

CONSULTATION STATEMENT - Accessible Hillingdon SPD

In connection with the preparation of the Accessible Hillingdon Supplementary Planning Document, a Consultation Statement is required to demonstrate with whom the Council consulted and how they engaged with local people and other interested parties during the preparation stages of the SPD.

The statement contains the following information:

- i) a summary of the organisations with whom the Council consulted;
- ii) how those organisations were consulted;
- iii) a summary of the issues raised; and
- iv) how those issues have been addressed in the SPD.

A consultation on the draft Accessible Hillingdon – Revised Draft Supplementary Planning Document (SPD) (January 2013) took place between 18th February and 28th March 2013.

The following consultees were sent either a printed copy or a letter containing a link to the Council’s website. Comments were invited on the SPD:

Statutory and Other Organisations listed in the Council’s Statement of Community Involvement	168
Disability Organisations (including the Access Association)	42
Tenants and Residents associations	14
Access & Mobility Forum	33

In addition to being published on the Council’s website (see notice overleaf), the draft SPD was distributed to all Borough libraries, to the Hayes One-Stop Shop and Planning Reception. A summary of the proposed changes to the SPD was presented to the Council’s Residents Planning Forum in January and a presentation was given to the Access & Mobility Forum on 11th March 2013, where representatives of the Council’s Access Forum and Disablement Association Hillingdon (DASH) were present.

In addition to the external consultation process, the draft SPD was also circulated to relevant internal Council staff inviting comments relating to their particular areas of expertise.

A total of 12 responses were received of which 4 requested amendments/additions to the SPD as detailed overleaf.

SUMMARY OF THE MAIN ISSUES RAISED:

Summary of representation/issue	Officer response
Anonymous	
<p>“I consider the whole project unnecessary and a squandering of public money. The building of which would cause great inconvenience and distress to many families (Forget it).”</p>	<p>Given that no specific details are provided in the comments, there is no scope for amending the SPD. <u>No changes proposed</u></p>
Borough Planning, Transport for London	
<p>SPD does not appear to contain references to the current London Plan Housing Supplementary Guidance (Housing SPG November 2012). This should be referenced.</p>	<p><u>Reference to GLA Housing SPG (November 2012) inserted under Sources & References on page 119.</u></p>
<p>Accessible Parking (Lifetime Home Standards) – Add to SPD: “If bays are perpendicular to the access aisle, an additional width of at least 1200mm along each side should be provided”. This is to ensure that the SPD is consistent with Department for Transport ‘Inclusive Mobility’ guidance.</p>	<p>Inclusive Mobility does not specify technical standards related to Lifetime Home Standards or Accessible Housing. Lifetime Home Standards require scope to provide an additional 900mm to the side of a parking space. <u>No changes proposed.</u></p>
<p>Accessible Parking (Lifetime Home Standards) – Add to SPD: “Parking areas should be designed to enable vehicle to enter and exit site in forward gear”. “This is to minimise conflicts between vehicles and other road users, in particular for people with disability/reduced mobility”.</p>	<p>Not applicable to individual dwellings. Parking schemes related to communal developments would require a Parking Management Plan which would address how vehicles enter and exit. <u>No changes proposed.</u></p>
<p>Streetscape – Pavements, footways and other pedestrian routes must:</p> <ul style="list-style-type: none"> • be at least 2000mm wide (unobstructed) (to be consistent with DfT Manual for Streets). • Remove “in less busy areas be at least 1500mm in width” (this is contrary to guidance from Manual for Streets). 	<p><u>Reference to footway width, page 60, increased from 1800mm to 2000mm.</u></p> <p>“Inclusive Mobility” provides more detailed guidance than “Manual for Streets”. It states “... 2000mm allows two wheelchairs to pass one another comfortably. ...should be regarded as the minimum... Where ... not possible ...1500mm could be regarded as the minimum... The absolute minimum, where there is an obstacle, should be 1000mm clear space”.</p>

Summary of representation/issue	Officer response
<ul style="list-style-type: none"> • Add “In exceptional circumstances, a minimum width of 1 metre for pedestrians between obstacles should only be used for a distance of up to 6 metres” (to be consistent with DfT Manual for Streets). • “Provide a head height of at least 2600mm from the pavement to any overhead protrusion” (to be consistent with DfT Manual for Streets). 	<p>British Standard 8300:2009 refers to a minimum footway width of 1800mm (2000mm preferred). 1500mm on less busy routes (where passing places are provided) and 1200mm on the approach to existing developments. <u>No change proposed.</u></p> <p>In terms of footway width, BS8300:2009 is considered to be more up-to-date than Inclusive Mobility. Therefore, a minimum footway width of 1500 mm has been retained on page 60. <u>No change proposed.</u></p> <p><u>SPD amended on page 60.</u></p>
Anonymous	
<p>The new SPD is far improved and welcomed. A reduction in photographs over the last document makes it less inspiring. The document should convey the importance of accessibility in context to everyday situations and this can only be done using photographs.</p> <p>The Lifetime Home Standards section is missing some technical drawings which makes it inconsistent with the rest of the document.</p> <p>SPD does not reference in the ‘introduction’ all relevant London Plan policies as listed at the back of the document. Introduction should be updated to highlight Hillingdon Local Plan, UDP Saved Policies, etc.</p> <p>Otherwise a well presented, informative document.</p>	<p><u>Photos added on pages 38, 94</u></p> <p><u>New diagram (Lifetime Home Bedroom) inserted on page 23.</u></p> <p><u>Introduction revised on page 5.</u></p> <p>Comment welcomed. <u>No changes required</u></p>
Greater London Authority, Principal Adviser - Access and Inclusion	

Summary of representation/issue	Officer response
<p>The SPD appears comprehensive and should prove to be a useful tool for both planners and prospective developers. However the SPD raises a number of issues outlined below:</p> <ul style="list-style-type: none"> • It would be helpful if reference to inclusive design in the National Planning Policy Framework could be made in the section at the beginning of the document rather than in the appendix. • It would be helpful to refer to the latest version of Part M of the Building Regulations which was updated in January this year. • The full reference for the latest version of British Standard BS 8300 is BS 8300:2009+A1:2010 (it includes advice on Changing Places WCs). • Reference to Sport England's guide on access for disabled people should refer to their latest guide Accessible Sports Facilities Design Guide which was published in 2010. • The Government, as part of its red tape challenge, is currently reviewing and aiming to rationalise the large number of codes, standards, rules, regulations and guidance related to housing standards. The accessibility working group is due to report its findings to the housing review group at the end of April and as the group has been considering the Lifetime home and wheelchair housing standards and Hillingdon Council may wish to wait for the conclusion of this review before proceeding with publication of their SPD. • It may be helpful to provide more detail about the types of planning applications that are required to include a Design and Access Statement. 	<p>Comment welcomed. <u>No changes required</u></p> <p><u>Reference inserted on page 7.</u></p> <p><u>Reference amended on page 6 & 118.</u></p> <p><u>Reference amended on page 6, 83 & 119.</u></p> <p><u>Reference amended on page 101 & 118.</u></p> <p>Given the ongoing changes to policies and guidance at the national and London-wide level, it is not considered appropriate to delay the adoption of the SPD. <u>No changes proposed.</u></p> <p><u>Link inserted on page 101 to further information available on the Council's website.</u></p>

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<ul style="list-style-type: none"> • No mention is made in the hotels section (page 96) of London Plan policy 4.5 to encourage applicants to submit an Accessibility Management Plan. Information available in draft SPG on Town Centres. • No mention is made in the section on housing for older people of the HAPPI report recommendations (Housing our Aging Population Panel for Innovation). It would be helpful to signpost readers to HAPPI reports to encourage the following HAPPI design principles: <ul style="list-style-type: none"> i. generous internal space standards ii. plenty of natural light in the home and in circulation spaces iii. balconies and outdoor space, avoiding internal corridors and single-aspect flats iv. adaptability and 'care aware' design which is ready for emerging telecare and telehealthcare technologies v. circulation spaces that encourage interaction and avoid an 'institutional feel' vi. shared facilities and community 'hubs' where these are lacking in the neighbourhood vii. plants, trees, and the natural environment viii. high levels of energy efficiency, with good ventilation to avoid overheating ix. extra storage for belongings and bicycles x. shared external areas such as 'home zones' that give priority to pedestrians 	<p><u>Hotels, Motels and Student Accommodation section updated on page 96.</u></p> <p><u>Design principles and reference included on page 58</u></p>
Civil Aviation Authority, Aerodrome and Air Traffic Standards Division	
Other than the consultation required by Section 110 of the Localism Act 2011, it is not necessary to contact the CAA about Strategic Planning Documents.	<u>No changes required</u>
Disablement Association Hillingdon (DASH)	
I will try to have a look at this document.	No actual comments on the document received. <u>No changes required</u>

Summary of representation/issue	Officer response
London Borough of Harrow, Local Plans Team	
Harrow Council has no observations to make as a neighbouring local planning authority.	<u>No changes required</u>
Highways Agency	
The Highways Authority have reviewed the consultation and do not have any comment at this time.	<u>No changes required</u>
Environment Agency	
Having reviewed the document we have no comments to make.	<u>No changes required</u>
Canal & River Trust London	
I don't have any comments to make.	<u>No changes required</u>
Network Rail	
The Accessible Hillingdon draft SPD sets out the Council's principles and standards for designing housing and places which are accessible to older and disabled people. We would recommend that the Council give consideration to ensuring accessibility at railway stations within the Council's borough, and that CIL or S106 developer contributions could be used to provide funding for enhancements at railway stations, e.g. step free access, better facilities.	<p>The comment relates to providing specific guidance for railway stations within the SPD. The SPD is intended to provide generic guidance which can be applied to developments across the board.</p> <p><u>No changes proposed.</u></p>
Natural England	
Natural England does not consider that this Supplementary Planning Document poses any likely or significant risk to those features of the natural environment for which NE would otherwise provide a more detailed consultation response and so does not wish to make specific comment on the details of this consultation.	<u>No changes required</u>