Plan Policy 4B.2**

##### **Promoting world-class architecture and design**

The Mayor will work with partners to prepare and implement:

- design guidelines for London
- a public realm strategy for London to improve the look and feel of London's streets and spaces.

#### **Extract from London Plan Policy 4B.4**

##### **Enhancing the quality of the public realm**

The Mayor will, and boroughs should work to ensure that the public realm is accessible, usable for all, meets the requirements of Policies 3A.14 (Addressing the needs of London's diverse population) and 4B.5 (Creating an inclusive environment) and that facilities such as public toilets are provided. Planning applications will be assessed in terms of their contribution to the enhancement of the public realm.

#### **SPG Implementation Point 21: Access Action Plans**

*The Mayor recommends that boroughs produce Access Action Plans to identify projects and proposals to improve the external environment and the public realm, including parks and open spaces to make them fully accessible to disabled people.*

- 3.12.1 Making the roads and pavements and the spaces between buildings fully accessible is as important as making the buildings themselves accessible. However, despite comprehensive guidance since 1991 ('DU1/91 The provision of dropped kerbs and tactile paving' Disability Unit Department of Environment 1991<sup>41</sup>, 'Reducing Mobility Handicaps in the Pedestrian Environment' The Institution of Highway and Transportation 1991<sup>42</sup>), London's streets, pavements and pedestrian crossings can still create

insurmountable barriers to many disabled and older people. Poor workmanship and maintenance (broken paving stones), poor choice of materials (uneven cobbles or wide jointing in small unit paving), lack of dropped kerbs, incorrectly laid tactile paving (often too much and of the wrong profile), lack of easy to use seating (no arms or backrests and too low), all contribute to making the external public realm inaccessible. The challenge is to develop innovative and creative solutions that integrate traffic management within a high quality accessible public realm.

- 3.12.2 Much can be done to improve this situation. One way of planning improvements is to undertake access audits in conjunction with the local access group and produce Access Action Plans, which set targets and dates for implementing improvements. Access Action Plans could include details of improvements such as the installation of dropped kerbs and tactile paving, making pedestrian crossings safe by installing audible and tactile signals, the removal of obstacles on the footway, the installation of seats along routes for people to use to rest, the provision of signs and other wayfinding and orientation tools. They could also be used to identify access improvements to shops and town centre facilities for use by town centre managers. Access Action Plans can also be used to compile information about the lack of accessible public toilets and other community facilities in the borough, and hence as a source of projects suitable for Section 106 Agreements and developers' contributions. Many authorities are already producing plans in preparation for the 2004 provisions of the Disability Discrimination Act (DDA) 1995.
- 3.12.3 As service providers assess how to ensure they are not discriminating against disabled people, there is likely to be an increase in planning applications leading up to October 2004 for external ramps at entrances to buildings, some of which are likely to be on the public highway. Boroughs should be prepared for such applications and introduce policies and procedures to co-ordinate planning and highway requirements.

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*Further information about the external environment*

The government's 'Inclusive Mobility A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure'<sup>7</sup>, published in October 2002, includes detailed standards on the design and layout of street furniture, the layout of footways and crossing points - including dropped kerbs, tactile paving and facilities at signal controlled crossings, street lighting, signage, and public toilets. A copy can be viewed at [www.mobility-unit.dft.gov.uk](http://www.mobility-unit.dft.gov.uk).



Streetscape Guidance for the Transport for London Road Network (TLRN)<sup>43</sup> is currently being drafted (it should be available from TfL in the summer of 2004 [www.tfl.gov.uk/streets](http://www.tfl.gov.uk/streets).) and will provide advice on the design of streetscape improvements to enable those responsible for the TLRN to create high quality streetscapes through the application of specific design principles and the use of preferred materials and products. The Guidance will highlight relevant policies and guidance that have an impact on the quality of the streetscape and offer guidance on how potentially conflicting requirements should be resolved. The Guidance will act as a 'gateway' to other local, regional and national good practice and examples, plus be a source of information to those outside TfL.

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### 3.13 Open spaces

#### **Extract from London Plan Policy 3D.11: Open space strategies**

Boroughs should, in consultation with local communities, the Mayor and other partners, produce open space strategies to protect, create and enhance all types of open space in their area.

To assist with such strategies the Mayor has produced a Guide to Preparing Open Space Strategies<sup>44</sup>.

- 3.13.1 Access to existing open spaces can be widely improved by dealing with environmental barriers such as narrow and uneven footpaths, inaccessible public transport, and the lack of facilities such as accessible public toilets and parking for disabled people. Young disabled people report that public transport constitutes an important barrier to their physical access to open space. Parental anxiety about safety in open spaces can also result in disabled children facing particular restrictions.
- 3.13.2 The creation and management of high quality public spaces is essential to delivering an urban renaissance in London. The Mayor will encourage and promote good practice in the management and enhancement of London's open spaces, through guidance, information and best practice examples. His 100 Spaces for London programme seeks to show how new public spaces can make a real difference to individual quality of life, community vitality and London-wide liveability. These projects will strive for excellence in design - design which is inclusive, enhances the quality of the public realm, respects local context and meets the needs and aspirations of local communities.

3.13.3 The Best Practice Guide<sup>44</sup> to preparing open space strategies states that the following should be included in strategies for creating and enhancing open space:

- a comprehensive audit of all open space
- assessments of local needs and the value of existing open space, including for cultural, educational, structural, amenity, health and biodiversity value
- protection by appropriate designation on UDP maps
- prioritisation of investment to address identified needs and deficiencies
- identification of opportunities for improving access to and accessibility to open spaces, particularly by promoting public transport, cycling and walking and improving access and facilities for disabled people
- identification of opportunities for improving linkages between open spaces and the wider public realm.

3.13.4 As recommended in SPG Implementation Point 21 on Access Action Plans, audits of parks and open spaces should identify improvements needed to make them accessible and inclusive to all potential users, regardless of disability, age and gender.

### 3.14 Access to the countryside

#### Extract from London Plan Policy 3D.13

#### London's countryside and the urban fringe

The Mayor will work with strategic partners to improve access to the countryside and the quality of landscape in the urban fringe.

#### SPG Implementation Point 22: Access to the countryside

*Boroughs should seek to assess how accessible public rights-of-way are to disabled people and introduce strategies and enhancement schemes, in conjunction with local access groups and local organisations of disabled people, to ensure that everyone has equal access to the facilities available.*

3.14.1 Many people experience difficulties in gaining access to the countryside, particularly disabled people. The London Plan in paragraph 3.262 states that boroughs should address barriers to access in rural areas, including physical barriers and introduce strategies and enhancement schemes that ensure that everyone has equal access to the recreational opportunities in London's countryside. Consideration should be given to the location of bus stops and public transport facilities, parking bays, toilets, safe and easy routes, dropped kerbs, path surfaces, seating, lighting, board walks, play equipment, tactile and audio maps and information.

- 3.14.2 The Countryside Agency has been working with the Fieldfare Trust to build on previous work, which recognises that by providing more opportunities for disabled people, the countryside will become more accessible to a much wider sector of the population. Guidance for countryside managers based on six pilot projects on improving access for all in the countryside is due for publication in 2004. The Countryside Agency is also carrying out a diversity review and will by 2005 draw up a plan of action of how to encourage more disabled people, more black and minority ethnic people, more people from inner cities, and more young people to visit the countryside and participate in outdoor activities.

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*Further Information on Access to the Countryside*

Detailed standards are included in the British Telecom/Fieldfare Trust 'Countryside for All' guidelines (1997)<sup>45</sup>, Countryside Agency's report 'Sense and Accessibility - How to improve access on countryside paths, routes and trails for people with mobility impairments'<sup>46</sup> and the guide 'Paths without prejudice' 2001<sup>47</sup>.

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### 3.15 London's historic environment

**Extract from London Plan Policy 4B.11: Heritage conservation**

Boroughs should encourage and facilitate inclusive solutions to providing access for all, to and within the historic environment.

**Extract from London Plan Policy 4B.12:  
Historic conservation-led regeneration**

The Mayor will, and boroughs should, support schemes that make use of historic assets and stimulate environmental, economic and community regeneration where they promote inclusiveness in their design.

**SPG Implementation Point 23:**

**Inclusive access to and within the historic environment**

*The overarching London Plan Policy 4B.5 'Creating an inclusive environment' applies to the historic environment. Boroughs should endeavour to make this clear to applicants and refer them to the Implementation Points in this SPG. In exceptional cases where inclusive design principles cannot be fully met the reasons should be justified in the accompanying Access Statement.*

- 3.15.1 London's historic buildings, places and spaces have often been a no-go area for many, as their diverse needs were not considered in the past.

Unfortunately despite a growing awareness of the way buildings can exclude, access improvements have not always been incorporated into the refurbishment of historic buildings. There are now, however, a growing number of historic buildings that have been made accessible, proving that access can be achieved when creative and innovative solutions are implemented.

- 3.15.2 Government advice in PPG 15<sup>48</sup> and English Heritage in their guide 'Easy Access to Historic Properties'<sup>49</sup> (currently being updated), recognise that listed buildings can be made more accessible, while still preserving and enhancing their character. In 2001 English Heritage adopted the following disability access policy: "English Heritage is committed to improving access to the historic environment, by helping other agencies and organisations to adopt creative and sensitive solutions in the adaptation and management of their properties, and by adopting best practice itself, in relation to the properties it manages, the services it provides, and the people it employs."

#### **Case study: Guildhall Crypts, City of London**

A steep staircase in the ground floor entrance of Guildhall leads down into the medieval East Crypt, making access for all but the very agile difficult. A further five steps lead up into the West Crypt. A wheelchair accessible fully automatic lift has now been installed which gives step free access between the ground floor main entrance and the lower ground floor West Crypt and a platform lift has been installed to give step free access between the West and East Crypts. Both lifts can be operated by anyone. Handrails and contrast nosings have been installed on the adjacent stairs. A fully inclusive solution to a difficult problem in a Grade 1 listed building and a Scheduled Ancient Monument; the scheme received a mention in the Civic Trust Awards in 2001.

The Corporation of London issued in March 2004 Planning Advice Note 6 'Improving Access to Listed Buildings in the City of London'<sup>50</sup> which illustrates some of the issues that owners, developers and architects have when considering access and alterations to listed buildings.

### 3.16 Transport

#### **London Plan Policy 3C.9: 'Increasing the capacity, quality and integration of public transport to meet London's needs'**

The Mayor will work with strategic partners to increase the capacity of public transport in London by up to 50 per cent over the plan period and to improve the integration, reliability, safety, quality, accessibility, frequency and attractiveness of the public transport system.

#### **Extract from London Plan Policy 3C.15: Road scheme proposals**

All road schemes in London should:

- improve safety for all users
- improve conditions for pedestrians, cyclists, disabled people

#### **SPG Implementation Point 24:**

##### **Borough Transport Local Implementation Plans**

*The London Plan policies on inclusive transport are consistent with the policies set out in the Mayor's Transport Strategy. UDP policies should be in general conformity with the London Plan and where appropriate the Mayor's Transport Strategy. Boroughs Local Implementation Plans (LIPs) should reflect the inclusive transport policies in the Mayor's Transport Strategy and as far as practical LIPs should be consistent with borough UDPs.*

#### **SPG Implementation Point 25: Public transport infrastructure**

*The Mayor will and boroughs should encourage applicants in any development that effects existing or provides new public transport facilities to exceed the minimum standards of reasonable provision for disabled people and aim to achieve the highest standards of safe, easy and inclusive access for all people, regardless of disability, age or gender. It will also be important to ensure that the various transport modes are integrated in a fully inclusive way.*

- 3.16.1 Despite the introduction of low-floor buses and the installation of lifts at some Underground stations many disabled and older Londoners still face difficulties using London's public transport system. Disabled children and young people and parents of young disabled children also experience particular barriers when trying to access London's public transport system. Some of the new low floor buses have reliability problems with the ramps and can only take one wheelchair user at a time so wheelchair users cannot travel together on the buses. More people are now using scooters and larger powered wheelchairs which has implications, for example with regard to the size of lifts and circulation space and the need for recharging points and storage areas. Only 29 out of 253 underground

stations owned by London Underground currently have step-free access; even those stations with lifts are not always easy to use (for example at Bank station three lifts must be used to gain step free access from the Docklands Light Railway to street level and the user must be accompanied by a member of London Underground staff). London Underground's step free access development plan 'Unlocking London for All'<sup>51</sup> outlines the plans for a key network of over 100 underground stations with step free access by 2020.

- 3.16.2 The Mayor is committed to making public transport and the pedestrian environment more accessible to everyone. The Mayor supports the advice in Planning Policy Guidance Note 13<sup>52</sup>, which states that the needs of disabled people as pedestrians, public transport users and motorists must be taken into account in the implementation of planning policies, traffic management schemes, and in the design, construction and management of individual developments.
- 3.16.3 Removing physical, attitudinal and communication barriers, and building in accessibility for all, should be a standard requirement of all development proposals. The Mayor's Accessibility Action Plan (Annex 6 of the Mayor's Transport Strategy (2001)<sup>53</sup>) sets out policies and proposals regarding accessible transport services, which boroughs should take into account when reviewing their Unitary Development Plans. Implementing the Mayor's vision for a sustainable, exemplary world city provides an immense opportunity to improve the accessibility of London's public transport system for disabled and older people, and for children and their parents and carers, while recognising that for many, cars will remain an essential and irreplaceable means of mobility.
- 3.16.4 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. Road scheme proposals should also be designed to be fully accessible. (See paragraph 3.12 on the public realm and SPG Implementation Point 21: Access Action Plans.)

### 3.17 Walking and cycling

#### Extract from London Plan Policy 3C.20

##### Improving conditions for walking

UDP policies should:

- ensure that safe, convenient, accessible and direct pedestrian access is provided from new developments to public transport nodes and key land uses, taking account of the need to connect people to jobs, to town centres and to schools
- identify, complete and promote high quality walking routes including the six strategic walking routes identified in the Mayor's Transport Strategy
- ensure that the pedestrian environment is accessible to disabled people

#### Extract from London Plan Policy 3C.21

##### Improving conditions for cycling

UDP policies should:

- ensure that routes are segregated from pedestrians as far as practicable but are not isolated

#### SPG Implementation Point 26: Walking and cycling

*Boroughs are encouraged to identify a series of key pedestrian and cycle routes connecting major land uses, and to conduct audits to assess whether these routes meet the principles of inclusive design. Where appropriate and related to strategic development, the Mayor will seek contributions to establish new pathways that meet the principles of inclusive design. Boroughs should encourage the use of pedestrian and cycle routes, by providing information and clear signs at appropriate heights, and which can be readily understood.*

- 3.17.1 There are an increasing number of initiatives to promote walking and cycling in London. Access audits are currently being conducted for a number of routes. An audit of the Thames Path National Trail has already been completed by the Countryside Agency.
- 3.17.2 Unfortunately, the access needs of disabled people are too often ignored, excluding many people from the health and other benefits of walking and cycling. It is important that cycling does not inadvertently create access or safety issues for disabled people. Cycling on footpaths is of great concern to blind, deafblind and partially sighted pedestrians.



- 3.17.3 Transport for London in February 2004 published 'The Walking Plan for London'<sup>54</sup> which includes objectives for making London a walkable city and identifies actions to promote improved access for disabled people.
- 3.17.4 Boroughs are encouraged to undertake pedestrian audits, looking at such places as town centres, canal and riverside walks, and transport interchanges, and to implement improvements which meet the access needs of disabled pedestrians (see paragraph 3.12 on access action plans and public realm strategies). The Mayor particularly encourages boroughs to identify a series of pedestrian and cycle routes linking schools, colleges and nurseries with public transport, homes and local amenities. Where appropriate and related to strategic development, the Mayor will seek contributions to establish pedestrian and cycle routes, where safety and accessibility have absolute priority. Children and young people identified improved facilities for walking and cycling as a priority for change in consultation on the draft Children and Young People's Strategy.

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*Further information on walking and cycling*

Details on the design of pedestrian and cycle routes, and how to ensure safe segregation between cyclists and pedestrians, can be found in the government's 'Inclusive Mobility'<sup>7</sup> guidelines published in October 2002.

The Joint Committee on the Mobility of Blind and Partially Sighted People have produced a policy statement on walking strategies and on shared use paths for pedestrians and cyclists [www.rnib.org.uk](http://www.rnib.org.uk).

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### 3.18 Parking

#### **Extract from London Plan Policy 3C.22: Parking Strategy**

The Mayor, in conjunction with boroughs, will seek to ensure that on-site car parking at new developments is the minimum necessary and that there is no over-provision that could undermine the use of more sustainable non-car modes. The only exception to this approach will be to ensure that developments are accessible for disabled people.

UDP policies and transport Local Implementation Plans should:

- recognise the needs of disabled people and provide adequate parking for them
- encourage good standards of car parking design.

**Extract from Annex 4 of the London Plan**

35 Policy 3C.22 recognises that developments should always include provision for car parking/car based access for disabled people. Despite improvements to public transport, some disabled people still require the use of private cars. Suitable designated car parking and/or drop-offs are therefore required.

36 Boroughs should take a flexible approach, but developments should have at least one accessible car parking bay designated for use by disabled people, even if no general parking is provided. All developments with associated car parking should have at least two parking bays for use by disabled people. The appropriate number of bays will depend on the size and nature of the development and boroughs should take into account local issues and estimates of local demand in setting appropriate standards. Where no off-street parking is proposed, applicants must demonstrate where disabled drivers can park in order to easily use the development.

**Extract from Table A4.2:**

The needs of disabled residents will need to be taken into account in developments with low car parking provision, so that adequate spaces, either on site or convenient dedicated on-street spaces, are identified for occupants.

**SPG Implementation Point 27: Parking Design**

*In the case of non-residential development, the Mayor will and boroughs should encourage the location of parking bays for use by Blue Badge Holders adjacent to or within easy reach of the main entrance, and sized in accordance with BS 8300 2001.*

*For residential development, the Mayor will and boroughs should seek to ensure that the design of parking bays are in accordance with the Lifetime Homes standards<sup>8</sup>. Parking bays associated with Wheelchair Housing should be designed in accordance with the Wheelchair Housing Design Guide.<sup>9</sup>*

*Any proposal to create car-free developments should demonstrate where Blue Badge Holders can park in order to easily use the development.*

- 3.18.1 The London Plan promotes the use of public transport and sustainable development. In locations with high public transport accessibility levels this could extend to car-free developments. However, despite the need to make improvements to public transport in London, the Mayor recognises that some disabled people still require the use of a private car. To ensure that car-free or car-reduction proposals do not discriminate against disabled people, applicants must demonstrate in their Access Statement

how the needs of disabled drivers have been addressed. Parking for disabled people should be provided to ensure that car-free developments are accessible for all. Adequate spaces, either on-site or at convenient dedicated on-street spaces, should be identified for residents, visitors and employees who are Blue Badge holders. Parking and drop off facilities should also be integrated into public transport developments.

- 3.18.2 Annex 4 of the London Plan sets out maximum car parking standards for employment, residential, retail and leisure uses. It provides guidance on parking in large mixed-use developments and advice on the provision of parking for disabled people.
- 3.18.3 The Mayor is currently undertaking further research to ascertain whether the standards recommended by the government in Transport Advisory Leaflet 5/95<sup>55</sup> are still relevant today, or whether new guidance for London should be provided to ensure that adequate provision is made for parking for disabled people.
- 3.18.4 Following the London Assembly's Transport Committee report 'Access Denied? Parking in Central London for people with mobility problems'<sup>56</sup> the four central London boroughs where the Blue Badge Scheme does not apply have agreed to harmonise their four different parking permit systems to make it easier and less confusing for blue badge holders to park in central London. The central London schemes are, however, to remain due to the unique parking and traffic conditions in central London. The Government has been considering measures to crack down on the illegal use of blue badge bays and announced in March 2004 an amendment to the Traffic Management Bill. In the amendment police and parking enforcement officers would have new powers to inspect blue badges to ensure that people taking advantage of the badge are entitled to do so. Further details can be seen on the Department for Transport website [www.mobility-unit.dft.gov.uk](http://www.mobility-unit.dft.gov.uk).

### 3.19 London's diverse population

#### London Plan Policy 3A.14

##### Addressing the needs of London's diverse population

UDP policies should identify the needs of the diverse groups in their area. They should address the spatial needs of these groups, and ensure that they are not disadvantaged both through general policies for development and specific policies relating to the provision of social infrastructure (policy 3A.15), the public realm, inclusive design and local distinctiveness (policies 4B.4, 4B.5 and 4B.7). Existing facilities that meet the needs of particular groups should be protected and where shortfalls have been identified, policies should seek measures to address them proactively.

#### SPG Implementation Point 28: London's diverse population

*The Mayor will and boroughs should endeavour to ensure that in meeting the principles of inclusive design the spatial needs of London's diverse communities are also addressed.*

- 3.19.1 When undertaking access audits, drafting access action plans and implementing access improvements to ensure disabled people, older people, children and their carers have easy, dignified and equal access to buildings, places and spaces, issues of race, culture and faith should also be addressed. For example the provision of single sex facilities and prayer rooms. The Mayor is preparing Supplementary Planning Guidance on meeting the spatial needs of London's diverse population.

### 3.20 Implementation and Monitoring

- 3.20.1 Section 6 of the London Plan deals with implementing the London Plan, delivering the vision and monitoring and review of the plan. The London Plan policies in Section 6 explain how the Mayor will work with strategic partners, the boroughs and with stakeholders, including the voluntary and community sectors to implement the plan. It is crucial to the delivery of an accessible and inclusive environment in London that policies on access and inclusion and proposals which meet the principles of inclusive design are monitored to ensure that they are effectively implemented.
- 3.20.2 As stated in section 2.7 of this SPG, the Mayor will and boroughs should involve disabled people in the planning system. Local access groups and organisations of disabled people can be a useful source of information on whether access provision has been implemented in accordance with agreed plans and proposals. The Mayor will investigate ways to help boroughs monitor this area of work.

## Appendices

### Appendix 1 - SPG Implementation Points

#### **SPG Implementation Point 1: The principles of inclusive design**

*The Mayor has adopted “the social model of disability” (see paragraph 1.1.2) and the principles of inclusive design underpin his approach to planning. To achieve an accessible and inclusive environment consistently across London the Mayor recommends that the boroughs adopt this approach.*

#### **SPG Implementation Point 2: DPTAC principles**

*The Mayor will and boroughs should seek to support the work of the DPTAC Built Environment Group by adopting the following principles and incorporating them into the planning process in London.*

- *Accessibility for disabled people is a condition of any investment.*
- *Accessibility for disabled people must be a mainstream activity.*
- *Disabled people should be involved in determining accessibility.*
- *Accessibility for disabled people is the responsibility of the provider.*

#### **SPG Implementation Point 3:**

##### **Integrating access needs 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.*

#### **SPG Implementation Point 4: Pre-application discussions**

*Boroughs should encourage pre-application discussions with applicants, and consider amending planning application forms to make applicants think proactively about inclusive design early in the design process.*

#### **SPG Implementation Point 5: Access Statements**

*Access Statements submitted with a planning application should identify the applicant’s approach to inclusive design, the key issues of the scheme, and the sources of advice and guidance used.*

#### **SPG Implementation Point 6: Access expertise**

*The Mayor will and boroughs should recommend applicants to appoint an appropriate access consultant for all major projects.*

*The Mayor has and boroughs should endeavour to appoint an access officer, but as a minimum, each authority should be able to call on appropriate professional advice whenever necessary - either through*

*information and resource sharing with other local authorities, or by the appointment of appropriate access consultants. This will ensure that the principles of inclusive design are fully understood and incorporated into development proposals.*

### **SPG Implementation Point 7: Local access groups**

*Boroughs should endeavour to set out in their Statements of Community Involvement how disabled people will be involved in the planning system.*

*The Mayor holds monthly meetings with the London Access Forum and boroughs should endeavour to support and service regular meetings with their local access group, to ensure that the benefits of direct community involvement and the expertise of people with personal experience of impairment are used to the best effect.*

### **SPG Implementation Point 8: Planning conditions and Section 106 Agreements**

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

### **SPG Implementation Point 9: Achieving the highest standards of inclusion**

*The Mayor will and boroughs should encourage applicants to exceed the minimum standards of reasonable provision for disabled people and aim to achieve the highest standards of safe, easy and inclusive access for all people, regardless of disability, age or gender.*

### **SPG Implementation Point 10: Inclusive access policies**

*UPDs should include appropriate inclusive access policies at all levels and not rely on a single access policy.*

*If a development proposal does not meet the highest standards of accessibility and inclusion for all people, regardless of disability, age or gender, bearing in mind other policy considerations, boroughs should consider refusing planning permission on the grounds that the scheme does not comply with the Unitary Development Plan.*

### **SPG Implementation Point 11: Employment**

*The Mayor will and boroughs should ensure that development proposals (including extensions, alterations and changes of use) for any building that is used for employment purposes adopt and integrate the principles of inclusive design. This should include access to, into and within the building*

*and its facilities, as well as appropriate car parking and access to public transport provision. The overarching London Plan Policy 4B.5 'Creating an inclusive environment' applies to all employment developments.*

### **SPG Implementation Point 12: Lifetime Homes**

*The Mayor will and boroughs should seek to ensure that all residential units in new housing developments are designed to Lifetime Home standards. These standards should be applied to all new housing, including conversions and refurbishments, and including blocks of flats, for both social housing and private sector housing, and should cater for a varying number of occupants.*

### **SPG Implementation Point 13: Wheelchair Housing**

*In all housing developments, including conversions and changes of use, the Mayor will and boroughs should seek to ensure that 10 per cent of the units are designed to be wheelchair accessible\*, or easily adaptable for residents who are wheelchair users. This percentage should be applied to both market and affordable housing, should be evenly distributed throughout the development, and cater for a varying number of occupants.*

*\*Note: If a borough wishes to vary this percentage, it should demonstrate to the Mayor that it has carried out a comprehensive recent assessment of need which demonstrates that a different proportion would be appropriate. The Mayor recommends that all London boroughs adopt the National Wheelchair Housing Association Group (NATWHAG) Wheelchair Housing Design Guide by Stephen Thorpe, published by the BRE in 1997<sup>9</sup>.*

### **SPG Implementation Point 14: Public Buildings**

*The Mayor will and boroughs should ensure that proposals for all public buildings, including shops, restaurants, community buildings, health, education, culture and the arts, and leisure including tourist, sport, play and youth facilities provide a high standard of inclusive access. The overarching London Plan Policy 4B.5: 'Creating an inclusive environment' applies to all public buildings.*

### **SPG Implementation Point 15: Health**

*The Mayor will and boroughs should endeavour to work with the Health Authority, National Health Service trusts and primary health care trusts to secure the provision of good quality health facilities that are well located and accessible to all users. The overarching London Plan Policy 4B.5 'Creating an inclusive environment' applies to all health buildings.*



**SPG Implementation Point 16: Access to Education**

*Proposals for educational facilities should aim to achieve the highest standards of safe, easy and inclusive access for all people regardless of disability, age or gender. The overarching London Plan Policy 4B.5 'Creating an inclusive environment' applies to all education buildings.*

**SPG Implementation Point 17: Shopping**

*In line with London Plan Policy 4B.5 'Creating an inclusive environment' UDP policies should ensure that all retail proposals meet the highest standards of accessibility and inclusion and that all new shop fronts are designed to provide inclusive access.*

*Boroughs should seek to improve the accessibility of town centres by reviewing facilities and implementing improvement schemes. Boroughs should seek to undertake access audits in conjunction with local access groups, and prepare and implement Access Action Plans.*

*The Mayor would like to see an increase in the number of Shopmobility schemes in London, and recommends that boroughs undertake an assessment of the feasibility of introducing these schemes in their areas.*

**SPG Implementation Point 18: Public Toilet Facilities**

*To address the shortage of accessible public toilet facilities in London, the Mayor will and boroughs should seek to ensure that proposals for retail, leisure, cultural, sport and community facilities provide suitable public toilets for all the community. Boroughs should also make an assessment of provision in public areas and give consideration to addressing any shortfalls.*

**SPG Implementation Point 19: Culture and the arts**

*The overarching policy 4B.5 'Creating an Inclusive Environment' applies to all development relating to cultural, sport, leisure and play facilities. The Mayor will and boroughs should ensure that these types of development meet the highest standards of accessibility and inclusion, and that disabled people are given the opportunity to participate equally in these mainstream activities. If in exceptional circumstances the principles of inclusive design cannot be fully met in an existing building this should be set out in the Access Statement submitted with the planning application and suitable alternative proposals to overcome the barriers explained.*

**SPG Implementation Point 20: Tourist Facilities**

*To address the shortage of accessible hotel accommodation in London, the Mayor will and boroughs should require that all proposals for hotels meet the highest standards of accessibility and inclusion. The overarching*

*London Plan Policy 4B.5 'Creating an inclusive environment' applies to hotels and other tourist facilities.*

### **SPG Implementation Point 21: Access Action Plans**

*The Mayor recommends that boroughs produce Access Action Plans to identify projects and proposals to improve the external environment and the public realm, including parks and open spaces to make them fully accessible to disabled people.*

### **SPG Implementation Point 22: Access to the countryside**

*Boroughs should seek to assess how accessible public rights-of-way are to disabled people and introduce strategies and enhancement schemes, in conjunction with local access groups and local organisations of disabled people, to ensure that everyone has equal access to the facilities available.*

### **SPG Implementation Point 23: Inclusive access to and within the historic environment**

*The overarching London Plan Policy 4B.5 'Creating an inclusive environment' applies to the historic environment. Boroughs should endeavour to make this clear to applicants and refer them to the Implementation Points in this SPG. In exceptional cases where inclusive design principles cannot be fully met the reasons should be justified in the accompanying Access Statement.*

### **SPG Implementation Point 24: Borough Transport Local Implementation Plans**

*The London Plan policies on inclusive transport are consistent with the policies set out in the Mayor's Transport Strategy. UDP policies should be in general conformity with the London Plan and where appropriate the Mayor's Transport Strategy. Boroughs Local Implementation Plans (LIPs) should reflect the inclusive transport policies in the Mayor's Transport Strategy and as far as practical LIPs should be consistent with borough UDPs.*

### **SPG Implementation Point 25: Public transport infrastructure**

*The Mayor will and boroughs should encourage applicants in any development that effects existing or provides new public transport facilities to exceed the minimum standards of reasonable provision for disabled people and aim to achieve the highest standards of safe, easy and inclusive access for all people, regardless of disability, age or gender. It will also be important to ensure that the various transport modes are integrated in a fully inclusive way.*

**SPG Implementation Point 26: Walking and cycling**

*Boroughs are encouraged to identify a series of key pedestrian and cycle routes connecting major land uses, and to conduct audits to assess whether these routes meet the principles of inclusive design. Where appropriate and related to strategic development, the Mayor will seek contributions to establish new pathways that meet the principles of inclusive design. Boroughs should encourage the use of pedestrian and cycle routes, by providing information and clear signs at appropriate heights, and which can be readily understood.*

**SPG Implementation Point 27: Parking Design**

*In the case of non-residential development, the Mayor will and boroughs should encourage the location of parking bays for use by Blue Badge Holders adjacent to or within easy reach of the main entrance, and sized in accordance with BS 8300 2001.*

*For residential development, the Mayor will and boroughs should seek to ensure that the design of parking bays are in accordance with the Lifetime Homes standards<sup>8</sup>. Parking bays associated with Wheelchair Housing should be designed in accordance with the Wheelchair Housing Design Guide.<sup>9</sup>*

*Any proposal to create car-free developments should demonstrate where Blue Badge Holders can park in order to easily use the development.*

**SPG Implementation Point 28: London's diverse population**

*The Mayor will and boroughs should endeavour to ensure that in meeting the principles of inclusive design the spatial needs of London's diverse communities are also addressed.*

## Appendix 2 - Legislation

### Town and Country Planning Act 1990

Section 76 of the Town and Country Planning Act 1990 requires that local planning authorities draw the attention of developers, when granting planning permission, to the relevant provisions of the Chronically Sick and Disabled Persons Act 1970, to British Standard 5810:1979 Code of Practice on Access for Disabled People and to Design Note 18 on access to educational buildings (both have now been superseded - see paragraph 2.9). The government has interpreted Section 76 of the Act in various circulars and policy guidance notes (see pages 56-59).

The Planning and Compulsory Purchase Bill has given the government an opportunity to review Section 76 of the Town and Country Planning Act 1990. The Disability Rights Commission has suggested a number of amendments to the bill which are currently being considered (see paragraph 2.1).

### The Building Regulations 2000

The requirements of the Approved Document M, 2004 edition 'Access to and use of buildings' are met by making reasonable provision to ensure that buildings are accessible and useable. People, regardless of disability, age or gender, should be able to:

- gain access to buildings and to gain access within buildings and use their facilities, both as visitors and as people who live or work in them.
- use sanitary conveniences in the principal storey of a new dwelling.

The requirements apply to new non-domestic buildings and to existing non-domestic buildings being extended or undergoing a material alteration or change of use. The Approved Document gives guidance for non-domestic buildings on approach, car parking and setting down, entrances, doors, corridors, lifts and stairs, toilets, showers and changing rooms, switches and controls, communication aids, seating in auditoria, and many other elements of a building. The 1999 edition included for the first time provisions to enable disabled occupants to cope better with reducing mobility and to 'stay put' longer in their own homes, and included provisions (unchanged in the 2004 edition) on approach, corridors, lifts and stairs, switches and sockets, and toilets. The provisions, however, do not necessarily facilitate full independent living for all disabled people.

The government announced in March 2004 a review, with the aim of strengthening the regulations by introducing the Lifetime Home standards,

recognising that better quality housing designed to adapt to changing household needs could benefit parents of young children through to frail, older people and disabled people allowing people to remain in their own homes for longer as they age or their circumstances change. The review is likely to take two years and will include consideration of whether the Lifetime Home standards are in need of updating.

Although the Building Regulations have made a huge impact on the accessibility of new buildings, and will now have a similar impact on existing buildings being altered, adoption of the guidance may not ensure fully integrated access which a disabled person can use in the same way as a non-disabled person. The way the building elements are integrated and the attention given to detail can have a significant impact on how easy a building is to use and how disabled people experience the spaces. For example it is common to see a building entrance with a wide grand staircase leading to a revolving door and a minimum width ramp to one side hidden by a substantial retaining wall leading to a swing door, effectively separating users of the ramp and creating an inferior segregated entrance.

### **Disability Discrimination Act 1995**

The Disability Discrimination Act 1995 was introduced to end the discrimination which disabled people face. It is being introduced in phases. Since December 1996 it has been unlawful for service providers to treat disabled people less favourably for reasons relating to their impairment i.e. to discriminate against disabled people. Since October 1999 service providers have had to make reasonable adjustments for disabled people, such as providing extra help or making changes to the way they provide their services.

On 1 October 2004 the final stage of the goods, facilities and services provisions of Part III of the Act come into force. The new duties will apply to businesses and to other providers of services to the public where physical features make access to their services impossible or unreasonably difficult for disabled people. The Disability Rights Commission published a revised Code of Practice on rights of access to goods, facilities, services and premises for disabled people in February 2002. The code provides detailed advice on the way the law should work, and gives practical examples and tips. Its status means it must be referred to for guidance in court when deciding on DDA 1995 Part III cases. It is important that service providers start preparing now for these new duties. Changes to physical features may be much more straightforward if built into planned refurbishment or changes to premises.

## Planning Policy Guidance

### PPG1 General Policies and Principles (February 1997)

#### *Paragraphs 33 and 34:*

‘Proposals for the development of land provide the opportunity to secure a more accessible environment for everyone, including wheelchair users, other people with disabilities, elderly people and those with young children. Local planning authorities, both in development plans and in determining individual planning applications, should take into account access issues. These will include access to and into buildings, and the need for accessible housing...’

‘When a new building is proposed, or when planning permission is required for the alteration or change of use of an existing building, the developer and local planning authority should consider the needs of people with disabilities at an early stage in the design process. They should be flexible and imaginative in seeking solutions, taking account of the particular circumstances of each case. Resolving problems by negotiation will always be preferable, but where appropriate the planning authority may impose conditions requiring access provision for disabled people...’

### Draft Planning Policy Statement 1: Creating Sustainable Communities Consultation Paper (February 2004)

Draft PPS 1 sets out the Government’s vision for planning and the key policies and principles, which should underpin the planning system (see paragraph 2.1.2).

### PPG 3 Housing (March 2000)

#### *First objective*

‘Local planning authorities should plan to meet the housing requirements of the whole community including those in need of affordable and special needs housing.’

#### *Paragraph 10:*

‘The government believes that it is important to help create mixed and inclusive communities, which offer a choice of housing and lifestyle.’

#### *Paragraph 13:*

‘Local planning authorities should work jointly with housing departments to assess the range of needs for different types and sizes of housing across all tenures in their area. This should include affordable housing and housing to help meet the needs of specific groups - the elderly, the disabled, students and young single people, rough sleepers, the homeless and those who need hostel accommodation, key workers, travellers and

occupiers of mobile homes and houseboats. Local assessments should consider not only the need for new housing but ways in which the existing stock might be better utilised to meet the needs of the community.'

### **PPG 6 Town Centres and Retail Development (June 1996)**

*Paragraph 2.28 outlines 3 key issues including:*

'to meet the access and mobility needs of disabled people'

#### *Paragraph 4.8*

'For new retail developments, local authorities should seek to ensure that the development is easily and safely accessible for pedestrians, cyclists and disabled people from the surrounding area.'

Annex B, C and E deal with traffic management strategies and policies for town centres, and town centre management strategies all of which should include improvements to meet the needs of disabled and older people and those with young children.

#### *Paragraph 3*

'Disabled and elderly people, as well as shoppers with prams, pushchairs or cycles, need good access to shops and other facilities. Local authorities should carry out a survey of the access and mobility needs of people coming to the town centre and ensure that:

- public transport stops are conveniently located, free from obstructions
- level access is provided to shops
- parking facilities are reserved for disabled people
- covered areas are provided close to shops and transport routes
- the provision of seating, good pavement design and surfacing materials, dropped kerbs or raised pedestrian crossings and other pedestrian priority measures.'

#### *Paragraph 5:*

Local authorities should also consider introducing a "Shopmobility" scheme.

### **Draft PPS6 Planning for Town Centres (December 2003)**

One of the key messages of the new draft PPS6 is 'the need to tackle social exclusion by ensuring access for all to a wide range of everyday goods and services.'

#### *Paragraph 2.14*

'Local planning authorities should work in conjunction with business and other interested parties to: develop local strategies for ensuring equality of access to local facilities.'



**PPG12 Development Plans (December 1999)**

*Paragraph 4.13 deals with social progress which recognises the needs of everyone.*

‘Local planning authorities, in preparing development plans, should consider the relationship of planning policies and proposals to social needs and problems, including their likely impact on different groups in the population, such as ethnic minorities, religious groups, elderly and disabled people, women, single parent families, students, and disadvantaged people living in deprived areas. They should also consider the extent to which they can address issues of social exclusion through land use planning policies.’

**PPG13 Transport (March 2001)**

*Paragraph 19*

‘A key planning objective is to ensure that jobs, shopping, leisure facilities and services are accessible by public transport, walking, and cycling. This is important for all, but especially for those who do not have regular use of a car, and to promote social inclusion.’

*Paragraph 31:*

‘The government wants to promote public transport that is accessible to disabled people and a pedestrian environment that enables them to make use of it. However, for some disabled people there is no substitute for the private car. Local authorities, developers and transport providers should work together to seek to meet the accessibility needs of disabled people in all developments by:

- taking account of their needs, in terms of access arrangements and parking spaces, in location and parking policies. In particular, policies to reduce the level of parking must ensure that there are adequate numbers of suitably designed parking spaces for disabled people;
- giving attention to the needs of disabled people in the design, layout, physical conditions and inter-relationship of uses. In particular, ensuring that town centres and residential areas have well defined and safe access arrangements for disabled motorists, disabled public transport users and disabled pedestrians, including those who are blind or partially sighted; and
- ensuring developments, including transport infrastructure, are accessible to and usable by disabled people – as motorists, public transport users and pedestrians – through decisions on location, design and layout.’

### *Paragraph 51*

In developing and implementing policies on parking, local authorities should:

- ‘Require developers to provide designated parking spaces for disabled people in accordance with current good practice.’

### *Paragraph 82*

‘Where clearly justified and in accordance with the usual statutory and policy tests, conditions may legitimately be used to require on-site transport measures and facilities as part of development or to prohibit development on the application site until an event occurs, including:

- specifying the number of parking spaces, and their size, including those for disabled people;
- the management and use of parking spaces, so that, for example, priority is given to certain categories of people, e.g. disabled people, people with children, visitors, or cars with more than one occupant;
- the provision of information to staff and visitors about public transport, walking and cycling access to the site, including information for disabled people.’

## **PPG 15 Planning and the historic environment (1994)**

### *Paragraph 3.28*

‘It is important in principle that disabled people should have dignified easy access to and within historic buildings. If it is treated as part of an integrated review of access requirements for all visitors or users, and a flexible and pragmatic approach is taken, it should normally be possible to plan suitable access for disabled people without compromising a building’s special interest. Alternative routes or re-organizing the use of spaces may achieve the desired result without the need for damaging alterations.’

## **PPG17 Planning for Open Space, Sport and Recreation**

### *Paragraph 18*

‘... In looking to improve existing open space and facilities, local authorities should encourage better accessibility of existing open spaces and sports and recreational facilities, taking account of the mobility needs in the local population.’

### *Paragraph 20*

‘In identifying where to locate new areas of open space, sports and recreational facilities, local authorities should promote accessibility by walking, cycling and public transport, and ensure that facilities are accessible for people with disabilities.’

### Appendix 3 - List of access groups and access officers in London

<b>Borough</b>	<b>Access Group</b>	<b>Access Officer</b>
Barking & Dagenham	Access Group of Barking & Dagenham	Full time in Building Control
Barnet	Access in Barnet (Disability Action in the Borough of Barnet)	Full time in Social Services
Bexley	Bexley Access Group	Part time in Planning
Brent	Brent Access Group	Use external consultant
Bromley	Bromley Association of People with Disabilities	Full time in Building Control
Camden	Camden Access Panel (Disability in Camden (DISC))	Full time in Building Control
City of London	City of London Access Group  Community	Full time access officer plus two assistants in  Services Department
Croydon	Croydon Equal Access Group	Full time in Planning
Ealing	Ealing Access Committee	Part time in Planning Policy
Enfield	Enfield Disablement Association	No
Greenwich	Greenwich Association of Disabled People	Full time in Strategic Planning
Hackney	Hackney Access Project	No
Hammersmith & Fulham	Hammersmith and Fulham Action on Disability (HAFAD)	Full time in Environment Department
Haringey	No	No
Harrow	Harrow Mayor's Access Committee	Part time in Environmental Services
Havering	Havering Access & Advisory Group (HAAG)	Full time in Community Services
Hillingdon	Hillingdon Access Group (Disablement Association of Hillingdon (DASH))	No
Hounslow	Disability Network Hounslow	Part time in Planning
Islington	Islington Access Group	Full time in Planning
Kensington & Chelsea	Action Disability Kensington & Chelsea	Full time in Planning
Kingston	Kingston Centre for Independent Living	Part time in Building Control
Lambeth	No	No
Lewisham	Lewisham Disability Coalition	Part time in Planning
Merton	Access for Independence in Merton (AIM)	No
Newham	Newham Access & Disability Group (Action & Rights of Disabled People in Newham)	No

<b>Borough</b>	<b>Access Group</b>	<b>Access Officer</b>
Redbridge	Redbridge Access & Mobility Projects (RAMPS)	Full time in Building Control
Richmond	No	No
Southwark	Access Group for Southwark	No
Sutton	Sutton Access Committee (SCILL)	No
Tower Hamlets	Tower Hamlets Access Group (Tower Hamlets Coalition of Disabled People)	Part time in Community Partnership
Waltham Forest	Waltham Forest Access Alliance	Full time in Building Consultancy
Wandsworth	Wandsworth Access Association	No
Westminster	Westminster Action on Disability (WAND)	Yes (3 year full time contract in Corporate Services)

Alan Francis, co-ordinator of the London Access Forum can give contact details of local access groups; [alan.francis@radar.org.uk](mailto:alan.francis@radar.org.uk).

John Davison, secretary to the London Region of the Access Association can give contact details of London Access Officers; [access@london.com](mailto:access@london.com).

#### Appendix 4 - Lifetime Homes Criteria (correct at March 2004)

	<b>Lifetime Homes Standards</b>	<b>Comment</b>
1	Where there is car parking adjacent to the home, it should be capable of enlargement to attain a 3300mm width.	This refers to in-curtilage parking. If the scheme meets Part M of the Building Regulations then this standard is met.
2	The distance from the car parking space to the home should be kept to a minimum and should be level or gently sloping.	If the scheme meets Part M then this standard is met.
3	The approach to all entrances should be level or gently sloping.	If the scheme meets Part M then this standard is met.
4	All entrances should be illuminated, have level access over the threshold and have a covered main entrance.	This standard goes beyond Part M because it applies to ALL entrances. Additional requirements include providing lighting and a cover over the main entrance.
5	Communal stairs should provide easy access, and where homes are reached by a lift, the lift should be wheelchair accessible.	This standard goes beyond Part M because it requires a lift which will hold eight people, not six.
6	The width of internal doorways and hallways should conform to Part M, except where the approach is not head on and the corridor width is 900mm, where the clear opening width should be 900mm rather than 800mm. There should be 300mm to the side of the leading edge of the doors on the entrance level.	This standard goes beyond Part M because of the requirement for 300mm to the leading edge of ground floor doors to facilitate opening for wheelchair users, and for 900mm clear opening for doorways coming off a 900mm wide corridor.
7	There should be space for turning a wheelchair in dining areas and living rooms and adequate circulation space for wheelchair users elsewhere.	The dimension for a turning circle is 1500mm; an ellipse of 1400x1700mm is also acceptable.
8	The living room should be at entrance level.	In some town houses this is often shown as living/bedroom.

	<b>Lifetime Homes Standards</b>	<b>Comment</b>
9	In houses of two or more storeys, there should be space on the ground floor that could be used as a convenient bed space.	The bed-space could be a temporary measure. But there should be enough space to make one without compromising the living room.
10	There should be a wheelchair accessible entrance level toilet with drainage provision enabling a shower to be fitted in the future.	For properties 2 bed and below a Part M toilet is acceptable, for 3 bed and larger then the wheelchair user should be able to close the door and do a side transfer onto the toilet. Minimum requirement is 1100mm in front of the WC pan.
11	Walls in bathrooms and toilets should be capable of taking adaptations such as handrails.	Walls should be reinforced.
12	The design should incorporate provision for a future stair-lift and a suitably identified space for potential installation of a through the floor lift from the ground to the first floor, for example to a bedroom next to a bathroom.	There should be a clear space between the wall and the widest part of the opposite handrail of at least 900mm wide. The identified space for the through the floor lift will have butted joists.
13	The design should provide for a reasonable route for a potential hoist from a main bedroom to the bathroom.	The best solution is a removable panel between the bathroom and bedroom, however a simple route from bed to bathroom is acceptable so long as the potential route does not compromise fire walls/breaks.
14	The bathroom should be designed to incorporate ease of access to the bath, WC and wash basin.	While there is not a requirement for a turning circle, simple layout and ease of use are essential.
15	Living room window glazing should begin at 800mm or lower, and windows should be easy to open/operate.	Below 800mm, standard glazing is not acceptable under Building Regulations.
16	Switches sockets, ventilation and service controls should be at a height useable by all (i.e. between 450mm and 1200mm from the floor).	This standard goes beyond Part M because of the requirement for all service controls etc. on all floors to meet the standard.

## Appendix 5 - Wheelchair Housing Standards

The following key features of wheelchair housing are requirements in the Wheelchair Housing Design Guide by Stephen Thorpe, commissioned and funded by NATWHAG, the National Wheelchair Housing Association Group and published in 1997 by BRE Bookshop, ISBN 1 86081 164 7 available from <http://www.brebookshop.com/details.jsp?id=33004>. Habinteg Housing Association is currently reviewing these standards.

### Approach

- Level or gently sloping route to all external entrances, and to external facilities such as storage, parking, garden and clothes drying area.
- Paths slip resistant and smooth, minimum width 1200mm.
- Ramps to be avoided.
- Path gateways to provide minimum 850mm clear opening width.
- Good cover at point of transfer from vehicle to wheelchair.

### Parking

- Located adjacent to the front entrance.
- Under cover.
- 3.6 metres wide.
- Located beside a 900mm wide path connecting the front door, parking bay and the adjacent road.

### Entrance

- Entrance to be covered and well lit.
- Entrance landing to be level, and min 1500 x 1500mm.
- All external doors to give 800mm clear opening and to have accessible thresholds.

### Internal circulation

- Corridors minimum 900mm wide, 1200mm wide where 90° turn necessary and 1500mm wide where 180° turn necessary.
- Internal doorways to give minimum 775mm clear opening width and to have level thresholds.
- Provision for storage and recharging of battery-operated wheelchair.
- Minimum turning space inside entrance 1200 x 1500mm.
- Rooms all on one level or accessible by wheelchair accessible lift. Where lift required, to comply with BS5900 (1991).
- Bedrooms, living rooms and dining rooms with adequate space for wheelchair users to turn through 180° with furniture in place i.e. turning circle 1500mm or ellipse 1800mm x 1400mm.
- Main bedroom to bathroom connected by full height knockout panel, or other means.

- Suitable provision for future hoist to run between main bedroom and bathroom.
- Kitchen layout provides effective and appropriate space for use by a wheelchair user. Clear manoeuvring area minimum 1800 x 1400mm.
- Bathroom layout ensures independent approach/transfer to and use of all fittings, including manoeuvring space clear of fittings.
- Extra space in bathroom for both bath and shower with at least one to be fully installed. Shower area to be wheelchair accessible with floor drain.
- Suitable controls of mains water stopcock, gas and electric main consumer units. Suitable isolating valves to sink, washing machine, etc.
- Glazing line in living/dining/bedrooms no higher than 810mm above room floor level.



## Appendix 6 - Glossary

**Access** 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 services and information. For disabled people, access in London is the freedom to participate in the economy, in how London is planned, in the social and cultural life of the community.

**Access action plans** 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** a statement which accompanies a planning application which demonstrates how the principles of inclusive design, including the specific needs of disabled people, have been integrated into the proposed development and how inclusion will be maintained and managed.

**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

in all aspects of life and the removal of the barriers of discrimination and oppression experienced by certain groups.

**Housing Corporation** a public body, which reports to government and whose role is to fund and regulate Registered Social Landlords in England.

**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 have 16 design features that ensure that the home will be flexible enough to meet the existing and changing needs of most households, as set out in the Joseph Rowntree Foundation report 'Meeting Part M and Designing Lifetime Homes'.

**London Development Agency** one of the GLA group organisations that acts on behalf of the GLA whose aim is to further the economic development and regeneration of London.

**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 on persons with an interest in land in order to achieve the implementation of relevant planning policies as authorised by Section 106 of the Town and Country Planning Act 1990.

**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 GLA rejects the medical model of disability and accepts:

- that disability is a social phenomenon
- that while many individuals have physical or sensory impairments or learning difficulties or are living with mental health needs, it is the way society responds to these that creates disability and not the impairment
- that disablism is a form of oppression in the same way as is, for example, racism, sexism and homophobia.

**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.

**Unitary Development Plans** statutory plans produced by each borough which integrate strategic and local planning responsibilities through policies and proposals for the development and use of land in their area.

**Wheelchair housing** homes built to meet the standards set out in the National Wheelchair Housing Group report Wheelchair Housing Design Guide 1997.

## Appendix 7 - Abbreviations

CAE	Centre for Accessible Environments
DDA	Disability Discrimination Act 1995
DfES	Department for Education and Skills
DfT	Department for Transport
DPTAC	Disabled Person's Transport Advisory Committee
DRC	Disability Rights Commission
DTLR	Department of Transport, Local Government and the Regions
ETC	English Tourism Council
GLAD	Greater London Action on Disability
HoDis	National Disability Housing Service
LDA	London Development Agency
LEAs	Local Education Authorities
NAS	National Accessible Standard
NATWHAG	National Wheelchair Housing Association Group
NHS	National Health Service
ODPM	Office of the Deputy Prime Minister
PPG	Planning Policy Guidance
PPS	Planning Policy Statement
RADAR	Royal Association of Disability and Rehabilitation
RTPI	Royal Town Planning Institute
SAI	Schools Access Initiative
SENDA	Special Educational Needs and Disability Act 2001
SPG	Supplementary Planning Guidance

## Appendix 8 - List of useful organisations and websites

Access Association	<a href="http://www.accessassociation.co.uk">www.accessassociation.co.uk</a>
Accessible Tourism	<a href="http://www.accessibletourism.org.uk">www.accessibletourism.org.uk</a>
Arts Council England	<a href="http://www.artscouncil.org.uk">www.artscouncil.org.uk</a>
Centre for Accessible Environments (CAE)	<a href="http://www.cae.org.uk">www.cae.org.uk</a>
Department for Education and Skills	<a href="http://www.DfES.gov.uk">www.DfES.gov.uk</a>
Department for Transport Mobility and Inclusion Unit	<a href="http://www.mobility-unit.dft.gov.uk">www.mobility-unit.dft.gov.uk</a>
Disability Rights Commission	<a href="http://www.drc-gb.org.uk">www.drc-gb.org.uk</a>
Disabled Person's Transport Advisory Committee	<a href="http://www.dptac.gov.uk">www.dptac.gov.uk</a>
English Tourism Council	<a href="http://www.englishtourism.org.uk">www.englishtourism.org.uk</a>
GLAD (Greater London Action on Disability)	<a href="http://www.glad.org.uk">www.glad.org.uk</a>
Greater London Authority (GLA)	<a href="http://www.london.gov.uk">www.london.gov.uk</a>
HoDiS (National Disability Housing Service)	<a href="http://www.hodis.org.uk">www.hodis.org.uk</a>
London Development Agency	<a href="http://www.lda.gov.uk">www.lda.gov.uk</a>
National Health Service	<a href="http://www.nhs.gov.uk">www.nhs.gov.uk</a>
National Register of Access Consultants (NRAC)	<a href="http://www.nrac.org.uk">www.nrac.org.uk</a>
Office of the Deputy Prime Minister	<a href="http://www.odpm.gov.uk">www.odpm.gov.uk</a>
RADAR (Royal Association of Disability and Rehabilitation)	<a href="http://www.radar.org.uk">www.radar.org.uk</a>
RNIB (Royal National Institute for Blind People)	<a href="http://www.rnib.org.uk">www.rnib.org.uk</a>
RNID (Royal National Institute for Deaf and Hard of Hearing People)	<a href="http://www.rnid.org.uk">www.rnid.org.uk</a>

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### Hindi

यदि आप इस दस्तावेज़ की प्रति अपनी भाषा में चाहते हैं,  
तो कृपया निम्नलिखित नम्बर पर फोन करें अथवा दिये  
गये पता पर सम्पर्क करें।

### Vietnamese

Tiếng Việt  
Nếu bạn muốn bản sao của tài liệu này bằng  
ngôn ngữ của bạn, hãy gọi điện theo số hoặc  
liên lạc với địa chỉ dưới đây.

### Bengali

আপনি যদি আপনার ভাষায় এই দলিলের প্রতিলিপি  
(কপি) চান, তা হলে নীচের ফোন নম্বরে  
বা ঠিকানায় অনুগ্রহ করে যোগাযোগ করুন।

### Greek

Αν θα θέλατε ένα αντίγραφο του  
παρόντος εγγράφου στη γλώσσα  
σας, παρακαλώ να τηλεφωνήσετε  
στον αριθμό ή να επικοινωνήσετε  
στην παρακάτω διεύθυνση.

### Urdu

اگر آپ اس دستاویز کی نقل اپنی زبان میں چاہتے  
ہیں، تو براہ کرم نیچے دیئے گئے نمبر پر فون کریں  
یا دیئے گئے پتے پر رابطہ قائم کریں۔

### Turkish

Bize telefon ederek ya da yukarıdaki  
adrese başvurarak bu belgenin  
Türkçe'sini isteyebilirsiniz.

### Arabic

إذا أردت نسخة من هذه الوثيقة بلغتك، الرجاء  
الاتصال برقم الهاتف أو الكتابة الى العنوان

### Punjabi

ਜੇ ਤੁਹਾਨੂੰ ਇਸ ਦਸਤਾਵੇਜ਼ ਦੀ ਕਾਪੀ ਤੁਹਾਡੀ ਆਪਣੀ ਭਾਸ਼ਾ  
ਵਿਚ ਚਾਹੀਦੀ ਹੈ, ਤਾਂ ਹੇਠ ਲਿਖੇ ਨੰਬਰ 'ਤੇ ਫੋਨ ਕਰੋ ਜਾਂ ਹੇਠ  
ਲਿਖੇ ਪਤੇ 'ਤੇ ਰਾਬਤਾ ਕਰੋ:

### Gujarati

જો તમને આ દસ્તાવેજની નકલ તમારી ભાષામાં  
જોઈતી હોય તો, કૃપા કરી આપેલ નંબર ઉપર  
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