

H&F Local Plan Examination 2017

Housing: Respondent no: 23

Hammersmith and Fulham Disability Forum (Disability Forum)

This written statement should be read in conjunction with our original submission in October 2016.

HO5: Housing Mix and HO11: Detailed residential standards

Representations to the Proposed Submission Local Plan Regulation 19 Consultation (including Council responses)

In our original submission we recommended “planning approvals at Outline or FUL application stage include the correct footprint and building envelope to comply with detailed residential standards in Policy HO11”.

We do not support the response to our recommendation on **P 234: Comment 245**:. The council’s response was “ Comments noted. This will be dealt with as part of the validation of planning applications.” We are not sure this can be correct. We understand that validation is an administrative process not an application approval process.

Planning permission is usually granted on the assumption that the footprint or building envelope is sufficient to deliver the detailed residential standards at a later stage. Our experience with DET or RES applications at the later stage is that this assumption is not always well founded. The consequence is that the applicant may

- not be able to provide drawings compliant with M4(2) accessible and adaptable dwellings and M4(3) wheelchair user dwellings.
- need to change the number of housing units or housing mix approved at planning approval stage

We already know that the minimum nationally described space standards are not sufficient for developers to comply with M4(3) wheelchair user dwellings. **Source:** see [Technical housing standards – nationally described space standard](#) para 9: “*The Gross Internal Areas in this standard will not be adequate for wheelchair housing (Category 3 homes in Part M of the Building Regulations) where additional internal area is required to accommodate increased circulation and functionality to meet the needs of wheelchair households.*”

We also know from conversations with developers that many are unaware of this para 9 above. Some developers have discovered that the only way they can achieve compliance with M4(3) wheelchair user adaptable dwelling at DET stage is, for example, to reduce the number of bedrooms from the number approved at planning application stage. This means eg a purchaser thinks they are buying a 3B wheelchair adaptable apartment as approved by

the planning authority but in reality if the occupier needs to adapt it to be wheelchair accessible they are faced with accepting poor circulation areas; reducing the number of bedrooms or making structural alterations beyond the scope of M4(3) wheelchair user dwellings. We do not believe this is acceptable. Other examples are

- no space for corridors outside the apartment wide enough for wheelchair users;
- no space allocated for chairlift or lift as required in M4(2) accessible and adaptable dwellings
- no 1500x 1500 circulation space immediately outside communal lifts or entrance door to apartment enable wheelchair user to navigate entrance doors;
- no storage or transfer space for wheelchairs close to the entrance door.

We are also happy to work with the council on the Planning Guidance SPG on this issue but this SPG will be irrelevant if planning permission is still granted on the basis of an incorrect footprint or building envelope.

We therefore strongly recommend that the council inserts in para 6.65 a new sentence “**Planning permission will not be granted** unless the applicant provides evidence that the proposed development is based on the correct footprint and building envelope to deliver detailed drawings at a later stage compliant with M4(2) accessible and adaptable dwellings and M4(3) wheelchair user dwellings.”

P 386: Comment 251: The Disability Forum Planning Group warmly welcomes the addition of a new sentence to paragraph 6.314 as follows: “The TA should consider accessibility from the perspective of disabled people or people with mobility impairments. Further guidance on this is contained within the Mayor of London’s Accessible London SPG” Source: MC195

We would expect the council to provide additional guidance on how to consider accessibility from the perspective of disabled people or people with mobility impairments in the Planning Guidance SPG. We would be happy to work with the council on this.

**Hammersmith and Fulham Disability Forum Planning Group
22 May 2017**