

Camden Planning Guidance

Access for all

March 2019



CPG Access for all

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1. Introduction

What is Camden Planning Guidance?

- 1.1 The Council has prepared this Camden Planning Guidance (CPG) on Access for all to support the policies in the Camden Local Plan 2017. This guidance is therefore consistent with the Local Plan and forms a Supplementary Planning Document (SPD) which is an additional material consideration in planning decisions.
- 1.2 This document should be read in conjunction with, and within the context of, the relevant policies in Camden's Local Plan, other Local Plan documents and other Camden Planning Guidance documents.

What does this guidance cover?

- 1.3 This guidance provides information on Access within the borough and supports Local Plan Policy C6 – Access for all.
- 1.4 Other relevant policies in the Local Plan include:
 - Policy D1 Design
 - Policy D2 Heritage
 - Policy C1 Health and wellbeing
 - Policy H6 Housing choice and mix
 - Policy T1 Prioritising walking, cycling and public transport
 - Policy T2 Parking and car-free development
- 1.5 This document replaces the 'Access for all' section in CPG 6 Amenity (adopted 2011).

Key Messages:

- The Council expects all development of buildings and places, including changes of use and alterations or refurbishment of existing buildings, to be inclusively designed and useable by all to promote equality of opportunity.
- Well-designed, accessible buildings and spaces ensure that homes, jobs, local services and facilities as well as the public realm are accessible to everyone and increase equality of opportunity and social inclusion. The Council will seek to ensure the highest standards of access and inclusion in Camden's built environment and public realm.
- Access should be considered at the beginning of the design process. Design and Access Statements for new developments and spaces should contain an inclusive design statement, including the specific needs of disabled people, have been integrated into the proposed development.
- The Council will balance the requirement to provide access with the conservation of heritage assets.

2. Access for all in Camden

- 2.1 Camden Council is committed to ensuring that the built environment in the borough can be enjoyed by all. Everyone should be able to get to and use buildings and the spaces between them.
- 2.2 The Council will seek to promote inclusive design and remove the barriers that prevent people from accessing facilities and opportunities.
- 2.3 High-quality design recognises the diversity of its users and should seek to create an attractive, inclusive, open, and user-friendly environment.
- 2.4 A successfully accessible and inclusive environment is one that everyone can benefit from by being able to move freely, independently and uninhibited within and through regardless of their age, disability, ethnicity, gender, gender expression, faith, economic circumstances or whether they are travelling with children, or are carrying shopping or luggage. Inclusive design is fundamental to improving the quality of life for disabled and older people in particular.
- 2.5 Providing access for all makes good business sense by increasing the customer and talent base and by avoiding losing potential customers and employees who face barriers.
- 2.6 This guidance document seeks to encourage best practice and promote a high quality and inclusive environment for all. It provides general guidelines on accessibility and specific advice in relation to accessible buildings, listed buildings and heritage assets, accessible streets and places, public transport and parking, and design and access statements.
- 2.7 In accordance with Local Plan Policy C6 Access for All, this guidance applies to all development in Camden that may affect the accessibility of buildings, streets, places, public transport and parking. Applicants should provide information to demonstrate how the above policy has been met. The recommended form of providing this information is through an inclusive design statement.

3. Key aspects of ensuring Access for all

- 3.1 Access arrangements should be considered and addressed from the beginning of the design process as they are an integral aspect of building design. Overcoming access barriers at a later stage in the project can result in a building or space that is not inclusive and may be inaccessible to many people.
- 3.2 In accordance with Local Plan Policy A1 'Managing the impact of development', negative impacts of the construction phase should be minimised and mitigated to ensure continued and unhindered access for all occupiers, neighbours and the wider community.
- 3.3 Providing an accessible and inclusive environment for all can promote and encourage healthy lifestyles, social inclusion, good health and wellbeing, and help to reduce health inequalities and social isolation, by

ensuring that any potential barriers to accessing goods, services, employment, sport and social activities are minimised for all members of society. Local Plan Policy C1 requires development to contribute positively to creating high quality, active, safe and accessible places. For major developments, a Health Impact Assessment is required. Developers should consult the Camden Planning Guidance on Planning for health and wellbeing for further details.

- 3.4 The [Equality Act 2010](#) protects nine characteristics from discrimination: age, disability, gender reassignment, marriage or civil partnership (in employment only), pregnancy and maternity, race, religion or belief, sex and sexual orientation. Where a physical feature puts anyone at a substantial disadvantage by limiting their access to goods, facilities or services, developers must take reasonable steps to:
- remove the feature;
 - alter it so that it no longer has that effect;
 - provide a reasonable means of avoiding the feature; or
 - provide a reasonable alternative method of making the service available to disabled people.
- 3.5 Service providers should not wait for anyone affected to ask for access but should consider how to make the premises or service accessible before any such request.
- 3.6 Applicants are advised to consult the Council's Building Control service at an early stage in the formulation of development proposals to ensure conformity with the relevant requirements relating to access. Satisfying some of the requirements of Part M of the Building Regulations can affect the size and design of the building and needs to be taken into account at the early design stage. It should be noted that compliance with Approved Document M (AD M) does not ensure that the duties of the Equality Act 2010 have been met. AD M is the minimum level of access acceptable.

4. Guidelines for providing Access for all

- 4.1 The following table sets out guidelines which, if put together successfully, should create an inclusive and accessible environment. These should be considered in conjunction with the sections on accessible buildings, listed buildings and heritage assets, accessible streets and places, public transport and parking, and design and access statements below.

Guidelines	Features to be considered
1. Approach	• Level or adequately ramped • Sufficient width and obstacle free • Firm, durable, slip resistant surfaces • Well lit and clearly identified • Dropped kerbs with tactile surfaces • Contrasting colour on bollards and street furniture • Wayfinding strategy • Clearly displayed building name and number
Parking	• Suitably designed and marked spaces (please see below for guidance on parking) • Spaces as close as possible to all accessible entrances • Dropped kerbs onto a level obstruction free route to the accessible entrance • Appropriately located and signed dropping off point • Information about parking on website
2. Entrances	• One entrance door that is accessible to all. • Level or adequately ramped and stepped if necessary with appropriately designed handrails • Ramped gradients as shallow as possible • Level area in front of the door • Level threshold • Canopy over manual doors • Easy to open doors • Provision of electronic entrance doors • Sufficiently wide doors • Doors to have contrast.
Lobbies	• Need to be of a size and shape to allow a wheelchair user to move clear of one door before opening the second door • Floor surface that does not impede movement, avoid dips or changing surfaces, including mats • entrance matting to be sufficient to allow at least one whole wheel rotation of a wheelchair wheel and sufficient to not require loose matting in inclement weather
Receptions	• Provide hearing enhancement systems and lowered wheelchair accessible counters. • Should be easily identifiable • Provide unisex wheelchair accessible WC before security line • Reduce hard surfaces that cause noise reverberation.
3. Levels	• Provide a lifting device and suitable stairs to all storeys above and below ground – in new build this should be a full passenger lift • Ramps for internal changes within a storey • Any raised areas to be accessible to everyone
Circulation	• Adequately wide corridors • Sufficiently wide doors • Clear, well lit signs which include universally recognised pictograms • Colour contrast within the building • Corridors free of obstructions

4. Facilities
- Adequate provision of wheelchair accessible unisex toilets
 - Provision of an enlarged cubicle in separate sex toilets
 - Where shower and changing facilities are included provide wheelchair accessible facilities
 - Provision of wheelchair accessible hotel bedrooms and accessible student accommodation
 - Appropriately designed sockets and switches
 - Provide accessible wayfinding strategy
 - Provide good colour contrast
 - Provide suitable egress for all
 - Consider provision of a changing places facility
 - All shared amenities must be designed to be accessible to all

5. Accessible buildings

- 5.1 All new developments should be inclusively designed and incorporate a suitable level of access for everyone.
- 5.2 The design of changes of use, alterations and extensions to existing buildings and spaces should take the opportunity to improve access for all.
- 5.3 The planning system is not able to require the access to existing buildings or areas to be retrospectively improved where alterations are not being made. Applicants should however consider their duties under the Equality Act 2010, which apply to both new and existing buildings.
- 5.4 For developments involving housing, reference should also be made to Camden Local Plan Policy H6 Housing choice and mix and Camden Planning Guidance on Housing, the London Plan and Housing Supplementary Planning Guidance, as well as Approved Document M Volume 1 M4(2) and M4(3).
- 5.5 The accessibility needs differ across the population. Developers should be guided by the proposed end use and the end users in determining the right level of access. The Council will assess each development proposal on its own merits to determine a suitable level of accessible accommodation to be provided. On major applications, the inclusive design statement should detail engagement with relevant user groups such as disabled or older people's organisations.

6. Listed buildings and heritage assets

- 6.1 For listed buildings and other heritage assets, the Council will balance the requirement to provide access with the interests of conservation and preservation. Sensitive design solutions that achieve access for all, to and within listed buildings, should be sought. Local Plan Policy D2

Heritage sets out the Council's detailed approach to development affecting listed buildings and other heritage assets.

- 6.2 Measures to facilitate dignified and easy access to and within listed buildings can often be sensitively incorporated without damage to the buildings special architectural or historic interest. However, the Equality Act 2010 does not override other legislation such as listed building or planning legislation.
- 6.3 Listed Building Consent will be required in the vast majority of cases for works to improve access and in formulating proposals. Design and Access Statements are required for a listed building consent. Where a planning application is submitted in parallel with an application for listed building consent a single combined statement can be submitted which should address the requirements for both applications. Further details on what to include in Design and Access Statements can be found in Design and Access section below. Applicants are encouraged to undertake early discussions with the Council by contacting planning@camden.gov.uk.
- 6.4 Historic England has produced two documents, entitled Easy Access to Historic Buildings and Easy Access to Historic Landscapes, which provide further guidance on listed buildings and other heritage assets.

7. Accessible streets and places

- 7.1 The Council's ambition of Access for all includes the Borough's streets and places. In accordance with Local Plan Policy C1 Health and wellbeing, the Council will require developments to positively contribute to creating high-quality, active, safe, accessible and inclusive places. The design of new public spaces and renewal of existing streets and spaces should always consider how people orientate themselves and how they can find their way around and through. The Council will expect developers to ensure good quality access and circulation arrangements for all pedestrians, regardless of level of mobility, any sensory impairment, learning difficulties or dementia, including improvements to existing routes, surfaces and footways.
- 7.2 Particular attention should be given to seeking opportunities to improve the experience for vulnerable groups, including people suffering with dementia.
- 7.3 Local Plan Policies D1 Design, T1 Prioritising walking, cycling and public transport, and Camden Planning Guidance on Transport set out the Council's approach to providing attractive and accessible streets and spaces. The Camden [Streetscape Design Manual](#) has been prepared to raise the standard of street works consistently throughout the borough. It sets standards for the Council's own works and provides guidance for contractors, developers, public utilities and other private agencies.

- 7.4 Transport for London's [Streetscape Guidance](#) provides a standard for London's streets and spaces and should be consulted in relation to providing access for all.
- 7.5 Level access should be provided to the principal entrance in all developments, and is a requirement for all new dwellings. Any new works must not make access any worse than what previously existed, in line with AD M of the Building Regulations.
- 7.6 The design of routes around buildings should be clear and free from obstruction, especially to the entrance. Any obstructions should be made clear and avoidable, for example by changes in surface texture.
- 7.7 In the case of residential development, proposals must meet Camden Local Plan Policy H6 on Housing choice and mix.

8. Public transport and parking

- 8.1 In line with its sustainable development objectives, the Council encourages public transport and requires all new development in the borough to be car-free, as set out in Local Plan Policy T2 'Parking and car-free development'. The Council also recognises and promotes the health benefits associated with active travel, such as walking and cycling, in line with Policy T1 Prioritising walking, cycling and public transport and Policy C1 Health and wellbeing.
- 8.2 The Council does however recognise that that some disabled people rely on private car use as their main or only transport option. Planning applications will be required to demonstrate how the needs of disabled drivers have been addressed. The Council will support provision of disabled parking and drop-off facilities which are integrated with public transport facilities. Guidance on the provision of parking spaces for drivers with disabilities is contained in the Local Plan Policy T2 'Parking and car-free development' and in the Camden Planning Guidance on Transport - Chapter 7 Vehicle access. In addition, the London Plan sets out standards for parking spaces designated for disabled users for different types of development.

9. Public and 'Changing Places' toilets

- 9.1 Public toilets are particularly important for certain groups, such as the elderly, disabled, children and people suffering from bladder or bowel conditions. The lack of public toilets can discourage people from going out into the community and can act as a barrier to healthy lifestyles, social inclusion, good health and wellbeing, and can increase health inequalities and social isolation.
- 9.2 The Council will expect major schemes with large numbers of visitors to provide public toilets, as set out in Local Plan Policy C2, paragraph 4.42. Draft London Plan Policy S6 states that large-scale commercial developments that are open to the public, such as shops, leisure facilities and large areas of public realm, should provide and secure the future management of free, publicly accessible toilets. It further states

that these should be available during opening hours (or 24 hours in areas of public realm), and should be suitable for a range of users, including disabled people.

- 9.3 The Council will also continue to encourage businesses to allow the public to use their facilities through the [Community Toilet Scheme](#).
- 9.4 For people who cannot use standard accessible toilets, '[Changing places](#)' toilets have more space and the right equipment, such as a height-adjustable changing bench and a hoist. The Draft London Plan Policy S6 on public toilets states that larger developments where users are expected to spend long periods of time or where there is no other local provision, should provide 'Changing Places' toilets as identified in the British Standard BS8300.

10. Design and Access Statements

- 10.1 A Design and Access Statement is a concise written and illustrated report, which accompanies and supports a planning application and a Building Control application. It explains the thinking behind a design and its context in a proposal in a structured way.
- 10.2 In relation to Access for all, the following issues should be included when preparing the Design and Access Statements and inclusive design statement:
 - A brief explanation of the applicant's approach to access, with particular reference to the inclusion of disabled people;
 - Analysis of the site, its setting, and as a result of this assessment, formulated and applied design principles to achieve a good, inclusive design for buildings and public spaces;
 - Analysis of the specific needs of disabled people, by showing how they have been integrated into the proposed development, and how inclusion will be maintained and managed, detailed in an inclusive design statement;
 - A description of how the sources of advice on accessibility and technical issues have been, or will be, followed, including the design guidance standards that have been worked to;
 - Details of any consultations undertaken or planned, including the number of users, particular user need groups (for example, visually impaired, dementia sufferers, deaf or hard of hearing, ethnic groups, people with learning disabilities and mental health) and the degree to which the process has been influenced by it;
 - Details of any professional advice that has been followed, or will be sought, including recommendations from access consultants, access audits or appraisals;
 - An explanation of any specific issues affecting accessibility to, or within, the particular environment being considered, and/or service provision, employment or educational opportunities;

- Details of access solutions adopted to overcome any issues, including those which deviate from recognised good practice;
- Details of the management and maintenance practices adopted, or to be adopted, to maintain features enhancing accessibility including fire evacuation procedures (for example, lighting, colour and luminance contrast, door closing forces), specialist equipment (for example, induction loops, audible and visual fire alarm systems), and staff training; and
- A plan illustrating features such as routes in, out and around the outside of the building, vertical and horizontal circulation routes, positions of accessible car parking bays, the location of public transport, and any other features relevant to the proposal. This should include information on emergency egress for all users.

- 10.3 Where good practice cannot be met, the Design and Access Statement should state why this is the case, set out the implications for users, explain what solutions have been considered and explain what other measures are being taken to ensure access is provided to the facilities available.
- 10.4 Applicants should note that Design and Access Statements differ from the requirements for Access statements set out in AD M of the Building Regulations, which are only required when specific building control regulations cannot be met. AD M of the Building Regulations sets out the requirements to ensure access to and use of a building's facilities are accessible to all.
- 10.5 It may also be appropriate to combine the Design and Access Statement with other statements sought by the Camden Local Plan or other sections of Camden Planning Guidance, provided that the requirements of all such statements are adequately addressed.
- 10.6 Further guidance by the Design Council on Design and Access Statements can be found [here](#).