

The Hammersmith & Fulham Disability Forum

Response on MALP Housing Standards: June 2015: FINAL

Introduction

1. Hammersmith and Fulham Disability Forum (DF) is a user led group of disabled residents and older disabled residents hosted by Action on Disability.
2. We work on behalf of the 20,403 (27.05%) households with at least one person with a disability or limiting long term illness.

Source: 2001 census. www.neighbourhood.statistics.gov (KS21) updated 9 November 2004.

2011 census included 22,958 (12.6%) people in Hammersmith and Fulham who self reported that their day to day activities were limited due to long term illness or disability.

3. Whether we look at statistics on households or individuals with a long term illness or disability they include people with a physical impairment, older disabled people, deaf or hard of hearing people, blind and visually impaired people, people with a learning difficulty or mental health problems as well as people living with long term illness. Please note that disabled people or people with a long term illness are represented in all equality groups as defined by Equality Act 2010. In this response we refer to these people as disabled people or disabled visitors as appropriate.
4. Disabled people like everyone else aspire to
 - Accessible and inclusive housing they can afford to rent or buy
 - Employment opportunities that pay more than being on benefit
 - Education and training opportunities
 - take part in community activities
 - use accessible and inclusive transport and pedestrian environment
 - being supported by accessible and inclusive housing, health and social care services that meet their needs.
5. The Disability Forum Planning Group meets on the first Wednesday every month to discuss planning and development issues. Every month a volunteer comments on relevant planning applications validated in the previous month. The Group selects 4/5 planning applications to review with the relevant case officer on the third Wednesday every month. After each meeting we send formal written advice to the case officer. Our response is based on scanning nearly 5,000 applications, commenting on 280 applications and reviewing in detail 48 to 50

applications a year; experience of responding to previous LDF and housing consultations as well as the London Plan and various Examinations in Public.

6. We act as a local Access Group for planning and development in Hammersmith and Fulham. Two members of the Planning Group are existing members of the London Access Forum and served on the GLA access planning subgroup run by the GLA until it was disbanded.

MALP: Housing Standards.

7. We welcome the Mayor of London's strategy to incorporate:

- Lifetime Homes standards in the London Plan as M4 (2)
- Wheelchair housing standards in the London Plan as M4 (3)

rather than the Government's default minimum standard of M4 (1)

We have 3 main concerns in relation to stepfree access in all new housing; wheelchair accessible housing and accessible parking standards.

1. **M4 (2) requirement for step free access in all new housing.** This is a useful step forward and will open up M4 (2) housing to a wider range of disabled people. However, we notice an exemption from this requirement.

We would be very concerned if the exemption resulted in too many developments justifying that it would be unreasonable to install a lift on short term financial grounds without due regard to the wider picture of housing for future generations.

We recommend that MALP require applicants to justify any proposal not to include a lift in any development on robust and transparent grounds with respect to technical constraints and not just financial issues.

2. **Wheelchair accessible housing:** the Government wants local authorities to justify wheelchair accessible housing by reference to housing need and be able to nominate people to wheelchair accessible housing. We had believed that the Mayor had robust evidence across London going back some years on demand for wheelchair housing that would mean individual boroughs would not need to provide their own evidence of the need for wheelchair accessible housing.

However, we now understand that if boroughs want housing to be wheelchair accessible from the start they are required to justify this by reference to wheelchair housing need in the borough and nominations to wheelchair accessible housing at planning application stage.

We are not sure how this will work given long lead times between planning

application approvals and completion and occupation of the housing development. We consider that any requirement for boroughs to nominate named individuals eligible for wheelchair accessible housing is short sighted. First of all, when boroughs identify a disabled person who needs wheelchair accessible housing (affordable rent or intermediate housing) the wheelchair accessible housing need is immediate not sometime in the future. Secondly, this process may not identify disabled people able to purchase market wheelchair accessible housing units. Again the wheelchair accessible housing need is immediate not sometime in the future.

We understand that the balance of 10% wheelchair housing in the development is to be wheelchair adaptable housing units across all tenures. If this is the pattern for most M4 (3) housing then the full circulation space within the wheelchair adaptable housing unit and access routes to it must be approved at planning application stage to ensure that future occupiers do not have to remove walls or compromise on space requirements when adapting housing unit into a wheelchair accessible housing unit. We are also concerned to ensure that all new wheelchair housing units are marked up on plans shared with prospective purchasers or occupiers so wheelchair units are available for future wheelchair users and not disappear into general housing.

We recommend that:

- **The percentage of wheelchair accessible housing should be established not solely by named occupation, but also by established need shown by GLA research and local JSNAs.**
- **If there is a remaining balance of the 10%, that is to be wheelchair adaptable housing, it should be of adequate size so as not to compromise space standards, corridor and access turning circles, or storage, as would be appropriate to M4(3) Wheelchair Housing Standards.**
- **These units should marked up on the plans as wheelchair accessible housing or wheelchair adaptable housing units for the lifetime of the development and actively marketed as such whenever sold for the lifetime of the development.**

3. **Accessible Parking standards:** We are not assured that the MALP Parking Standards clarifies any issues for blue badge holders so our comments on accessible parking for blue badge holders relate to MALP on Housing Standards.

Building Regulations AD M1: 2015 will become the minimum standard for housing for the ***London Plan***. See para 2.12 for parking space and 2.13 for drop off point for M4 (2) housing (previously Lifetime Homes standards). See para 3.12 for parking space and 3.13 for drop off point for M4 (3) housing (previously wheelchair housing standards).

These paragraphs do not include standards on numbers/provision of accessible parking bays in residential developments or advice on managing accessible parking bays during the lifetime of the residential development for

blue badge holders. Many developments in London are for apartments not single dwellings.

We are disappointed by these omissions and consider that they discriminate against blue badge holders who need accessible parking in residential developments.

We also notice the vertical height is 2.2m which means that blue badge holders in high topped vehicles will not be able to reach a designated accessible parking bay.

We also notice that ***Building Regulations AD M2: 2015*** for non-residential buildings has more detail and also cross references **BS8300: 2009 + A1: 2010** for more information on accessible parking standards.

We recommend that wherever *Building Regulations AD M1: 2015* and *Building Regulations AD M2: 2015* are silent on key issues that the Mayor re-issues his current policies on:

- **numbers/provision of accessible parking bays for residential developments**
- **vertical height of 2.6m in multi-storey car parks so blue badge holders in high topped vehicles are able to reach a designated accessible parking bay.**
- **management of accessible parking for blue badge holders as already set out in his London Plan, Housing SPG and Accessible London SPG and where appropriate it would be helpful to reference BS8300: 2009 + A1 2010.**

8. Finally, we also welcome the Mayor's proposal to increase the internal ceiling height in dwellings from 2.3 to 2.5m because London is a warm city.

**Hammersmith and Fulham Disability Forum Planning Group
20 June 2015**