

Comments received October 2008

SPD reference	Comment	Source	Response
General	<p>The status of Supplementary Planning Documents is not explained.</p> <p>It would be useful to readers of the SPD, once it is adopted, for there to be a brief explanation of the role and function of SPDs.</p>	LMU	<p>Section 2. Planning Policy sets out the UDP policies that underpin and justify this SPD.</p> <p>A footnote has been added, providing a reference to PPS12: Local Spatial Planning which describes the legal status of an SPD.</p>
General	<p>The purpose of the document is not stated anywhere within the document.</p> <p>The purpose seems to be set out in the accompanying draft Sustainability Appraisal – which would probably not be read by the majority of people who would be reading the SPD once it has been adopted – which states :-</p> <p>The overall objective for the Accessible Housing SPD is:</p> <p><i>“To provide developers, members</i></p>	LMU	<p>Section1. Introduction describes the purpose of the document; the first sentence reads “This Supplementary Planning Document* sets out the Council’s standards for accessible housing. The authority to set appropriate design standards at a local level is established by certain retained policies within Islington’s UDP (See Section 2 below). The standards build upon those that define Lifetime Homes, they reflect policy development at a national level towards a contemporary British Standard for accessible housing, respond to local conditions, and contribute to the delivery of more inclusive communities”.</p>

	<p><i>of the community and other stakeholders with clear guidance of what will be required to include in a Design and Access statement to satisfy the ambition for the council to meet its requirements for housing to be Lifetime Homes compliant and fully wheelchair accessible for permanent users.“</i></p>		
Section 4	<p>By requiring “that 10% of all new residential development is fully wheelchair accessible”, the Council is creating new policy.</p> <p>This document should therefore be treated as a Development Plan Document (DPD), and should therefore be subject to the full rigour of independent examination.</p> <p>The requirement in the London Plan is merely for 10% of new housing to be designed to be wheelchair accessible, “or easily adaptable for residents who are wheelchair users” (our emphasis).</p>	LMU	<p>LBI operates the London Plan policy and the guidance reflects it. The description of the policy will be amended to clarify the fact that, unless a sale or allocation to a wheelchair user is confirmed, new dwellings designed to wheelchair accessible housing standards need not be fully fitted.</p> <p>“Stipulation on the design of housing suitable for permanent and sustainable occupation by a wheelchair user (10% of all new housing) is drawn from Habinteg Housing Association’s guide and allows for the fact that not every unit will immediately or continuously be occupied by a wheelchair user and that in any event individual needs and domestic”</p>

5.2 Travel distances	This seems to be creating new policy	LMU	The guidance is based upon experience of:
5.3 Approach	As a result, the document should be treated as a DPD and should be subject to the full rigour of an independent examination.		Car free housing schemes
5.4 Entrances			Local disabled people living within higher density, single common entry point residential developments in the borough (raised through a comprehensive programme of engagement)
5.5 Common parts	In any event, this requirement is too restrictive.		Research and advice published by the DfT's mobility and inclusion unit.
5.6 Circulation			Negotiations with developers on the basis of a very similar interim guidance note.
5.7 Room sizes			In any event the stipulation is that distances 'should' be limited, not that they 'must'. There will always be room for consideration on a site by site basis.
5.8 Accommodation at entrance level			Re the repeated claim that the development of LBI's guidance on the application of LTH principle constitutes a change in policy and is in any event too restrictive.
			The GLA's access and inclusion manager on the London Plan team said: "The SPD complies with the London Plan policy - it goes further in that it suggests more standards beyond the 16 LTH standards but I have made comment on the basis that if they are going beyond they might want to go even

			<p>further!!</p> <p>“We welcome the additional facilities suggested on top of the LTH standards - this goes beyond the London Plan policy but helps to promote more inclusive communities.</p> <p>The GLA went on to comment:</p> <p>Section 3 Lifetime Homes - it might be helpful to provide further explanation that Islington are proposing some additional standards that go beyond the 16 LTH standards.</p> <p>The LTH name is like a kite mark promoted by Habinteg Housing Association and used by CLG in the code for sustainable homes (see technical guide pages 220 - 226 http://www.planningportal.gov.uk/uploads/code_for_sustainable_homes_techguide.pdf) so it could be confusing if Islington change the standards and still call them Lifetime Homes.</p> <p>It should be clear that a LTH is a home that meets the 16 standards. The standards outlined in section 5 go beyond these 16 criteria - which is fine and which I support.</p> <p>The LTH standards, stipulated by the Code for Sustainable Homes are now included and identified at the head of each section.</p>
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	<p>This may well result a reduced amount of purpose-built or purpose-adapted residential accommodation being provided for students in the borough.</p>		<p>Section 3 includes the statement “The Lifetime Homes Standards stipulated by the Code for Sustainable Homes head each of the criteria described in Section 5 of this draft SPD. This makes clear the enhancements introduced by Islington in response to the contemporary urban brief.”</p> <p>We do not understand the suggestion that the SPD if adopted might reduce the amount of residential accommodation built for students in the borough.</p> <p>In any event the conventional ‘hall of residence’/ hostel type accommodation would not be expected to meet accessible housing standards but rather conform to B.Reggs requirements for 1:20 rooms to be fully accessible.</p>
Section 4	<p>The 10% wheelchair accessible housing requirement should be calculated as a simple percentage of the total number of dwellings proposed in any residential scheme were this policy applies.</p>	Optic realm Ltd	<p>The London Plan does ask for 10% of new units to be wheelchair accessible. In Islington, on the basis of our negotiating experience over the last 2 years, we think it fairer for all concerned if we ask for the quota to be calculated against habitable rooms. This enables the Council to obtain more 2 and 3 bed units, and avoid the 1 bed flats for which there is little or no demand, without disadvantaging the developer.</p>
Section 5	<p>Varying standards on wheelchair housing and lifetime homes from one local planning authority to</p>	Optic realm Ltd	<p>Further to the GLA’s note of support for the initiative taken but advice that we clarify where and to what extent Islington’s guidance goes beyond that adopted at a</p>

	<p>another is something that in principle should be avoided.</p> <p>Where standards are proposed at odds with either the Greater London Authority Supplementary Planning Guidance “Accessible London – Achieving an Inclusive Environment” and/or the national Lifetime Homes criteria, a clear and reasoned justification for the same should be provided, and the Council should re-consult on the same</p>		<p>national level:</p> <p>Section 3 provides a clear and reasoned justification for the establishment of Islington’s flexible homes design standards, which go beyond the LTH standards stipulated by the Code for Sustainable Homes, reflect policy development at a national level towards a contemporary British Standard for accessible housing, respond to local conditions, and contribute to the delivery of more inclusive communities</p> <p>By way of clarification the originating CfSH LTH standard is printed at the head of each section</p>
General	No comment	Natural England	
General	<p>Accessibility and design polices in the SPD should consider issues relating to the conversion/ refurbishment of heritage assets for housing. For example:</p> <p>Appropriate or sensitive alteration should have due regard for what makes a particular building</p>	English Heritage	<p>These are all useful suggestions but would be more sensibly incorporated into the next edition of the Urban Design Guide and or a further SPD on the principles and practice or Inclusive Design.</p> <p>The Access Officers do work closely with colleagues in Design and conservation and are in fact hosting a conference on the Inclusive Design within an historic</p>

	<p>special or significant.</p> <p>All successful design solutions depend on allowing time for a thorough site analysis and careful character appraisal of the context. In most cases access can be improved without compromising historic buildings. The key lies in the process of information gathering about the building, understanding its significance and vulnerabilities and knowledge about the needs of people with disabilities.</p> <p>The importance of preparing access plans, and working through the issues it raises is fundamental to the process of determining the need for changes to a historic building.</p> <p>For historic buildings the Design and Access statements should make clear how the approach to access has balanced the duties imposed by the DDA (where the proposal is subject to those</p>		<p>environment for January 2009.</p>
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	<p>duties) and the particular historical and architectural significance of the building.</p> <p>Further guidance can be found at www.helm.org.uk. In particular I would like to draw your attention to English Heritage and CABE guidance on <i>Building in Context</i> available at http://www.helm.org.uk/server/show/nav.7709 and <i>Easy Access to Historic Buildings</i> available at http://www.helm.org.uk/server/show/nav.19634.</p>		
Section 4	The main reference should be to Habinteg's 'Wheelchair housing design guide', as the guide sets out best practice.	Circle Anglia	That is the reference and it is clearly noted in Section 1.1
Section 6	We object to the requirements set out in item 6.0.3 requiring wheelchair units above the ground floor. This affects smaller schemes in an adverse way.	Circle Anglia	Where wheelchair accessible dwellings are located above or below ground level they should <u>usually</u> be served by more than one lift. Where a high-spec maintenance/repair contract is offered as an alternative <u>it will be considered</u> but there will be a general

	<p>Provision of 2 lifts in smaller schemes will result in a disproportionately high capital cost and for social housing schemes results in unduly high service charges for tenants.</p> <p>6.0.4: It is infeasible to expect a through the floor lift on dwellings in excess of 2 storeys.</p> <p>6.0.10: The requirement for such utility controls to be accessible to a wheelchair user should be specified.</p> <p>6.0.12: The requirement for the sink and hob to be adjustable should be set out. Also it is worth stipulating that white goods or fixed worktops should be located at the end of kitchen worktop run.</p>		<p>presumption against any dependence upon management commitments. Residents consulted have experienced the consequences of such contracts, where the engineer has honoured the call-out commitment but is unable to fix the fault for want of a spare part that will take days to obtain.</p> <p>The wording has been changed to ‘vertical rise’ lift. However, our principle concern is that vertically organised living is unsustainable – and so should normally be discouraged.</p> <p>The wording has been amended but in truth the design of the controls goes well beyond the realm of LPA influence.</p> <p>Our position is that should a wheelchair user buy or be allocated to one of these units the kitchen and bathroom would be installed in accordance with their wishes. Otherwise, as will often be the case, a non-disabled person will take up residence initially in which case standard fittings would suffice. As a planning authority our jurisdiction is purely spatial.</p>
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	<p>6.0.13: It should be noted that the requirement for dining facilities to be provided within the kitchen is not always feasible particularly in larger family homes.</p> <p>6.0.15: We would recommend referring to the requirement for showers rather than baths. Showers are usually provided in meeting affordable housing grant funded wheelchair homes, and environmentally showers are preferable.</p> <p>6.0.21: Reference should be made to WC's having an outward opening door.</p>		<p>It is a clear priority set out in the Habinteg guide that kitchens provide easy access to dining areas. Wording in the draft SPD has been amended to provide to incorporate that degree of flexibility.</p> <p>In spatial terms it is better that we specify for a bath, which could in any event be replaced by a shower.</p> <p>The wording has been amended.</p>
<p>General LTH</p>	<p>In our experience developers and architects are perplexed by the variations to the Lifetime Homes</p>	<p>DBA and Land Securities</p>	<p>The first paragraph in the draft SPD states: "This Supplementary Planning Document* sets out the Council's standards for accessible housing. The</p>

	<p>standards in different London boroughs; what's considered accessible in one borough is not in another.</p> <p>The Code for Sustainable Homes version of the Lifetime Homes standards (Technical Guide October 2008) is nationally recognised and is already mandatory for Code Level 6. We would welcome local policy simply making reference to the Lifetime Homes standards in the latest version of the Code for Sustainable Homes. Any local additional requirements for</p> <p>Regular housing should be described in the SPD, but should NOT come under the heading of Lifetime Homes standards in our opinion.</p>		<p>authority to set appropriate design standards at a local level is established by certain retained policies within Islington's UDP (See Section 2 below). The standards build upon those that define Lifetime Homes, they reflect policy development at a national level towards a contemporary British Standard for accessible housing, respond to local conditions, and contribute to the delivery of more inclusive communities.”</p> <p>Section 3 includes the statement “The Lifetime Homes Standards stipulated by the Code for Sustainable Homes head each of the criteria described in Section 5 of this draft SPD. This makes clear the enhancements introduced by Islington in response to the contemporary urban brief.”</p>
General	The Wheelchair Housing	DBA and	The standards listed are all drawn from the Habinteg

<p>wheelchair accessible housing</p>	<p>standards listed in the SPD are quite different to those in then Wheelchair Housing Design Guide (referred to by the London Plan).</p> <p>Why not make reference to the Mayor of London's Best Practice Guidance on Wheelchair Accessible Housing, 2007?</p>	<p>Land Securities</p>	<p>design guide (references now included), with the exception of the wheelchair storage and charging area. That discrepancy has now been corrected.</p> <p>The Mayor's Best Practice Guide is included as a reference.</p> <p>The purpose of this SPD is to set out the very basic spatial requirements that must be secured at the planning stage. There are numerous more detailed, more informative and nuanced guides available.</p> <p>Applicants are directed to some of them on pp 18 of the SPD</p>
<p>5.1 Parking</p>	<p>Guidance on charging and storage points for mobility scooters would be welcomed, but this and any other options should not be part of the Lifetime Homes standards.</p>	<p>DBA and Land Securities</p>	<p>It is now clearly set out in the draft SPD what the Code for Sustainable Homes stipulates and what additional measures LBI will require.</p> <p>The suggestion re scooter storage and charging facilities emerged through discussion of the Council's car free development policies and views expressed by local disabled people, for whom public transport remains largely inaccessible but among whom scooter use is increasingly popular.</p> <p>It is now clear that the requirement is additional to that stipulated by the Code for Sustainable Homes.</p>

			DD226 states: 'Code for sustainable homes' describes storage requirements eg for cycles. These should take account of the mobility requirement of their possible users and the possibility of storage/charging facilities for mobility scooters should be considered.
Travel distances	Item 5.2.1 contradicts the guidance in section 6.0.5, which covers parking for wheelchair accessible housing.	DBA and Land Securities	<p>This is not true. Both state that the overall distance between a parking bay and the dwelling should be no greater than 75m.</p> <p>In the case of flexible homes an additional measure of 50m between bay and main entrance of 50m is stipulated.</p> <p>DD26 states: The distance from accessible parking places to the main entrance of the development should be no more than 50m. If greater than 50m then resting points should be provided no more than 50m apart.</p> <p>The point being that overall travel distances should not be exceeded. But, it is common that wheelchair accessible dwellings have their own entrance but more often the case that general needs 'flexible homes' are reached via a common entrance point. It is often between that common entrance point and the individual dwelling entrance that unmanageable travel distances have been introduced.</p> <p>The DfT issues guidance on maximum travel distances without a rest; ranging from 50-150m for different mobility</p>

			<p>impairments. However, these do not refer to parking at home ie when one might be carrying luggage or loading the car.</p>
Common parts	<p>No further clarification or guidance is needed on the principle of treating common parts of any residential development as though they were public buildings. We do not believe that this idea has been thought through properly. The demands on circulation space in a public building are very different to those in a residential building. It is frustrating that Part M Section 9 covers vertical but not horizontal circulation, but imposing the public building regulations on residential projects is excessive.</p>	DBA and Land Securities	<p>It is an anomaly that no guidance exists at a national level for horizontal circulation within the common parts of residential developments.</p> <p>However, on balance, LBI considers the common parts of residential developments to be closer in their use and function to a public building than to an individual dwelling.</p> <p>We still receive applications that propose corridors in common parts at 900 or 1000mm wide.</p> <p>We therefore propose:</p> <p>The common entrance to any multi unit residential development should be treated in the same way as the entrance to a public building, in so far as it should:</p> <p>Be clearly identified</p> <p>Have at least one door that provides a clear opening width of at least 1000mm (unless powered in which case the combined opening width should be at least 1000mm);</p> <p>Have an opening weight no greater than 30N (where this cannot be achieved the door should be automated); and</p>

			<p>Be provided with an accessible entry phone.</p> <p>DD26 states: Common entrances should be capable of being operated manually or with power assistance in accordance with BS8300:2001 ie the opening weight should not exceed 20N. Where this is not achievable the door should be power assisted.</p> <p>The effective clear opening width of the common entrance should be 1000mm and there should be a 300mm manoeuvring- space beyond the leading edge, on the pull side, of the door (unless the door is power assisted).</p> <p>LBI also states:</p> <p>Corridors in common parts should be at least 1200mm wide, the number of doors along their length should be kept to a minimum and, where unavoidable, preferably held open. Those doors should provide a clear opening width of at least 800mm and where manually operated should have an opening weight not exceeding 30N.</p> <p>DD26 states: Corridors in the communal parts of the building should be at least 1200mm wide.</p>
	<p>Approved Document Part M and the CfSH Technical Guide cover almost all of the points made here, so why re-write them?</p>	<p>DBA and Land Securities</p>	<p>Entry phones etc are not covered by Part M for dwellings and will not be systematically checked by building control. That is why we have elected to treat the</p>

	<p>Concierge service and covered routes are additions</p> <p>that should be removed from the Lifetime Homes section of the SPD - we want clarity, not complexity!</p>		<p>common parts essentially as public buildings.</p> <p>The concierge station and service are live issues debated and agreed at the planning stage and make a real contribution to the successful management of common parts. The issue has come to light over recent years where schemes submitted are increasingly dense but with one single entry point. The demands for security and ready access are not easily balanced.</p>
<p>Lifts within common parts</p>	<p>There is no requirement to install lifts under the Lifetime Homes standards. Any requirement for lifts or 'concessions' to smaller developments must come under local policy instead, but care should be taken not to contradict the CfSH standards.</p>	<p>DBA and Land Securities</p>	<p>The failure to require that lifts be installed, or at least the capacity to fit them at a later date, defeats the object of the original LTH principle that we are trying to achieve in Islington; that of adaptability (and preferably visitability too)</p> <p>DD226 states:</p> <p>Where the development has 4 or more storeys (regardless of the number of dwellings served) a passenger lift (car size 1100x1400mm) should be installed in each core from the outset....A lift with internal car dimensions of 2000x1400mm would be more convenient for mobility scooter and bike users. Passenger lifts should be fitted with emergency communication systems. The layout and controls should conform to those set out in BS8300:2001.</p> <p>In a 3 storey development (regardless of the number of dwellings served) a passenger lift or enclosed platform</p>

			<p>lift (car size 1100x1400mm) should be installed from the outset.</p> <p>In a 2 storey development where the core serves 4 or more dwellings and enclosed platform lift (car size 1100x1400mm) should be provided from the outset.</p> <p>In a 2 storey development where the core serves less than 4 dwellings provision (spatial, structural and in terms of electrical and other services) should be made within the common parts of the scheme to install at some future date an enclosed platform lift (car size 1100x1400mm).</p> <p>Attention is drawn to the issue of mechanical breakdown and the advantage in those circumstances of a second/back up lift.</p> <p>Where a block contains a floor that gives access to car parking, or other communal facilities associated with that block, a passenger lift should be installed from the outset.</p>
Accommodation	Once again this section is a departure from the Lifetime Homes standards and may cause confusion. 5.8.2 talks about the combination of kitchen/diner being unpleasant, which surely depends on the design of such spaces?	DBA and Land Securities	It is the very fact of not being able to separate kitchen and living room to which our residents object. An L-shape configuration may overcome the problem but it is right to presume against the arrangement.

	<p>This is not an access issue.</p> <p>In duplex apartments the living room is often at an upper level for a variety of reasons. In these cases we point out that a bedroom at entrance level could be used as a reception room by the resident.</p> <p>We feel that Lifetime Homes standard 8 causes confusion by the requirement for 'the living room' to be at entrance level and could inhibit innovative housing design if taken at face value. The purpose of this standard is to ensure that visitors who cannot use stairs can access the home.</p> <p>Standards 8 and 9 would be met by a habitable room on the entrance level. This space would be suitable for a temporary bed, and could be used as a small bedroom, living room, playroom, study or storage space, as required by the resident of a</p>		<p>It is the LBI position that a living space should always be provided at entrance level, in the name of visitability. A bedroom does not provide an equivalent facility.</p> <p>Alternative arrangements would have to be justified and negotiated on a site by site basis, considered against all the circumstances of the case.</p>
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	town-house or duplex where the living space is above the bedrooms.		
5.10	In DBA's view a recessed basin can be in the side-transfer-zone next to the WC, avoiding the need for excessively large bathrooms in standard homes, while meeting the Lifetime Homes standards.\	DBA and Land Securities	Accepted.
5.12	It would be helpful if the space for unobstructed landings for a stairlift and the soft-pocket needed for the through-floor lift was defined.	DBA and Land Securities	Lift car size is stipulated now.
5.13	There is no requirement for a level access shower under Lifetime Homes standards and nor should there be. This is far too prescriptive for general needs	DBA and Land Securities	We permit a pumped solution above ground level and only the future installation to be thought through. The provision has not proved onerous for applicants working to a similar guidance note for the last 2 years and

	housing.		provides a valuable resource for future adaptability.
5.15	<p>This contradicts the Building Regulations Part K - balustrades to balconies and similar are required to be 1100mm high. This standard is particularly difficult to justify in tall buildings -</p> <p>800mm is too low for an opening window, - risk of falling etc.</p> <p>The reference to wheelchair users should be removed - there is too much confusion between the Lifetime Homes' standards and Wheelchair Housing standards.</p>	DBA and Land Securities	<p>Agreed – 800mm is too low for a balustrade in H&S terms – the issue here is one of visual obstruction.</p> <p>The wording has been amended to clarify the distinction.</p> <p>“Balustrades must of course be at least 1100mm high, to satisfy H&S requirements, but the location of solid elements, should take into account the sight lines facilitated from a seated position. The top rail might, for instance, be higher than the minimum 1100mm and the panel beneath transparent.”</p>
5.16	<p>The Lifetime homes standards do not mention accessibility of bins. This is local guidance and should be kept separate.</p>	DBA and Land Securities	<p>Direction on the location and accessibility of common utilities was raised as a key issue by the participants in our user engagement exercise and by residents of recently completed developments.</p>