Monitoring the Implementation of Lifetime Homes in London

London Plan Research Project June 2008

Prepared by Savills

savills.com/planning

savills

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Executive Summary

This report sets out the **findings of a study** carried out between February and June 2008 into the implementation of the London Plan Policy on Housing Choice (3A.4/3A.5), which calls for all new homes to be built to Lifetime Homes (LTH) standards.

Section 2 (Introduction) sets out the national and regional policy and guidance framework for the delivery of Lifetime Homes, including the recent raft of initiatives from central Government and changes at City Hall. This context is summarised in Table 1: Delivering and Monitoring Lifetime Homes to 2013.

The **study methodology** is set out at the beginning of subsequent sections of this report. In summary the study involved:
- An internet search of borough policy and guidance and Annual Monitoring Reports;
- A questionnaire survey of all boroughs (with 22 boroughs participating, a response rate of 64%);
- Interviews with GLA officers;
- Discussions with officers at LB Tower Hamlets who are piloting the Accessible Housing Register;
- Discussions with Crest Homes, Countryside Properties and Ballymore Homes;
- Discussions with six architectural practices (Allies and Morrison, Hawkins Brown, John Thompson and Partners, Levitt Bernstein, MAE and PRP);
- A review of 15 permitted schemes; and
- A review of three built schemes.

Section 3 (Borough policy, guidance and monitoring) sets out the evidence collected on how the 33 London planning authorities have embedded the London Plan policy into their development plans and guidance and how they have interpreted LTH standards. It also sets out what, if any, monitoring of delivering LTH is currently being undertaken and how this could be improved upon in the future. Key findings include:

- The majority of boroughs (22 or 66%) either do not have a LTH policy in their UDP or have a policy which has expired. Slightly fewer (20 or 64%) of boroughs have no extended UDP policies relating specifically

to wheelchair accessible housing. In these cases London Plan Policy 3A.5 provides the only development plan policy that requires LTH and wheelchair accessible housing.

- Extended UDP policies for LTH and wheelchair accessible housing vary in the way they are framed and provide varying degrees of exhortation and flexibility. This is particularly true for wheelchair accessible housing, where a number of boroughs have differing thresholds for triggering the requirement to incorporate wheelchair accessible housing.

- Just over half (55%) of boroughs have SPG relating to LTH, although the level of detailed guidance is generally not that great and some relate to expired UDP policies and have little weight.

- As LTH standards become embedded in the Code for Sustainable Homes, communal areas/facilities and the approaches to people's homes will become more important issues in terms of ensuring accessible housing.

- In the longer term, it would be sensible to undertake a more fundamental review of London Plan Policy 3A.5 (reflecting the context of the time) to be clearer that the three strands of dwelling mix, size and accessible housing all have to be complied with across all tenures.

- There is a potential role for local access groups and community access monitors to help develop useful and effective policy and guidance.

- Only a small number of boroughs have been monitoring the delivery of LTH and/ or wheelchair accessible homes - although they are now required to include information in their returns for the London Development Database and the GLA intend to include information from the LDD in its London Plan Annual Monitoring Report.

- A standardised method of monitoring both types of housing would allow more meaningful comparisons of implementation across the boroughs and a good practice note would help boroughs with their new requirement to monitor.

- Only four boroughs stated that they had checked compliance on site and this was in response to specific complaints.

- The introduction of the requirement to submit Design and Access Statements for most applications does not appear to have improved the monitoring of London Plan Policy 3A.5.

- The assessment regime for the Code of Sustainable Homes introduces a fairly good degree of compliance checking for those developments where a certificate is sought for Level 6 and above at present (to include Level 3 by 2013).

- The Accessible Housing Register should provide an important source of information on accessible housing in the social rented sector.

The report makes seven recommendations in relation to Policy and Guidance and seven recommendations in relation to Monitoring.

Section 4 (Implementation) sets out the results of a survey of all boroughs on the implementation of LTH policy and guidance. It also sets out the findings of a review of a small sample of permitted and built schemes and of discussions with a number of architectural practices and developers who are helping to deliver new homes in London. Key findings include:

- Boroughs tend to use planning conditions (as opposed to obligations) for securing LTH and wheelchair accessible housing;

- The importance of boroughs being satisfied that it is possible to incorporate satisfactory LTH and (importantly) wheelchair accessible homes in a scheme at the time the substantive decision is made. This is particularly important for outline applications;

- Planning conditions that require approval of detailed aspects of the LTH standard should only be used for elements which do not affect the size or layout of the proposed homes. Model planning conditions would assist boroughs;

- There is insufficient information to draw a conclusion on the impact that Disability Equality Schemes have had on the implementation or monitoring of London Plan Policy 3A.5;

- Discussions with representatives from the architectural practices raised a number of issues and misunderstandings that are responded to in detail in the report. The main conclusions drawn from the issues raised can be summarised as follows:

  - The need to re-emphasise the principle/objective of the LTH concept; that of 'visitability' and 'adaptability';
  - The need for the evidence to be provided more clearly to developers and designers of the need, costs and regularity of subsequent adaptation works.
  - Concern at the amount of guidance that exists and the need to clarify certain aspects of the standards (set out in detail in Section 4);
  - The level of detail required at planning application stage is particularly onerous for practices that are paid on a submission or 'on results' basis;
  - A revised Mayor's SPG on inclusive environments should continue to provide a baseline which allows individual boroughs to go beyond on the basis of verifiable local intelligence.
  - The GLA should take account of the findings of this research when drafting the proposed 'Housing Design' Guide.
  - The LTH concept needs to be aligned with and re-enforce the sustainable development agenda (e.g. sustainable adaptable homes are best achieved if they are dual aspect and avoid the use of pumps where possible).
  - There is a need to clarify certain aspects of guidance
  - There are misunderstandings and a lack of clarity in the existing guidance.

- The developers who were interviewed all accepted the need for proposed housing in London to meet LTH standards, although they considered that it would be more appropriate in the future to secure LTH standard homes via Building Regulations rather than Planning. This was because the planning application stage was considered too early in the development process to consider all the necessary detail and many planners lacked the necessary skills and time to properly engage with the LTH concept.

- Some concern was expressed by developers level entry shower has on service provision. There was also some concern at the lack of clarity of some of the criteria (space in front of a WC being referred to).

- Both architects and developers generally considered Access Officers to be helpful.

- A key message from visiting built schemes is the importance of ensuring that the common parts of buildings and their surroundings are accessible. These generally fall outside of the 16 LTH criteria and so need to be addressed in other ways.

- The report makes 12 recommendations in relation to Implementation at the implications LTH has for room sizes, with greater space being required for circulation, and the constraint that provision for a possible future ceiling hoist and and their surroundings are accessible. These generally fall outside of the 16 LTH criteria and so need to be addressed in other ways.

The report makes 12 recommendations in relation to Implementation.

Introduction

This section introduces the need for Lifetime Homes in London before setting out the scope of the study and the structure of this report of findings.

Housing need

In August 2005, the GLA and the boroughs published the London and Sub-Regional Strategy Support Studies report on the housing needs of Londoners.[i] This combined 27 borough housing needs surveys and contained information on 40,000 households. The report includes information about households with one or more disabled people broken down into 'special needs'[1] groups: frail elderly, physically disabled, learning disability, mental health problem, severe sensory disability and other. The report found that disabled Londoners are twice as likely to be living in unsuitable housing as other groups, with nearly a third (130,000) of London's 'special needs' households living in unsuitable housing.

While the needs of some of these households living in unsuitable accommodation could be met in their existing homes, with minor interventions, for others the solution would involve a move to accessible, adapted or supported housing. If all new housing is built to Lifetime Homes standards, the number of households that need to move in the future may be reduced.

Background to Lifetime Homes in London

Lifetime Homes (LTH) were originally devised and promoted by the Joseph Rowntree Foundation (JRF) in 1991[ii]. When originally conceived the LTH criteria were usually applied to modest semi-detached or terraced homes with their own front door to street or garden, adjacent parking space, and bedrooms upstairs. Today, particularly in London, the objectives of making best use of scarce urban land, accommodating growth and delivering mixed and sustainable communities mean that the majority of residential schemes are for dense multi-storey dwellings. The challenge is to ensure that these

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[1] The terms 'special needs' and 'disability' used in this report reflect not the capabilities of the individual but the failure of society to allow the individuals to live as they would wish. It is not the disability that is the 'problem'; it is the way that society reacts (or not).

developments also achieve the essential objectives of the LTH concept; those of 'visitability' and 'adaptability'.

The Mayor defines the principles of inclusive design as those that will require that developments:

- Can be used safely, easily and with dignity by all regardless of disability, age, gender, ethnicity or financial circumstances;

- Are convenient and welcoming with no disabling barriers, so everyone can use them independently without undue effort, separation or special treatment;

- Are flexible and responsive taking account of what different people say they need and want, so people can use them in different ways; and

- Are realistic, offering more than one solution to help balance everyone's needs, recognising that one solution may not work for all.

The objective is to produce environments that are sufficiently flexible to respond to a wide and evolving range of needs. Accessible and adaptable homes are an essential contributor to the achievement of this objective. By enabling people to stay put for longer they contribute to:

- The development of inclusive communities/neighbourhoods;

- A reduction in the need for domiciliary services and costly and unsightly adaptations and or equipment;

- A reduction in the number of premature or inappropriate moves to supported housing; and

- The maintenance of local social and support networks.

In these respects the design principles also contribute to/chime with those of sustainable development. The 16 LTH Standards developed in 1991 established a simple set of rules, which if correctly interpreted could deliver the accessibility (visitability) and adaptability required.

The London Plan (February 2004) included Policy 3A.4 (Housing choice) in order to seek to ensure that all new housing is built to 'Lifetime Homes'. This

policy, with minor amendments to the policy wording and justifying text, has been maintained in the London Plan (Consolidated with Alterations since 2004), which was published in February 2008; as has Policy 4B.5 (Creating an inclusive environment), which makes clear that the Mayor will require all future development to meet the highest standards of accessibility and inclusion[iii]. The Mayor of London has published the following planning guidance to help implement these policies:

- Accessible London: achieving an inclusive environment Supplementary Planning Guidance (SPG) (2004)[iv];

- Housing SPG (2005)[v];

- Accessible London: achieving an inclusive environment, Lifetime Homes Case Studies (2006)[vi];

- Wheelchair accessible housing: designing homes that can be easily adapted for residents who are wheelchair users Best Practice Guidance (2007)[vii]; and

- Planning for equality and diversity in London SPG (2007).[viii]

The LTH case studies published in 2006 sought to inspire and instruct London's developers. Whether the challenge has been met is one question this study sought to address.

A number of questions have been asked by Greater London Assembly Members over the last two years about the amount and percentage of new homes that are being built to LTH standard and to be wheelchair accessible (or easily adaptable).

Scope of study

Savills were appointed by the Greater London Authority (GLA) in February 2008, in part to establish facts in order to answer questions by Greater London Assembly Members. This report sets out the findings of a study carried out between February and June 2008 into the implementation of the LTH element of London Plan Policy 3A.4 (now Policy 3A.5). Specifically, in

accordance with the Brief for Consultancy Work (January 2008), this report seeks to:

- Establish whether the Lifetime Homes policy is being implemented effectively by the London Boroughs, and by house builders and housing associations developing new homes in London;

- Identify any examples of good practice and/or any blockages in its implementation, either within the boroughs' or with housing developers' practices and procedures and make recommendations accordingly;

- Recommend how to effectively monitor implementation of this policy in the future; and

- Recommend whether there is a need to provide any further policy guidance.

Savills' response to the GLA's Brief, accepted by the client, proposed a specific methodology for delivering the required outputs. This methodology is set out in detail n the subsequent sections of this report.
London Plan Policy 3A.4 (now 3A.5) also seeks to ensure that 10 percent of new housing is designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users. The opportunity was taken to collect some information on the implementation of this element of the policy as part of the study and this report sets out the findings.

The project team at Savills comprised Clare Goodridge, Graham Harrington, Roger Hepher, Sarah Houmoller and Ricardo Rossetti.

Structure of document

The remainder of this report is structured as follows:

Section 2 – This sets out the national and regional policy and guidance framework for the delivery of LTH, including the recent raft of initiatives from central Government.

Section 3 – This section sets out the evidence collected on how the 33 London planning authorities have embedded the London Plan policy into their development plans. It also sets out how boroughs have interpreted LTH standards in their planning guidance and what, if any, monitoring of delivering LTH is currently being undertaken.

Section 4 – This sets out the results of a survey of all boroughs on the implementation of LTH policy and guidance. It also sets out the findings of a review of a small sample of permitted and built schemes and of discussions with a number of architectural practices who are helping to deliver new homes in London.

Section 5 – This section sets out all the key conclusions and recommendations for improving the delivery and monitoring of LTH standard housing in London.

Context

Introduction

This sets out the national and regional policy and guidance framework for the delivery of Lifetime Homes, including the recent raft of initiatives from central Government.

Lifetime Homes Champion. The baton for promoting LTH passed from the Joseph Rowntree Foundation (JRF) to Habinteg Housing Association. Habinteg, with funding from JRF and the Department for Communities and Local Government, is updating guidance on its web site www.lifetimehomes.org.uk and is working with the British Standards Institution on developing its draft Code of Practice and with the BRE on training assessors of the Code for Sustainable Homes.

Building For Life. The Commission for Architecture and the Built Environment (CABE) launched Building for Life in 2003. It is lead by CABE and the House Builders Federation and is supported by the Civic Trust, Design for Homes, English Partnerships and the Housing Corporation. It is voluntary award scheme which seeks to set a national benchmark for well-designed housing and neighbourhoods in England. It is awarded to new housing projects that demonstrate a commitment to high design standards and good place making. There are two standards. Silver standard winners must fulfil 70% of the Building for Life criteria, whereas Gold standard winners must fulfil 80% or more of the Building for Life criteria.

There are 20 criteria[ix]. These include number 15; 'Do internal spaces and layout allow for adaptation, conversion or extension?' This criterion refers to, but does not require compliance with, JRF's LTH standards. The Communities and Local Government's Disability Equality Scheme (2006) x
Requires an overview of whether departmental measures to encourage accessible housing and environments within the Thames Gateway developments are successful. CABE has commissioned a study into the quality of development in the Thames Gateway and this will include the auditing of between 30-60 schemes and include considering whether Lifetime Homes standards have been met.

Housing Corporation Design and Quality Strategy and Standards. The Housing Corporation published its current 'Design and Quality Strategy'xi and 'Design and Quality Standards'xii in April 2007.

The overarching Strategy sets out how the Corporation defines good design and quality and why it thinks that good design is important. It includes (page 19) a commitment to increase the number of homes built to Lifetime Homes within its 2008-11 National Affordable Housing Programme and to including this as a mandatory standard in future programmes. In doing so, it encourages affordable housing providers to utilise the four additional code points for LTH provision within the Code for Sustainable Homes.

The Standards document sets out core performance standards which are the minima that are expected in return for the public funds invested by way of Social Housing Grant. These include meeting Code for Sustainable Homes Level 3, stating "Affordable housing providers are encouraged to utilize the available four additional Code points for LTH within the Code." The Recommendations Annex sets out further enhanced standards that will improve the design and quality of schemes and which will be taken into account in allocating funds. LTH are referred to in Enhanced standards (Page 23).

English Partnerships. English Partnerships require adherence to its quality standards for all projects that it supports. The Quality Standards (Places, Homes, People)[xiii] require compliance with LTH under the 'Quality Homes and Buildings' theme. English Partnerships has also published a Guidance Note on Inclusive Design which encourages developers to consider the benefits of an Inclusive Design approach in their developments[xiv].

Draft Mayor's Housing Strategy. The draft Mayor's draft Housing Strategy (published by the previous administration in September 2007)[xv] makes a number of relevant policy statements. Policy Statement 2.1 – Improving Design includes the following two relevant commitments:

> 2.1.a. This commits Design for London to codify existing standards and good practice to develop and promote a Housing Design Guide to achieve excellence, clarity and consistency on standards for housing development in London. The findings of this report will help Design for

London prepare the Housing Design Guide, which is due to be published in draft in November 2008.

2.1 d. This makes clear that the Mayor will, and boroughs and members of the Housing Investment Panel should, ensure that all new developments achieve high standards of accessibility and inclusion to meet a diverse range of needs and seek to ensure that all new housing is built to Lifetime Homes standards and ten per cent is designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users.

Policy Statement 3.1 – Meeting Needs includes the following two relevant commitments:

3.2.a. Social landlords should participate fully in Capital Moves, the single pan London system for accessing all social rented and intermediate homes and a range of private rented homes, incorporating the London Accessible Housing Register, to be launched in 2009.

3.2.d. Social landlords should adopt the Accessible Housing Register toolkit to enable the categorisation of properties' accessibility and the eligibility of disabled applicants across London.

It should be noted that the Housing Design Guide is only intended to apply to publicly funded affordable housing and GLA/LDA controlled sites.

Draft for Development Code of Practice. In December 2007, the British Standards Institution published a Draft for Development of a Code of Practice[xvi] for the design of accessible housing. Building upon the original LTH standards, it extends the criteria to flats and town houses and updates the technical criteria. The document provides for the significant strengthening of LTH standards, particularly in relation to the common parts of residential developments, the provision of lifts and the provision of properly accessible sanitary facilities.

Recent Changes to context

A number of significant events happened during the course of the study. These can be summarised as follows:

- The London Plan (Consolidated with Alterations since 2004) was published in February 2008;

- The GLA confirmed that it will be collecting information on permitted LTH standard and wheelchair accessible homes contained within planning permissions from April 2008;

- The Government published 'Lifetime Homes – Lifetime Neighbourhoods: A national Strategy for Housing in an Ageing Society (February 2008)xvii

- The Government published 'The Code for Sustainable Homes: setting the standard in sustainability for new homes (February 2008)xviii and Code for Sustainable Homes: Technical Guide (April 2008)[xix];

- The Government published its draft 'Independent Living Strategy (March 2008)[xx];

- The extension of the Mayor's planning powers (April 2008); and

- The election of a new Mayor of London and London Assembly on 1 May 2008, with the Mayor stating that he intends to change the London Plan to ensure it addresses needs of older people and helps secure vibrant, mixed communities, including the promotion of 'Lifetime Homes'[xxi]

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The London Plan. The review of the London Plan has led to some amendments to Policy 3A.4 (now 3A.5) on Housing Choice. The consolidated London Plan Policy 3A.5 differs from the previous Policy 3A.4 in the following terms:

- It no longer refers to "such as students, older people, families with children and people willing to share accommodation" when seeking to ensure that new developments offer a range of housing choices (bullet 1); and

- Reflecting work that has been carried out on developing and implementing an Accessible Housing Register, it no longer refers to "the Mayor will investigate the feasibility of establishing a London register of accessible housing in both the public and private sector."

The justifying text no longer refers to changing lifestyles (former paragraphs 3.17 and 3.18), but includes a reference to the incorporation of a London register of accessible housing in the proposed Pan-London Choice and Mobility Scheme. Footnote 10 refers to Joseph Rowntree Foundation (JRF) Meeting Part M and Designing Lifetime Homes (1999)xxii and, significantly, the BSI Draft for Development (DD266:2007) Code of Practice, which, as outlined above, is more demanding in certain respects. For the purposes of this study, Lifetime Homes standard was taken as being as defined in the JRF document (as referred to in the London Plan 2004).

GLA Monitoring. Following the agreement of 22 boroughs, the 66% required, the GLA is able to require all boroughs and the City of London Corporation to provide information as part of the London Development Database returns on permitted LTH standard and wheelchair accessible homes contained within planning permissions. Boroughs have begun to provide information (on-line 'returns') on accessible housing in May 2008 and GLA officers will be monitoring the returns to ensure that the new requirement is being complied with. This issue is addressed more fully in Section 3 under Monitoring.

Strategy for Housing in an Ageing Society. This Strategy sets out the Government's plans for making sure that there is enough appropriate housing available in future to relieve the forecasted unsustainable pressures on homes, health and social care services. Section Three addresses housing in detail, both in terms of LTH (Chapter 7) and the new concept of Lifetime Neighbourhoods (Chapter 8). Section 5 sets out the key action points for making Lifetime Homes Standards the norm for new housing. These are:

> "To monitor how the new homes market is developing in this respect a review of the up-take of Lifetime Homes Standards across all sectors will be undertaken in 2010.

If actual and predicted up-take are not sufficient to meet identified needs, consideration will be given to the need to regulate for Lifetime Homes in Part M of the Building Regulations.

This timetable fits alongside the other changes which are also planned to address climate change." …. that is the Code for Sustainable Homes

Code for Sustainable Homes Performance Standards. The Code for Sustainable Homes was introduced in April 2007. It is a voluntary standard designed to improve the overall sustainability of new homes by setting a single framework within which the home building industry can design and construct homes to higher environmental standards and offers a tool for developers to differentiate themselves within the market. The 'Setting the standard in sustainability for new homes' document (February 2008) sets out the performance standards required for the Code and the assessment process. The performance standards have been amended to make Lifetime Homes a mandatory element at Code level 6 from April 2008. The Lifetime Homes standards will be mandatory at Code level 4 from 2010 Code level 3 in 2013. The Code for Sustainable Homes: Technical Guide (referred to above) sets out how new homes are to be assessed in relation to the Code and Section 3 (Code for Sustainable Homes Monitoring) discusses how compliance with LTH standards will be assessed.

Independent Living Strategy. This draft Strategy has been prepared by the Office for Disability Issues, which is the focal point within government to coordinate disability policy across all departments. The Strategy sets out a five-year plan that seeks to realise the Government's aim that all disabled people (including older disabled people) should be able to live autonomous lives, and to have the same choice, freedom, dignity and control over their lives as non-disabled people.

The housing aspects of the Strategy seek to take action to maximise disabled people's housing opportunities and choices by:

• Increasing the provision of housing advice and information;

- Updating the LTH standard, making it an essential element in the Code for Sustainable Homes and making adherence to it mandatory for all public sector funded housing by 2011;

- Setting a clear target for the construction of all new housing to Lifetime Homes standard by 2013, with a commitment to review progress against this target by 2010;

- Encouraging the adoption of Accessible Housing Registers and supporting the dissemination of good practice models;

- Investing in rapid response repairs and adaptations services;

- Developing a method to enable early identification of individuals who are at risk of health and care crises;

- Increasing funding for, and improving, the Disabled Facilities Grants (DFG) system; and

- Continuing to invest in the Supporting People programme which promotes independent living by providing housing related support.

The Mayor's new planning powers. The Mayor of London was given additional planning powers in April 2008 in relation to considering and determining strategic planning applications that are referred to him by the boroughs. The way the Mayor's new planning powers work in practice is set out in the Town and Country Planning (Mayor of London) Order 2008[xxiii] and Circular 1/2008[xxiv], which came into effect on 6th April 2008. The additional powers include:

- A change in the definition of strategic application so that schemes which would provide 150 or more homes are referable to the Mayor and subject to his power to direct refusal (the current threshold is 500); and

- The Mayor will be able to 'call-in' certain strategic planning applications for his own determination where certain policy tests are met (currently the Mayor has only the negative power of directing refusal of applications referred to him).

The Greater London Authority Act 2007[xxv] provides a power for the Mayor to direct that changes be made to a borough's Local Development Scheme (the local authority's work plan for the production of Local Development Documents) to ensure that that key policies of the London Plan are reflected in the LDD programme. This power was brought into effect by Town and Country Planning (Mayor of London) Order 2008.

Expected changes to policy/guidance framework

The following further changes are expected over the short-term:

- Preparation of the Mayor's Housing Design Guidelines (Autumn 2008);

- Review of the Mayor's Inclusive Design SPG (timetable to be confirmed);

- Roll out of the Mayor's Accessible Housing Register; and

- Publication of a new draft Mayor's Housing Strategy (2009).

Summary Table. Table 1 summarises the current and expected national and regional policy and guidance framework and how it impacts upon the delivery and monitoring of LTH standard homes.

Delivery							
Agency		**2008**	**2009**	**2010**	**2011**	**2012**	**2013**
Habinteg	Lifetime Homes Champion	►►►►►►►►►►►►►►►►►►►►►►					
CLG/CABE	Building for Life Awards	►►►►►►►►►►►►►►►►►►►►►►					
CLG/HC/EP	Housing Corporation + EP Standards	►►►►►►►►►►►►►►►►►►►►►►					
BSI	Draft for Development (DD266:2007) • Review (at latest) + produce British Standard		■				
CLG	Strategy for housing in an ageing society * Review + consider need for Building Regulation			■			
CLG	Code for Sustainable Homes • LTH mandatory for Level 6 • LTH mandatory for Level 4 • LTH mandatory for Level 3	■		■			■

ODI	Independent Living Strategy						
	LTH mandatory for all new public sector funded homes				■		
	LTH mandatory for all new homes						■
MoL	London Plan Policy	■					
	Mayor's Housing Strategy	▨					
	Housing Design Guide	►►►►►►					
	Inclusive Design SPG Review	►►►►►►					
Boroughs	Borough DPDs	►►►►►►►►►►►►►►►►►►►►►►►					
	Borough SPDs	►►►►►►►►►►►►►►►►►►►►►►►					
Monitoring + Information							
CLG	Code for Sustainable Homes Assessment	►►►►►►►►►►►►►►►►►►►►►►►					
MoL	London Development Database (April 2008 onwards)	■					
	Accessible Housing Register roll-out		▨				
Boroughs	Monitoring planning permissions (April 2008 onwards)	■					

Borough policy, guidance and monitoring

Introduction

This section sets out the evidence collected on how the 33 London planning authorities have embedded the London Plan policy into their development plans and guidance and how they have interpreted LTH standards. It also sets out what, if any, monitoring of delivering LTH is currently being undertaken and how this could be improved upon in the future.

Methodology

Research for this section included the following:

Internet Search of Policy and Guidance. A through internet search of all borough websites was undertaken to identify the key relevant policy and guidance for LTH and wheelchair accessible housing. These results were cross-referenced against the boroughs' Local Development Schemes (LDSs) and information supplied by GLA officers.

The research involved determining which Unitary Development Plan (UDP) policies have been 'extended' (see Policy and Guidance below) and identifying the Supplementary Planning Guidance (SPG) that supports these extended policies.

The research also considered the boroughs' emerging Local Development Frameworks (LDFs). Development Plan Documents (DPDs) are the statutory 'development plan' element of the LDFs. All boroughs have to prepare a Core Strategy DPD and all are proposing to bring forward one or more other DPDs (such as Site Allocation, Development Control Policies, Waste and Area Action Plans). This research confined itself to considering Core Strategies that had reached at least the Preferred Options stage and relevant adopted Supplementary Planning Documents (SPDs).

Internet Search of Annual Monitoring Reports. A through internet search of all borough Annual Monitoring Reports (AMRs) was undertaken to identify

the extent to which boroughs are monitoring the provision of LTH and wheelchair accessible housing.

Borough Questionnaire. A questionnaire, set out in Appendix A1, was sent by both post and e-mail to the 'Head of Planning' and Policy and Development Control managers of each borough. It was also copied to borough Access Officers. Question 11 asks boroughs to provide details of the number of LTH standard and wheelchair accessible homes permitted and built in 2007. Question 12 asks those authorities who are collecting this data to provide details on how it collects it. Question 13 asks whether Design and Access Statements set out the proposed number of homes to be built to LTH standard and wheelchair accessible standard and Question 14 asks about the use of post completion checks of completed schemes. A total of 22 boroughs had responded, a response rate of about 66%.

Interviews with the GLA officers responsible for managing the London Development Database and preparing the London Plan Annual Monitoring Report.

Discussions with housing officers in the LB Tower Hamlets (who are piloting the Accessible Housing Register) and with the acting chief executive of Ownership concerning the requirement for sellers of homes in Scotland to prepare a 'Home Report' (which includes the need for an access audit).

Policy and Guidance

Background. The current development plan system gives both the London Plan and UDPs (together with the DPDs that will replace them) 'development plan' status. The Planning and Compulsory Purchase Act 2004 makes clear (Section 38 (5)) that where there is a conflict between these two parts of the development plan, the conflict must be resolved in favour of the policy which is contained in the latest document.

The situation is made more complex by the fact that the Act automatically 'saved' UDP policies for a three year period ending on 27th September 2007. This was in the belief that boroughs would bring forward their DPDs during

this period. For a number of good reasons, DPD production has been slower than expected. Currently only LB Redbridge has an adopted Core Strategy, although the LB Havering's Core Strategy has been found by an Inspector to be 'sound', although it is not yet adopted. The Act made provision for the Secretary of State to make a direction to extend specified policies beyond this date until they are replaced by DPDs. The Government Office for London (GOL) has, therefore, had to decide which UDP policies should be extended and which should be allowed to 'expire'.

The Act required councils to review their existing policies against criteria issued by the Department for Communities and Local Government (CLG) and submit a list of those it wished to extend to GOL. To assist, CLG prepared a Protocol[xxvi]. The boroughs had to demonstrate that the policies they wanted to be extended reflected the principles of local development frameworks; were consistent with current national policy; and that it was not feasible or desirable to replace them by 27 September 2007. Importantly, the criteria also included the need for such policies to be in general conformity with the London Plan and the Mayor of London was consulted on requests before GOL made a decision.

The Secretary of State has issued a Direction (under paragraph 1(3) of Schedule 8 to the Act) for each borough, setting out which policies are extended. Where UDP policies have expired, the London Plan provides the statutory 'development plan' policies until such times as the boroughs' adopt their relevant DPD.

Internet Search of Policy and Guidance - Key Findings. Full details of the policy and guidance audit, by borough, is set out in Appendix A2. A summary of the position as of April 2008 is set out in Appendix A3.

Extended UDP/Adopted DPD Policies – Lifetime Homes. The key findings are that:

- 33% (11) of boroughs have extended (or in Redbridge's case adopted DPD) policies relating specifically to LTH. These plans were all adopted after 2004, when the London Plan policy was first introduced.

- 30% (10) of the boroughs have extended general policies that encourage accessible or mobility housing

- 30% (10) of the boroughs have expired general policies that encourage accessible or 'Mobility' housing

- 6% (2) of the boroughs do not cover LTH or accessible/Mobility housing in their expired policies

This means that for 66% (22) of the boroughs, London Plan Policy 3A.5 provides the only development plan policy that requires LTH.

UDP policy requirements vary. Less than half of the 11 boroughs have an extended policy which are framed along similar lines to London Plan Policy 3A.5 of '*when considering new housing development and conversion proposals, the council will* <u>*seek to ensure*</u> *it is built to Lifetime Homes Standards.*' Other boroughs have included a more flexible approach to the inclusion of LTH, including phrasing such as; *'will encourage',* and *'should aim to incorporate.'* Bellow are two examples of how councils are approaching LTH into their existing policy.

'*Housing will only be permitted if it is designed and laid out so as to have an element of flexibility and adaptability to meet the changing lifestyle needs of potential residents.'*

'New housing should be built to Lifetime Homes standards. Conversions should aim to incorporate as many of the standards as practicable.
Lifetime Home include the following access requirements:
i. Level or gently sloping approach and flush thresholds.
ii. Entrances illuminated. The main entrance should be covered.
iii. Distance from the car-parking space to the home to be kept to a minimum.
iv. Where car-parking is adjacent to the home, it should be capable of being enlarged to a width of 3.3 metres.
v. Where homes are reached via a lift, this should be wheelchair accessible.'

<u>Extended UDP Policies - Wheelchair Accessible Homes</u>**.** The key findings are that:

- 39% (13) of the boroughs have extended (or in Redbridge's case adopted DPD) policies relating to wheelchair housing

- 24% (8) of the boroughs have extended general policies that encourage accessible housing

- 27% (9) of the boroughs have expired policies – 15% (5) of which are expired general policies that encourage accessible housing and 12% (4) of which are expired policies relating to wheelchair accessible housing

- 9% (3) of the boroughs do not cover wheelchair housing in their expired policies

The 13 boroughs that have extended UDP or adopted DPD policies address wheelchair accessible housing in similar ways, varying slightly from borough to borough, broadly the preferred policy position used throughout London is:

'10 per cent of housing in major development schemes should be designed to be wheelchair accessible homes (as defined by the Wheelchair Housing Design Standards referred to in the London Plan).'

The term '*major development'* varies throughout the London Boroughs between 10, 20 and 25 units. This introduces a threshold which does not exist in London Plan Policy 3A.4 (now 3A.5). Furthermore, a small number of councils are less forceful in relation to wheelchair accessible housing, including phrasing such: *'should be'* and *'dependent upon site suitability'.*

Below are two examples of both a forceful and less forceful approach towards wheelchair accessible homes.

'On sites of 10 units or more, it is expected that 10% of the units should be to wheelchair standards. On smaller sites, one or more units may be negotiated, depending on local demand.' (London Borough of Ealing)

'In residential developments of 25 or more units at suitable sites and locations, the Council will seek to negotiate 10% of dwellings to be built to full wheelchair standard. In the case of private housing, the requirement may be provided as units capable of adaptation to full wheelchair standard without further structural alterations.' (London Borough of Greenwich)

Supplementary Planning Guidance. SPG is non-statutory guidance which provides more detail to policies contained within UDP policies.   The Key findings are that:

- 18 (55%) of boroughs have SPG on LTH

- 6 (18%) of boroughs have SPG on wheelchair accessible homes
- 5 SPGs relate to expired policies (by definition these documents 'supplement' policies and where the policies they supplement have expired the SPG will have very little formal weight).

LTH Standards. 15% of the London boroughs (5) have SPGs which support planning policy on LHS, of these 4 Boroughs, one UDP policy has expired thus reverting back to the position of the London Plan Policy 3A.5

Wheelchair accessible housing. 18 of the 33 boroughs have SPGs which support the term ' Inclusive Design'. Where Boroughs are expected to provided developments … 'With *ease of access for all users as a prime consideration, such as level or ramped access provision, and for internal space and layout to be designed to meet requirements relating to aspects of disability such as wheelchair.*'

There is varied approach to how the London boroughs have addressed their SPGs, this seems to be dependent on the date they were issued i.e. post the introduction of the London Plan alterations (2004) which includes LTH and wheelchair accessible housing as only 7 of the 18 Boroughs refer directly to WAH.

Of the 18 Boroughs only 5 boroughs had SPGs supporting both LTH and wheelchair accessible housing.

Development Plan Documents. Only 30% of boroughs (11) have reached the Preferred Options Stage for their Core Strategies, although it is expected that before the end of 2008 over 80% of boroughs will be a least at this stage.

The LB Redbridge's Core Strategy (the only adopted Core Strategy in London in June 2008) includes Strategic Policy 7, which states:

"A minimum of 9,050 quality dwellings shall be delivered to meet the varying requirements of all residents of the Borough between 2007/08 and 2016/17 by (including):
(b) Providing a mix of dwelling types (including lifetime homes) and sizes to provide real housing choice …"

The LB Redbridge's adopted Borough Wide Primary Policies DPD includes Policy H2 on Housing Choice which states that "furthermore, all new housing shall be built to lifetime homes standard."

The LB Havering's approved (but not yet adopted) Core Strategy includes Core Policy 2, which states that:

"Sustainable, attractive, mixed and balanced communities will be created by (amongst other things):
• Ensuring that in their design and layout new homes provide for the lifetime needs of households."

In the LB Havering's approved (but not yet adopted) Development Control Policies DPD, Policy DC7 states:

"The Council will seek all new homes to be built to Lifetime Homes standards.

10% of all new homes on sites of 15 of more dwellings and on Residential sites of 0.5 hectares or more irrespective of the number of dwellings must be designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users."

All nine boroughs that have reached the Preferred Options stage or beyond have included policies on LTH standard and wheelchair accessible homes.

Emerging policy requirements for LTH are similar to those for UDPs with varying approaches to the policy position, ranging from '*All new housing will be expected to meet Lifetime Homes Standards' to 'Providing a mix of dwelling types (including lifetime homes)'*
 '*Current mobility housing policy is replaced by a Lifetime Homes standards'.* Compared with other Boroughs who still state summarily to policies in extended UDPs

'*10% of units should be designed and constructed to wheelchair accessible / adaptable standards'.*

Supplementary Planning Documents   The Key findings are that:

• Approximately 34 % (13) of boroughs have SPDs which supports both LTH and wheelchair accessible housing.

- Early indications state that over 80% of boroughs by the end of 2008 will have adopted SPD which will cover LTH and wheelchair accessible homes

- Only five of the 9 boroughs who have SPD have included guidance on wheelchair accessible homes. These are boroughs which have a more defined position of providing *'10% of new housing to be wheelchair accessible'.*

A review of the SPDs shows that they provide a similar level of detail as some of the older SPGs and tend not to explain how LTH standards should be applied and implemented. However, Islington has sought to interpret the LTH standards to its particular circumstances and the following is extracted from the LBI draft SPD and replaces the first of the 16 LTH standards.

"There is no presumption that any parking bays will be provided. Where parking is provided then a proportion of the spaces should be capable of enlargement to a width of 3300mm.

"In car-free developments the Access and Transport Assessments should consider the full range of personal and public transport alternatives and their accessibility.
- The policies, procedures and provision of Car Club services are, for example, increasingly accessible.
- Consideration should also be given to the usefulness of mobility scooters in an urban context. Storage and recharge facilities might be provided within the common parts (say beside the lift at ground floor level) but the horizontal travel distance from these facilities to individual dwellings should be no more than 20m. (If stored within the dwelling, there would be implications for the dwelling footprint and the size of lifts)
- The potential to secure a reasonable number of on street bays, for blue badge holders within 50m of the development, should be established.
- Only if that potential does not exist should some facility be provided on site.
- Consideration should also be given to the needs of some disabled people for Home Care and non-resident carer visits, other essential visitors, deliveries and drop-off (the latter for taxis and dial a ride buses).

"See the Sustainable Transport Guidance Note for further advice on the production of inclusive Transport Assessments and Travel plans.

"Note also that the range of transport and travel options agreed will commonly be secured via S106 agreement."

Conclusions and Recommendations

The majority of boroughs (22 or 66%) either do not have a LTH policy in their UDP or have a policy which has expired because it did not meet the criteria set out in the Department of Communities and Local Government's protocol for extending saved policies[xxvii]. In these cases London Plan Policy 3A.5 provides the only development plan policy that requires LTH. Slightly fewer (20 or 64%) of boroughs have no extended UDP policies relating specifically to wheelchair accessible housing.

Extended UDP policies for LTH and wheelchair accessible housing vary in the way they are framed and provide varying degrees of exhortation and flexibility. This is particularly true for wheelchair accessible housing, where a number of boroughs have differing thresholds for triggering the requirement to incorporate wheelchair accessible housing.

Just over half (55%) of boroughs have SPG relating to LTH, although the level of detailed guidance is generally not that great and some relate to expired UDP policy and therefore have little weight.

All boroughs are bringing forward their Core Strategies, other DPDs and SPDs in line with their Local Development Schemes (which are in part project management tools that set out which documents are going to be prepared when). London Plan Policy 3A.5 sits alongside DPD policies on LTH standard and wheelchair accessible homes, with DPD policies required to be in general conformity with the London Plan as a whole.

The review of permitted schemes, discussed in detail in Section 4, highlights the importance of the design of communal areas/facilities and the approaches to people's homes and the successful integration of affordable and market homes. These issues fall outside of the 16 LTH criteria, although addressed in London Plan Policies 4B.5 (Creating an inclusive environment) and 4B.1 (Design principles for a compact city) and need to be addressed as part of broader design guidance. As LTH standards become embedded in the Code for Sustainable Homes and, in all probability incorporated in the Building

Regulations, communal areas/facilities and the approaches to people's homes will become more important issues in terms of ensuring accessible housing. Policy and guidance needs to reflect this, perhaps by embracing the concept of 'Lifetime Neighbourhoods' introduced in CLG's Strategy for Housing in an Ageing Society (see Section 2).

Whilst not picked up in the research findings, there is the need for policies and guidance relating to LTH and wheelchair accessible to more fully acknowledge and address potential competing policy messages. These include transport (e.g. encouraging car free developments and restricted car parking) and sustainability. The most immediate way of addressing this issue is in the Mayor's proposed Housing Design Guide (in preparation), Sustainable Design and Construction SPG (currently under review) and Accessible London: achieving and inclusive environment SPG (due to be reviewed).

Section 2 sets out the differences between the original London Plan Policy 3A.4 (2004) and Policy 3A.5 in the 'consolidated Plan (2008). These changes were relatively minor. In the longer term, it would be sensible to undertake a more fundamental review of the policy (reflecting the wider context at the time the review is undertaken) to be clearer that the three strands of dwelling mix, size and accessible housing all have to be complied with across all tenures.

There is also a potential role for access groups and community access monitors to help develop useful and effective policy and guidance. Such groups and people are often technically literate disabled people with an interest in the delivery of inclusive design. They can also serve a useful purpose in the realisation of individual rights under Part II of the Disability Discrimination Act and the implementation of public authorities' Disability Equality Duty.

> Policy + Guidance 1. The Mayor of London should use his new planning powers to scrutinise boroughs' Local Development Schemes to ensure that the scope of proposed DPDs and SPDs satisfactorily address LTH and wheelchair accessible housing.

> Policy +Guidance 2. The Mayor of London should continue to use his scrutiny of emerging DPDs and SPDs to ensure that boroughs bring forward policies and guidance which is in general conformity with London Plan Policy 3A.5 and the Mayor's SPG that supports it. In doing so, the Mayor should focus on ensuring that policy and guidance documents are aligned with his own, without seeking to prevent

innovation. There is a particular need to scrutinise the way in which wheelchair accessible housing policies and guidance is framed.

Policy + Guidance 3 (see Implementation 10). The Mayor should update his SPG Accessible London: achieving and inclusive environment so that it continues to provide a baseline, with individual boroughs being able to go beyond it (develop better practice) on the basis of verifiable local intelligence.

Policy + Guidance 4 (See Implementation 8). The Mayor's Housing Design Guide should stress the need to see accessible housing as an integral part of high quality design and emphasise the importance of going beyond the 16 LTH criteria. In doing so, it should provide clear guidance in relation to the inclusion, location and design of car parking.

Policy + Guidance 5. In preparing and reviewing planning guidance, the Mayor should take the opportunity to reconcile potentially competing policy messages relating to transport and sustainability.

Policy + Guidance 6. In the longer term, the Mayor should consider the need to review London Plan Policy 3A.5 to make clearer that the three strands of dwelling mix, size and accessible housing all have to be complied with across all tenures.

Policy + Guidance 7. Encourage the use of access groups and community access monitors to help officers prepare useful and effective policy and guidance, so that disabled people are involved in preparing documents.

Monitoring

Internet Search of Annual Monitoring Reports - Key Findings. Full details of the Annual Monitoring Report (AMR) audit, by borough, is set out in Appendix A4. The majority of London Boroughs (21) do not currently include the monitoring of LTH or wheelchair accessible homes within their AMRs and no detail of existing policy or proposed future monitoring is included within them.

Seven boroughs do include reference to LTH and/ or wheelchair accessible homes policies and the requirements of these policies as an indicator but do not currently monitor the implementation of these polices.

Of these seven boroughs:
- three include reference to both LTH and wheelchair accessible homes;
- three include reference to wheelchair accessible homes only;
- one includes reference to LTH only; and
- All these boroughs generally envisage the inclusion of such monitoring within their future AMRs.

Only four boroughs currently monitor the implementation of wheelchair accessible homes, and of these, two boroughs currently also monitor the implementation of LTH policy.

The findings of the monitoring reports vary significantly across these boroughs with between 42% and 87% of the wheelchair accessible housing policy requirement being met and 52% and 75% of the LTH Homes policy requirements being met.

Given the lack of meaningful information from the boroughs, it should be noted, that the Mayor of London is not currently able to monitor the implementation of London Plan Policy 3A.5 in his London Plan AMR.

As outlined above, the policy requirements for each borough differ, as do the method of measuring the output of the policy and therefore it is currently difficult to accurately compare the implementation of these policies.

The policy requirements, for both LTH and wheelchair accessible housing, differ significantly across boroughs. The 'trigger' for the inclusion of LTH or particularly wheelchair accessible homes within a development is generally a certain number of units or size of site, and this varies across boroughs. The percentage of each type of home required also varies from borough to borough.

The method of measuring the implementation of policy also varies across borough with some measuring the number of planning applications permitted and others measuring the inclusion of LTH and wheelchair accessible homes through the housing completions within the boroughs.

The Questionnaire – Key Findings. The answers to the four questions relating to monitoring are set out in Appendix A5.

Code for Sustainable Homes Monitoring. As outlined in Section 2, LTH standards are now a mandatory element at Code level 6 and will be mandatory at Code level 4 from 2010 Code level 3 in 2013.
DCLG has published a Code for Sustainable Homes: Technical Guide[xxviii] which sets out how new homes are to be assessed in relation to the Code. Assessment is in two stages. Stage 1 is at Design Stage, leading to an Interim Certificate. Stage 2 is at Post Construction Stage, leading to a Final certificate. The aim of the Post Construction Stage is to assess each individual dwelling as built to determine the final score for the dwelling and its Code level. For the LTH element (see Page 220 of the Guide), assessors are required to:

- Confirm that an As Built Lifetime Homes checklist (signed by the developer) has been completed.; and
- Verify that the Lifetimes Homes criteria have been met, either by a site inspection or as built drawings showing the features.

So, whilst a site visit is not mandatory, a mechanism is in place for checking that what is permitted is actually built. However, there is the need to ensure that Code Assessors have the necessary training to ensure that the delivery of LTH standard housing is effectively monitored. Furthermore, as outlined in Section 2, LTH is not mandatory for all levels of the Code for Sustainable Homes until 2013 and, in any event, the Code for Sustainable Homes is not in itself mandatory. There is still the need, therefore, for the boroughs to carry out some compliance checking.

Recording and using information to help improve choice. In addition to monitoring the overall provision of new homes built to LTH /wheelchair accessible standards, there is also the issue of recording which individual new homes are built to these standards and providing information to prospective occupiers (both tenants and owners), so that they can take this into account in their search for somewhere to live.

Over time, with the implementation of policy, more and more homes in London will meet LTH/wheelchair accessible standards or (in the latter's case) be easily adaptable. However, for the foreseeable future it will be the exception rather than the rule and there is a pressing need to increase housing choice for disabled Londoners and ensure that accessible and adapted properties are let to disabled people who need them.

Affordable housing and the Accessible Housing Register. As outlined in Section 2, the Mayor's draft Housing Strategy published in 2007 under the previous administration, (Policy Statement 3.1), asked social landlords to participate fully in Capital Moves. This is the pan London choice based lettings and mobility (CBLM) scheme which incorporates the London Accessible Housing Register (AHR), which is to be rolled out across London during 2009.

Many social landlords do not hold comprehensive information about the accessibility of their homes and as a result many accessible and adapted homes are not used most effectively for people who need them. To be delivered primarily by social landlords, the objectives of the Accessible Housing Register (AHR) are to increase housing choice for disabled Londoners and to ensure that accessible and adapted homes are let to disabled people who need them[xxix]. A toolkit has been developed to help social landlords categorise accessible housing[xxx]. The intention is that once the AHR is established for the social sector, it is rolled out to the private rented and housing for sale sectors.

Delivered primarily by social landlords, the AHR will:

- Provide consistent and comprehensive information about vacant accessible homes at borough, sub regional and regional level;
- Provide information in a consistent format about all aspects of accessibility, e.g. that a property is wheelchair accessible, has no steps or stairs, has a lift, or is located close to shops, transport and community facilities;
- Provide high quality standardised information about the needs of disabled Londoners who require accessible homes at borough, sub regional and regional level;
- Provide an eligibility framework to assess disabled people for accessible homes;
- Promote and signpost support, advice and advocacy for disabled home seekers, and;
- Provide effective channels for advertising and marketing accessible housing options across all tenures[xxxi].

The London Borough of Tower Hamlets has been at the forefront of trying to collect and make available details about the accessibility of social housing. The AHR is currently being piloted by the Borough, which is working with

Registered Social Landlords (RSLs) active in its area to survey all properties with one or more lifts. In doing so it is using a Toolkit[xxxii] which establishes the following property categories:

A – Wheelchair accessible;
B – Partially wheelchair accessible;
C – Lifetime Homes;
D – Easy access; and
E – Step free.

In terms of new properties, the responsibility falls on the RSL to place new homes in one of the above categories and to update their records accordingly. Tower Hamlets has been working with its partner RSLs to use new technology (digital pens) to make this process as accurate and efficient as possible.

Market Housing. In the longer term, the aim is to roll out the AHR to cover private homes to rent or buy. There are a number of organisations[xxxiii] that provide information to those wishing to rent or buy an accessible home, although information on the accessibility of homes is more general and not based on specific property categories.

The requirement for sellers of homes in England and Wales to prepare a Home Information Pack (HIP) (introduced in December 2007) does not explicitly cover accessibility criteria. Having said this, from 1 May 2008, a Code for Sustainable Homes certificate or nil rated certificate (where an assessment has not taken place) has to be included in a HIP fro new homes.[xxxiv] The certificate will refer to LTH compliance, so will help those potential buyers who are conversant with the standard. However, things are different in Scotland, where the Home Report that will be required by those marketing properties from December 2008[xxxv] includes the need for an accessibility audit, which will require sellers to confirm the following:

1. Which floor(s) is the living accommodation on?
2. Are there three steps or fewer to a main entrance door of the property?
3. Is there a lift to the main entrance door of the property?
4. Are all door openings greater than 750mm?
5. Is there a toilet on the same level as the living room and kitchen?
6. Is there a toilet on the same level as a bedroom?
7. Are all rooms on the same level with no integral steps or stairs?
8. Is there unrestricted parking within 25 metres of an entrance door to the building?

This is an interesting development which may provide lessons for England and Wales, although the usefulness of the Home Report is likely to be limited by the lack of a requirement to include this information into property particulars and marketing information. As things stand, prospective purchasers will only receive the Home Report when they make an offer, by which time they would have probably visited the property and established its accessibility for themselves.

It is common for boroughs to include an informative on planning decision notices reminding developers of the need to apply for naming and numbering of individual units. In Islington, the naming and numbering application form requires developers to identify which units are fully wheelchair-accessible. The information is then gathered and collated within a data base that is available to the GLA and Council Housing Allocations Officers. On the basis of this local data bank, developers have been persuaded to provide fewer but larger wheelchair accessible dwellings to meet established needs.

Conclusions and Recommendations

Only a small number of boroughs have been monitoring the delivery of LTH and/ or wheelchair accessible homes up to now, although a number include LTH and/ or wheelchair accessible homes as indicators but are not yet monitoring their implementation. Only four boroughs stated that they had checked compliance on site and this was in response to specific complaints.

The introduction of the requirement to submit Design and Access Statements for most applications does not appear to have improved the monitoring of London Plan Policy 3A.5.

However, the study was carried out at a time when the GLA was seeking agreement from at least 66% of the boroughs (22 boroughs) in order to require all boroughs to provide information on the delivery of LTH and wheelchair accessible homes in their returns for the London Development Database (LDD). This agreement has since been secured and boroughs are now obliged to provide information on the number of LTH/wheelchair accessible homes that are both permitted and built; adding information on permitted and completed schemes directly onto the LDD.

Now that boroughs are obliged to provide information on the number of LTH and wheelchair accessible homes that have been permitted/built, it is understood that the GLA intend to include information on this in its London Plan Annual Monitoring Report. The need to keep Key Performance Indicators to the minimum necessary and concentrate on doing a good job of monitoring a manageable number of Indicators is understood. However, GLA officers should consider the desirability of strengthening the monitoring framework by including a specific Performance Indicator on this topic.

A standardised method of monitoring both types of housing would allow more meaningful comparisons of implementation across the boroughs and Monitoring Recommendation 5 proposes the bones of a good practice note.

As outlined under Policy and Guidance above, requirements for LTH and particularly wheelchair accessible homes differ significantly across boroughs. This is likely to decrease as DPDs and SPDs are brought forward under the scrutiny of the Mayor of London and more comparable monitoring across boroughs should be possible in the future.

The assessment regime for the Code of Sustainable Homes introduces a fairly good degree of compliance checking for those developments where a certificate is sought for Level 6 and above at present (to include Level 3 by 2013). Whilst not ideal, pressure on planning officers working in the boroughs is intense and unlikely to ease in the foreseeable future and they cannot be expected to carry out systematic checks on site. Building Control officers and Approved Inspectors are unlikely to systematically check either, because compliance with LTH is not currently a statutory requirement. However, borough Development Control officers should be encouraged to undertake some compliance checking and it may be possible to refer to Sustainable Code assessment sheets.

The AHR should provide an important source of information on accessible housing in the social rented sector. However, the project team has some concerns that the five categories of housing included in the pilot may lead to some confusion (in terms of terminology) and capacity issues in terms of the work load of people that are charged with incorporating details into the Register. However, the GLA is planning a comprehensive training programme on the AHR with all social landlords in London which should help ensure that they have the necessary skills to assess properties.

Monitoring 1. The GLA should use the information provided by the boroughs by ensuring that the London Plan Annual Monitoring Report 5 and subsequent Reports includes a brief section on the delivery of LTH and wheelchair accessible homes.

Monitoring 2. In the longer term, the GLA should consider the desirability of including an additional Performance Indicator on the delivery of LTH standard and wheelchair accessible homes, possibly as part of monitoring progress towards achieving London Plan Objective 4; to promote social inclusion and tackle deprivation and discrimination.

Monitoring 3. The Mayor of London should continue to use his scrutiny of emerging DPDs and SPDs to ensure that boroughs include in these documents satisfactory and consistent arrangements for monitoring the provision of LTH standard and wheelchair accessible homes.

Monitoring 4. To help boroughs monitor the delivery of LTH and wheelchair accessible homes, the GLA should amend the Mayor of London's 'Access statement content guidance[xxxvi] to make it explicit that Statements should include a schedule setting out the number and location of homes that are proposed to meet (a) LTH standard (b) wheelchair accessible homes standard and (c) be easily adaptable to be wheelchair accessible homes.

Monitoring 5. To help boroughs monitor the delivery of LTH and wheelchair accessible homes in a consistent way, the GLA should quickly prepare a short 'best practice' guidance note. This note should highlight the importance of:
- Providing guidance on information required in Design and Access Statements (including a schedule of the number and location of proposed LTH and wheelchair accessible homes) in their 'local list' of requirements of necessary information to enable the validation of applications[xxxvii]
- Ensuring that the schedule set out in the Design + Access Statement is updated to reflect the approved position and that this information is used to feed into the London Development Database;
- Capturing the approved position on the face of the decision notice (either in the description of development, condition or informative) as this is the document most likely to be referred to by agencies and individuals looking to establish how many and which homes are built to LTH and wheelchair accessible standards;

- Assuming that, upon completion, the planning permission has been implemented in accordance with the approved drawings and conditions (responding to specific complaints and carrying out some 'spot checks' on completion); and
- Establishing a system with the borough's Naming and Numbering Team (triggered by including an informative on the decision notice) to record which homes are assumed to be built to LTH and wheelchair accessible standards[xxxviii] and publicise the availability of this information.

Monitoring 6. Liaise with the Department of Communities and Local Government and (via the AHR project) RSLs to ensure that Code for Sustainable Homes Assessors and housing officers receive the necessary training to ensure the effective monitoring of the delivery of LTH.

Monitoring 7. In order to provide some level of risk of detection, the GLA should encourage borough Development Control officers to undertake some 'spot checks' of completed properties with (where available) the direct intervention of arms length support of an access officer.

Implementation

Introduction

This sets out the results of a survey of all boroughs on the implementation of LTH policy and guidance. It also sets out the findings of a review of a small sample of permitted and built schemes and of discussions with a number of architectural practices and developers who are helping to deliver new homes in London.

Methodology

Research for this section included the following:

Borough Questionnaire

As outlined in Section 3, a questionnaire, set out in Appendix A1, was sent to the 'Head of Planning' and policy and Development Control managers. It was copied to borough Access Officers. Questions 1-10 relate to the implementation of policies and guidance relating to LTH and wheelchair accessible housing. A total of 22 boroughs had responded; a response rate of about 66%.

Discussions with Architects

This strand of the research involved a series of facilitated informal and frank discussions based around a set of common questions with architects in six architectural practices (two more than set out in Savills' proposal agreed by the GLA). The companies were chosen for their expertise in and knowledge of helping to deliver LTH in London. Together, they represent a range of experience from large and smaller architectural practices working for both public and private sector clients. The six practices are as follows:

• Allies + Morrison • Hawkins Brown • John Thompson and Partners	• Levitt Bernstein • MAE • PRP

Discussions with Developers

Following discussion with the Steering Group, it was agreed to discuss issues with developers (although this was outside the scope of Savills' proposal agreed by the GLA). Countryside Properties PLC was recommended by the Steering Group and Goldcrest Homes and Ballymore were chosen by Savills as representatives of the development industry.

Review of Permitted Schemes

A total of 15 permitted schemes were reviewed to assess how LTH policy was being interpreted and addressed as part of the planning application process. This included reviewing selected pieces of the application documentation (Application form, Design and Access Statement where submitted and approved drawings), together with the Committee Report, Decision Notice and s.106 Agreement.

The following criteria for identifying permitted schemes to review were agreed by the Steering Group:
• New build only;
• Planning applications submitted after December 2004 (so as to allow six months from when the LTH requirement was first included as a London Plan policy);
• Full and outline applications both acceptable;
• Threshold to be 10 or more homes (the current definition of 'major' application); and
• Aim to review a variety of schemes in terms of different boroughs, different political administrations, Central/Urban/Suburban setting and size.

Review of Built Schemes

Three of the permitted schemes that were reviewed that had been built were visited to learn lessons from development on the ground.

Questionnaire – Key Findings

The answers to the 10 questions relating to implementation of the LTH policy are set out in Appendix A5.

Discussions with architectural practices

A summary of the discussions with representatives of the six architectural practices is set out in Appendix A6. A response to the issues raised in these discussions is included in Conclusions and Recommendations below.

Discussions with Developers

All of the developers accept the need for proposed housing in London to meet LTH standards because of the London Plan policy requirement, although a number of the larger LTH schemes are generally at fairly early stages in the development process and not yet built. This is not necessarily the case for parts of the UK outside London.

All of the developers considered that it would be more appropriate to secure LTH standard homes via Building Regulations rather than Planning; with Part M extended to cover the LTH standards not currently required and compliance checking and monitoring carried out via the Building Control process. It was generally accepted that LTH could remain as a planning policy, although one of the developers called for it to be applied more flexibly to take account of other competing policy priorities, but that the planning application stage is too early in the development process to consider all the necessary detail. There was also a concern that many planners lacked the necessary skills and time

to properly engage with the LTH concept and that it had become somewhat of a box ticking exercise.

Developers generally wish to establish the principle of development at the planning stage and proposals are often not worked up in sufficient detail to address all of the 16 LTH criteria with, for example, services and detailed flat layouts not fully resolved at this stage. The current approach expects a high level of design work (and cost) at risk, before the principle of development is established.

All of the developers that were interviewed were aware of the JRF guidance ('Meeting Part M and Lifetime Homes) and quoted this as their source document, with some appreciation of other advice prepared by Habinteg Housing Association. None highlighted any other guidance as being particularly helpful, although one referred to the carrying out of policy audits to identify any relevant borough SPG/SPD that needs to be taken account of. One company is also working towards achieving standard designs which incorporate LTH in the most suitable manner for the company, so that there is consistency across all subsidiaries.

Some concern was expressed at the implications LTH has for room sizes, with greater space being required for circulation, and the constraint that provision for a possible future ceiling hoist and level entry shower has on service provision. There was also some concern at the lack of clarity of some of the criteria (space in front of a WC being referred to).

Access officers were generally considered helpful, although some concern was expressed about detailed advice being provided late on the application process.

Review of Permitted Schemes

The Reviewed Schemes

Taking account of the criteria set out under Methodology above, the following permitted schemes have been reviewed:

Borough	Address	Summary Description
Barnet	Zenith House, Edgeware Road, NW9	Two-11 storey, 215 mixed tenure flats.
Hackney	Adelaide Wharf (118-120 Queensbridge Road, E2.	Three-six storey, 147 mixed tenure flats.
Havering	Land at Marks Lodge, Cottons Approach, Romford, RM1.	Two-four storey, 99 mixed tenure flats.
Havering	Boundary Works, Moss Lane, Romford, RM1	Two storey houses and two storey maisonettes, eight flats for sale.
Islington	122-128 Pentonville Road, N1.	Four-six storey, 30 mixed tenure flats.
Islington	431-433 Hornsey Road, N19.	Four-storey, 15 mixed tenure flats.
Islington	1 Gifford Street, N1.	Four-six storey, 154 mixed tenure flats.
Lambeth	53-59 and 63 Old Town, SW4.	Two-six storey, including retention of façade, 170 mixed tenure flats
Lambeth	Stockwell Park and Robsart Village Estates	Phased redevelopment and refurbishment of the Estates, resulting in the refurbishment of 491 existing homes and the provision of 550 new homes
Southwark	Bankside Industrial Estate, 118-122 Southwark Street, SE1.	Six-24 storey, 229 mixed tenure flats.
Southwark	Sites E, F, H, S + U Bermondsey Spa, Jamaica Road, SE16.	Outline permission, three-10 storey, 605 mixed tenure flats.
Southwark	Castle Industrial Estate.	
Tower Hamlets	1 Millharbour, E14	39 and 48 storey towers, 763 mixed tenure flats.

Waltham Forest	129 Poppleton Road, E11.	Two storey building comprising 5x 2-bed and 4x 1-bed flats.
Waltham Forest	554-558 Forest Road, E17.	Five storey building comprising 47 mixed tenure flats.

The details of the reviewed permitted schemes are set out in Appendix A7.

Key messages from the Reviewed Schemes

BARNET
- Not clear from drawings or Design and Access Statement whether a reasonable route is provided for a possible hoist
- The Design and Access Statement asserts that a number of criteria 'should be possible' without demonstrating that it is in fact the case.

HACKNEY
- Requires a number of non-compliance issues, including location of potential floor lifts, to be submitted to and approved by the LPA before works commence
- Not clear from drawings whether entrances are covered or lit or that switches and sockets are set between 450-1200mm from the floor.

HAVERING
- A condition included on one of the schemes requiring details of external access ramps to be submitted to and approved by the LPA
- It is not clear from drawings in either scheme whether entrances are covered or lit
- The bathroom on one of the schemes is too small for wheelchair access - although this could be replaced with a level floor shower
- There is no 300mm clear space on leading edge of the entrance door or other doors in one of the schemes

LAMBETH
- No discussion on LTH issues in either of the committee reports
- No relevant conditions or obligations for the detailed application scheme, although the audit suggests that the flats would comply with all the LTH criteria
- The Planning and Design and Access Statements for the outline scheme include floorspace assumptions for the proposed flats and a commitment to ensure that all flats will be to LTH standards

- LTH flats required by condition and planning obligation (Social Rented only) for the outline scheme

SOUTHWARK
- Good discussion in the committee reports on the issue
- Requires details of access to and movement around buildings for ambulant disabled people for one scheme to be submitted to and approved by the LPA before flats are occupied
- Condition requiring all homes to meet LTH standards attached to the outline permission, although it is not clear what size the flats would be
- Not clear from drawings for one of the schemes whether entrances are covered or lit
- Internal corridor widths not known for flats in outline planning application

ISLINGTON
- Aspects of design secured by condition:
  o Level thresholds
  o Details of arrangements to install through floor lifts to be submitted for approval.
- The reason given for LTH related conditions is that it 'maximises accommodation available to disabled people and in the interest of sustainable development.'
- 'Access' Informatives attached are out of date
- An informative requires developers to apply for naming and numbering of individual units (see Section 3, Recording and using information to help improve choice). This is good practice.
- Contribution secured via S106 for the provision of on street parking bays for disabled users (as and when required) and sustainable transport alternatives.
- The access officer did not comment on the application
- Despite effective local policies reference is made to London Plan policies 3A.4 and 4B.5..
- Committee reports include a section on accessibility. An assessment is made that LTH standards have 'broadly' been met but there is no evidence on plan or in the access statement that any more than 9 standards were met.
- Quality of Access Statements poor, good intentions but very little precise detail. No reference is made to wheelchair housing or Lifetime Homes' policies, standards or guidelines.

- Good practice gains obtained via negotiation re common parts but still a spiral stair is provided as a means of escape.
- A scheme that satisfactorily meets all LTH objectives and standards was also applauded for the general quality of the design and its contribution to the local area.

TOWER HAMLETS
- Full involvement of Access Officer, with comments included in committee report
- Access Statement sets out a comprehensive assessment of compliance
- Compliance of all flats to LTH standards secured by condition.

WALTHAM FOREST
- No details of LTH requirements are set out in Design and Access Statements
- Access Officer consulted on applications
- Conditions require detailed layouts of LTH and wheelchair accessible homes to be submitted to and approved by the borough before work starts

Design and Access Statements often assert that the scheme complies with LTH standards without demonstrating compliance. Furthermore, it is not always clear from the drawings or the Design and Access Statement whether all the criteria have been met. This makes it difficult for planning officers who are not well versed with the criteria and there often appears to be a 'willingness to be convinced'. This is particularly true for issues such as routes for hoists and location of sockets which would not otherwise need to shown on drawings at the planning application stage.

Officers are placed in a dilemma when most criteria are met by schemes, but a lack of information on or non-compliance with one or more of the criteria means that the proposed flat(s) cannot be described as a LTH. This is difficult as the developer gets no credit for what might generally be an adaptable and accessible home.

Some fundamental issues (including ramped access and the means by which "non-ambulant" disabled persons may gain access and move around the buildings) are being 'reserved' for subsequent approval by condition. However, it may not be possible to ensure such outcomes within the parameters established by permission and, therefore, such details should be known at the time that the substantive decision is taken. Clearly some authorities ask for details of how the flats are to comply with LTH standards to

be submitted to and approved, although from this small sample and the results of the questionnaire it would appear that most authorities do not.

There is a need for annotated 'indicative' or 'typical' flat layouts based on the size of flats allowed for to be included in the Design and Access Statement for proposed schemes, to demonstrate that flats to LTH standards are achievable. This is particularly true for outline applications.

There is a need to ensure that the size and layout and scale of proposed residential/mixed buildings in outline applications allow for flats of sufficient size and lift overruns etc. to enable wheelchair accessible flats or flats that are easily adaptable.

Review of Visited Schemes

The Visited Schemes

The following four schemes were visited:
- Adelaide Wharf (Hackney)
- Bermondsey Spa (Southwark)
- 1 Millharbour/Pan Peninsula (Tower Hamlets)

A summary of the key issues observed during these visits is set out in Appendix A8.

Key Messages from the Visited Schemes

The flats themselves in the Adelaide Wharf and Bermondsey Spa schemes generally comply with LTH standards. Interestingly, in both cases this was primarily due to client requirements (English Partnerships and Hyde Housing Association respectively) and the boroughs appear to have had little influence on the issue.

Whilst the flats themselves generally comply with LTH standards, the most challenging aspects of the developments in terms of accessibility were the communal parts and approaches to the flats. Adelaide Wharf included a stepped approach, which should have been picked up under the Building Regulations. However, more significantly it is areas that fall outside the 16

LTH criteria such as the location/design of bin stores, the positioning and design of entryphone systems and the design of basement car parking areas that need to be addressed. It is also interesting to note that there is a difference in standard between the affordable and market housing in terms of location and quality of external finishes. This issue has been reinforced recently by the findings of a Joseph Rowntree Foundation report investigating residents' views of new forms of high density living.[xxxix] These issues need to be addressed as part of broader design guidance, as discussed in Section 3.

Adelaide Wharf is an interesting example of the use of pre-fabricated units in its construction. It is increasingly common in London that residential developments are system built; a framework is erected on site but individual dwellings are delivered (fully fitted) from a factory (sometimes overseas). These systems present a new range of opportunities and challenges to the delivery of flexible adaptable homes. They can, for instance, deliver gravity drainage above ground level and walls are strong enough to take grab rails in virtually any location. However, the basic framework is fixed and cannot be altered without compromising its strength and stability. It is important therefore that the manufacturers are well informed, that the principles and objectives of the LTH concept are understood at the earliest stages of development.

1 Millharbour/Pan Peninsula is in many ways an untypical scheme; very tall, high density and high value flats for sale, with affordable housing being provided 'off-site' and a likelihood that many flats will not be the owners only or main home. The 40 and 50 storey towers are served by four lifts each, the building specification is very high and communal areas and services are to be managed and provided along the lines of a hotel (24 hour concierge, valet parking and refuse taken down from outside front doors by staff) with the associated relatively high service charges. The scheme raises interesting questions about the applicability of LTH standards to such developments, particularly the studio flats designed for 'yacht-living' with the dining table converting to a bed and the kitchen collapsing to be secreted behind panels.

Conclusions and Recommendations

Questionnaire

The introduction of the requirement to submit Design and Access Statements for most applications does not appear to have improved the monitoring of London Plan Policy 3A.5.

The questionnaire responses demonstrate preference for conditions (as opposed to obligations) for securing LTH and wheelchair accessible housing. This is in line with Government guidance.[xl]

One borough stressed that conditions to secure wheelchair accessible homes was not appropriate, as this may result in subsequent layout changes affecting the approved dwelling mix. This highlights the need for boroughs to be satisfied that it is possible to incorporate satisfactory LTH and (importantly) wheelchair accessible homes at the time the substantive decision is made. This is particularly important for outline applications, but is also necessary for full applications. Boroughs should be encouraged to ensure that Design and Access Statements include typical flat layouts which are annotated to demonstrate that all the LTH standards and, where appropriate, wheelchair accessible standards are capable of being satisfactorily met.

Linked to this is the use of conditions to require the subsequent submission and approval of details. This is considered to be a less than ideal use of conditions, which should only be used for detailed aspects of the LTH standard which do not affect the size or layout of the proposed homes.

The questionnaire results and review of permitted schemes (see below) illustrate the value of model conditions to assist boroughs. Islington is in the process of amending its relevant standard condition on LTH because the original condition was not being effectively enforced. The condition (set out below) could form the basis of a model condition.

(------) Lifetime Homes' units shall be constructed as shown on the approved plans and described in the associated Access Statement and Lifetime Homes' Schedule ref (--).

The design deficiencies identified in the Access Statement; (…..eg. the lack of a floor drain in the ground floor WC in units………) shall nonetheless be rectified and approved by the Planning Authority.

The detailed design of these units shall be developed in accordance with the Council's Interim Planning Guidance Note and implemented prior to the occupation of any part of the development and maintained thereafter to the satisfaction of the local planning authority.

REASON: to produce flexible, visitable and adaptable homes appropriate to diverse and changing needs.

Only eight authorities that replied have reported that they have refused permission on the grounds that LTH/wheelchair accessible homes have not been provided. It is not clear whether this was the only ground, but it is considered most likely that this was one of two or more reasons for refusal. It would be helpful to establish a database of relevant refusals and appeal decisions, as this would help officers consider whether it was reasonable to refuse permission for a particular scheme on the basis of no or insufficient accessible housing. Where schemes have been refused partially on the grounds of non-delivery of LTH, this has not always been upheld at appeal by the Planning Inspectorate and there is the potential to engage with CLG and the Inspectorate to ensure that Inspectors are fully familiar with the LTH concept and the importance of delivering accessible housing in London.

There is insufficient information to draw a conclusion on the impact that Disability Equality Schemes have had on the implementation or monitoring of London Plan Policy 3A.5.

Discussions with Architects

Discussions with representatives from the architectural practices raised a number of issues and misunderstandings that warrant a response.

There is perhaps a need to re-emphasise the principle/objective of the LTH concept; that of 'visitability' and 'adaptability'. It seems that the objective /logic may have been lost after a number of years of attempting to apply specific standards to an evolving product.

It is broadly accepted that LTH standards as defined by the JRF in 1991 should be revised to take account of the contemporary brief, at least within the urban higher density situation that exists in London (this is underway as part

of the BSI Draft for Development Code of Practice (DD266:2007). There is also a need for more evidence to be provided to developers and designers of the need, costs and regularity of subsequent adaptation works.

All the architects interviewed raised concerns at the amount of guidance that exists. It might be viewed as unhelpful that individual boroughs have sought to update and make locally relevant the outdated standards (particularly where these appear more onerous). However, this is not considered a reason for boroughs not preparing their own distinctive guidance where this is based on particular local circumstances and evidence. Where local initiatives prove successful these might be picked up regionally by the Mayor of London and /or nationally by Habinteg Housing Association and used to develop the standard. The definition of what is considered good planning has often come from local authorities seeking to extend policy and guidance.

The level of detail required is extraordinary at the planning stage, although the situation is likely to change in a few years time with the probable introduction of a Building Regulation. However, now and in the future, there are very many aspects of the internal layout of homes that have to be secured at the planning stage to ensure that Building Control staff and Approved Inspector's can do their job. This is particularly onerous for architects that are paid on a submission or 'on results' basis.

Given the national agenda for change, the GLA should take the findings of this and other research to the BSI Code of Practice drafting table. It should also reflect the latest position on agreeing a Code of Practice when revising the 'Accessible London: achieving an inclusive environment' SPG. This SPG would provide a baseline and, as outlined above, individual boroughs might still go beyond that (develop better practice) on the basis of verifiable local intelligence.

The GLA should take account of the findings of this research when drafting the proposed 'Housing Design Guide'. The GLA's work on developing these Standards and in helping to develop a national Code of Practice that is relevant to London should help ensure alignment with and re-enforcement of the sustainable development agenda (e.g. sustainable adaptable homes are best achieved if they are on one level and dual aspect and avoiding the use of pumps where possible).

It is not considered feasible for the GLA to maintain an up-to-date list of guidance prepared by individual boroughs and designers will need to continue to check borough websites for information at the beginning of a project.

However, the Disabled Persons Transport Advisory Committee (DPTAC) does maintain a Publications Access Directory which enables individuals to search for relevant guidance (http://seb.veritymedia.co.uk/search_e.asp)

A number of the concerns and obstacles identified by the architects interviewed are based on the associated guidance being less than clear to them or a misunderstanding of the standards (or both). For example:

- In a three bed multi-storey dwelling there should be an accessible WC at entrance level and the provision for future lift access to bathrooms and bedrooms on whatever floor they are located;
- A straight staircase is not required in order to be able to allow for a stair lift in the future; and
- There is no requirement in the Lifetime Homes standard itself for two or three storey blocks of flats to be served by a lift. However, without a lift homes above the ground floor are not visitable by wheelchair users and without the facility to install a lift at a later stage those homes are not adaptable either. In response to this. The LB Islington require that a lift be installed where a core serves 10 or more homes, but in all cases requires space to be provided for future fitting (as provided for in the BSI Draft for Development Code of Practice (DD266:2007) .

However, this does not diminish the importance of these comments; indeed, they serve to demonstrate the need for greater clarity. Such clarity should be brought to the following issues that were identified in the discussions:

- The need for and design of car parking;
- Floor drainage is clearly a big issue above ground level; pumped solutions should be accepted on occasion – with the need to publicise the effectiveness of specification of and installation details for pumped solutions;
- Need for guidance on the definition of 'reasonable' in the context of identifying a reasonable route for a hoist. Islington has sought to do this in its draft SPD where, part of Standard 13 states: "The design should provide for a discreet route for a potential hoist from a main bedroom to the bathroom. These are still useful and are regularly recommended by Occupational Therapists because they can facilitate a unique level of independence, do not require extra storage space and do not pose any risk to carers".

- The inclusion of dimensioned illustrations in the standards and guidance as provided for in the BSI Draft for Development Code of Practice (DD266:2007); and
- The sensible installation of 180^0 hinges on bathroom doors.

In a broader sense, the GLA could adapt its advice note on Design and Access Statements to emphasise the value and purpose of these statements to ensure the delivery of accessible homes, to highlight mechanisms for future adaptation and as a landlord reference and or sales literature. It should also work with CABE to ensure that these issues are addressed when it reviews its 2006 document – 'Design and Access Statements: How to write, read and use them.'[xli]

Review of Permitted and Visited Schemes

A key message from visiting built schemes is the importance of ensuring that the common parts of buildings and their surroundings are accessible. These generally fall outside of the 16 LTH criteria and so need to be addressed in other ways.

There is also the potential for the GLA to discuss the specification of residential units or 'pods' with manufacturers to help ensure that, where used, they help deliver LTH standard homes.

Recommendations

Implementation 1. Boroughs should be encouraged to provide guidance on information required in Design and Access Statements in their 'local list' of requirements of necessary information to enable the validation of applications. This should include the need to provide a schedule of the homes that are proposed to meet LTH standards and be wheelchair accessible (or easily adaptable) and annotated typical floor plans demonstrating that LTH standards and wheelchair accessible housing standards are achievable within the proposed building envelope.

Implementation 2.The GLA and boroughs should use the formalised pre-application advice procedures that have been established to stress the need to comply with policy and guidance relating to LTH standard homes.

Implementation 3. To support borough planning officers, the GLA should work with LondonCouncils to establish a London database of decisions where planning applications have been refused permission on the grounds that there was no or insufficient provision of homes to LTH and wheelchair accessible standards and publicise its existence to the boroughs. This should include appeal decisions.

Implementation 4. To help bolster the defence of Policy 3A.5 at appeal, the GLA should engage with CLG and the Planning Inspectorate to ensure that Inspectors are fully familiar with the LTH concept and the importance of delivering accessible housing in London.

Implementation 5. The GLA should establish in a best practice guide model conditions and reasons and obligations to help boroughs use these tools appropriately and effectively.

Implementation 6. Habinteg Housing Association should be encouraged to re-emphasise the principle objective of the LTH concept; that of 'visitability' and 'adaptability'. It should also be encouraged to develop the LTH concept to better reflect the urban higher density situation that exists in London (taking account of the BSI Draft for Development Code of Practice) and to provide the evidence in a clearer way to developers and designers of the need, costs and regularity of subsequent adaptation works. It should also review its LTH documentation in order to:

- Clarify the need for and design of car parking;
- Address floor drainage issues, including the acceptability, effectiveness and specification/installation details for pumped solutions;
- Define 'reasonable' in the context of identifying a reasonable route for a ceiling track hoist;
- Include dimensioned illustrations; and
- Emphasise the benefits of 180^0 hinges on bathroom doors.

Implementation 7. To help ensure that the proposed BSI Code of Practice is relevant and appropriate for London, the GLA should take account of the findings of this and other studies when inputting into the drafting of this document.

Implementation 8. The GLA's review of the 'Accessible London: achieving an inclusive environment' SPG should reflect the latest position on agreeing a Code of Practice, continue to provide a baseline which individual boroughs

might still go beyond and develop better practice on the basis of verifiable local intelligence. It should also clarify what information relating to LTHs should be included in planning applications and supporting documents and what information can wait to the Building Regulations stage.

Implementation 9. The GLA should take account of the findings of this research when drafting the proposed 'Housing Design Guide'.

Implementation 10 (see also Monitoring 4). The GLA should adapt its advice note on Design and Access Statements to emphasise the value and purpose of these statements to ensure the delivery of accessible homes, to highlight mechanisms for future adaptation and their potential use by RSLs in informing the AHR and by developers/estate agents in drafting sales literature. It should also work with CABE to ensure that these issues are addressed when it reviews its 2006 document – 'Design and Access Statements: How to write, read and use them.'

Implementation 11. The GLA should hold discussions with manufacturers about the specification of pre-fabricated housing units to help ensure that, where used, they help deliver LTH standard homes.

Implementation 12. The GLA should work with Design for London, Urban Design London, CABE, the Academy for Sustainable Communities and others to identify and deliver appropriate training for public sector planners working in London to help officers deliver good LTH standard housing.

Overall conclusions and recommendations

Introduction

This section sets out all the key conclusions and recommendations for improving the delivery and monitoring of LTH standard housing in London.

Policy, Guidance and Monitoring Conclusions

The majority of boroughs (22 or 66%) either do not have a LTH policy in their UDP or have a policy which has expired. Slightly fewer (20 or 64%) of boroughs have no extended UDP policies relating specifically to wheelchair accessible housing. In these cases London Plan Policy 3A.5 provides the only development plan policy that requires LTH and wheelchair accessible housing.

Extended UDP policies for LTH and wheelchair accessible housing vary in the way they are framed and provide varying degrees of exhortation and flexibility. This is particularly true for wheelchair accessible housing, where a number of boroughs have differing thresholds for triggering the requirement to incorporate wheelchair accessible housing.

Just over half (55%) of boroughs have SPG relating to LTH, although the level of detailed guidance is generally not that great

As LTH standards become embedded in the Code for Sustainable Homes, communal areas/facilities and the approaches to people's homes will become more important issues in terms of ensuring accessible housing.

In the longer term, it would be sensible to undertake a more fundamental review of London Plan Policy 3A.5 (reflecting the context of the time) to be clearer that the three strands of dwelling mix, size and accessible housing all have to be complied with across all tenures.

There is a potential role for access groups and community access monitors to help develop useful and effective policy and guidance.

Only a small number of boroughs have been monitoring the delivery of LTH and/ or wheelchair accessible homes - although they are now required to include information in their returns for the London Development Database and the GLA intend to include information from the LDD in its London Plan Annual Monitoring Report.

A standardised method of monitoring both types of housing would allow more meaningful comparisons of implementation across the boroughs and a good practice note would help boroughs with their new requirement to monitor

Only four boroughs stated that they had checked compliance on site and this was in response to specific complaints.

The introduction of the requirement to submit Design and Access Statements for most applications does not appear to have improved the monitoring of London Plan Policy 3A.5;

The assessment regime for the Code of Sustainable Homes introduces a fairly good degree of compliance checking for those developments where a certificate is sought for Level 6 and above at present (to include Level 3 by 2013).

The Accessible Housing Register should provide an important source of information on accessible housing in the social rented sector.

In many ways the key tests for monitoring the effectiveness of policy and guidance that require LTH standards is to ascertain whether it has made a difference in terms of the need to and costs of adapting homes and a reduction in the number of times people have to move home to ensure appropriate accommodation.

Policy, Guidance and Monitoring Recommendations

> Policy + Guidance 1. The Mayor of London should use his new planning powers to scrutinise boroughs' Local Development Schemes to ensure that the scope of proposed DPDs and SPDs satisfactorily address LTH and wheelchair accessible housing.

Policy +Guidance 2. The Mayor of London should continue to use his scrutiny of emerging DPDs and SPDs to ensure that boroughs bring forward policies and guidance which is in general conformity with London Plan Policy 3A.5 and the Mayor's SPG that supports it. In doing so, the Mayor should focus on ensuring that policy and guidance documents are aligned with his own, without seeking to prevent innovation. There is a particular need to scrutinise the way in which wheelchair accessible housing policies and guidance is framed.

Policy + Guidance 3 (see Implementation 10). The Mayor should update his SPG Accessible London: achieving and inclusive environment so that it continues to provide a baseline, with individual boroughs being able to go beyond it (develop better practice) on the basis of verifiable local intelligence.

Policy + Guidance 4 (See Implementation 8). The Mayor's Housing Design Guide should stress the need to see accessible housing as an integral part of high quality design and emphasise the importance of going beyond the 16 LTH criteria. In doing so, it should provide clear guidance in relation to the inclusion, location and design of car parking.

Policy + Guidance 5. In preparing and reviewing planning guidance, the Mayor should take the opportunity to reconcile potentially competing policy messages relating to transport and sustainability.

Policy + Guidance 6. In the longer term, the Mayor should consider the need to review London Plan Policy 3A.5 to make clearer that the three strands of dwelling mix, size and accessible housing all have to be complied with across all tenures.

Policy + Guidance 7. Encourage the use of access groups and community access monitors to help officers prepare useful and effective policy and guidance, so that disabled people are involved in preparing documents.

Monitoring 1. The GLA should use the information provided by the boroughs by ensuring that the London Plan Annual Monitoring Report 5 and subsequent Reports includes a brief section on the delivery of LTH and wheelchair accessible homes.

Monitoring 2. In the longer term, the GLA should consider the desirability of including an additional Performance Indicator on the

delivery of LTH standard and wheelchair accessible homes, possibly as part of monitoring progress towards achieving London Plan Objective 4; to promote social inclusion and tackle deprivation and discrimination.

Monitoring 3. The Mayor of London should continue to use his scrutiny of emerging DPDs and SPDs to ensure that boroughs include in these documents satisfactory and consistent arrangements for monitoring the provision of LTH standard and wheelchair accessible homes.

Monitoring 4. To help boroughs monitor the delivery of LTH and wheelchair accessible homes, the GLA should amend the Mayor of London's 'Access statement content guidance[xlii] to make it explicit that Statements should include a schedule setting out the number and location of homes that are proposed to meet (a) LTH standard (b) wheelchair accessible homes standard and (c) be easily adaptable to be wheelchair accessible homes.

Monitoring 5. To help boroughs monitor the delivery of LTH and wheelchair accessible homes in a consistent way, the GLA should quickly prepare a short 'best practice' guidance note. This note should highlight the importance of:
- Providing guidance on information required in Design and Access Statements (including a schedule of the number and location of proposed LTH and wheelchair accessible homes) in their 'local list' of requirements of necessary information to enable the validation of applications[xliii]
- Ensuring that the schedule set out in the Design + Access Statement is updated to reflect the approved position and that this information is used to feed into the London Development Database;
- Capturing the approved position on the face of the decision notice (either in the description of development, condition or informative) as this is the document most likely to be referred to by agencies and individuals looking to establish how many and which homes are built to LTH and wheelchair accessible standards;
- Assuming that, upon completion, the planning permission has been implemented in accordance with the approved drawings and conditions (responding to specific complaints and carrying out some 'spot checks' on completion); and
- Establishing a system with the borough's Naming and Numbering Team (triggered by including an informative on the decision notice) to record which homes are assumed to be built to LTH and

wheelchair accessible standards[xliv] and publicise the availability of this information.

Monitoring 6. Liaise with the Department of Communities and Local Government and (via the AHR project) RSLs to ensure that Code for Sustainable Homes Assessors and housing officers receive the necessary training to ensure the effective monitoring of the delivery of LTH.

Monitoring 7. In order to provide some level of risk of detection, the GLA should encourage borough Development Control officers to undertake some 'spot checks' of completed properties with (where available) the direct intervention of arms length support of an access officer.

Implementation Conclusions

Boroughs tend to use planning conditions (as opposed to obligations) for securing LTH and wheelchair accessible housing;

The importance of boroughs being satisfied that it is possible to incorporate satisfactory LTH and (importantly) wheelchair accessible homes in a scheme at the time the substantive decision is made. This is particularly important for outline applications;

Planning conditions that require approval of detailed aspects of the LTH standard should only be used for elements which do not affect the size or layout of the proposed homes. Model planning conditions would assist boroughs;

There is insufficient information to draw a conclusion on the impact that Disability Equality Schemes have had on the implementation or monitoring of London Plan Policy 3A.5;

Discussions with representatives from the architectural practices raised a number of issues and misunderstandings that are responded to in detail in the report. The main conclusions drawn from the issues raised can be summarised as follows:

- The need to re-emphasise the principle/objective of the LTH concept; that of 'visitability' and 'adaptability';
- The need for the evidence to be provided more clearly to developers and designers of the need, costs and regularity of subsequent adaptation works.
- Concern at the amount of guidance that exists and the need to clarify certain aspects of the standards (set out in detail in Section 4);
- The level of detail required at planning application stage is particularly onerous for practices that are paid on a submission or 'on results' basis;
- A revised Mayor's SPG on inclusive environments should continue to provide a baseline which allows individual boroughs to go beyond on the basis of verifiable local intelligence.
- The GLA should take account of the findings of this research when drafting the proposed 'Housing Design Guide' .
- The LTH concept needs to be aligned with and re-enforce the sustainable development agenda (e.g. sustainable adaptable homes are best achieved if they are dual aspect and avoid the use of pumps where possible).
- There is a need to clarify certain aspects of guidance
- There are misunderstandings and a lack of clarity in the existing guidance.

The developers who were interviewed all accepted the need for proposed housing in London to meet LTH standards, although they considered that it would be more appropriate in the future to secure LTH standard homes via Building Regulations rather than Planning. This was because the planning application stage was considered too early in the development process to consider all the necessary detail and many planners lacked the necessary skills and time to properly engage with the LTH concept.

Some concern was expressed by developers at the implications LTH has for room sizes, with greater space being required for circulation, and the constraint that provision for a possible future ceiling hoist and level entry shower has on service provision. There was also some concern at the lack of clarity of some of the criteria (space in front of a WC being referred to).

Both architects and developers generally considered Access Officers to be helpful.

A key message from visiting built schemes is the importance of ensuring that the common parts of buildings and their surroundings are accessible. These generally fall outside of the 16 LTH criteria and so need to be addressed in other ways.

Implementation Recommendations

Implementation 1. Boroughs should be encouraged to provide guidance on information required in Design and Access Statements in their 'local list' of requirements of necessary information to enable the validation of applications. This should include the need to provide a schedule of the homes that are proposed to meet LTH standards and be wheelchair accessible (or easily adaptable) and annotated typical floor plans demonstrating that LTH standards and wheelchair accessible housing standards are achievable within the proposed building envelope.

Implementation 2.The GLA and boroughs should use the formalised pre-application advice procedures that have been established to stress the need to comply with policy and guidance relating to LTH standard homes.

Implementation 3. To support borough planning officers, the GLA should work with London Councils to establish a London database of decisions where planning applications have been refused permission on the grounds that there was no or insufficient provision of homes to LTH and wheelchair accessible standards and publicise its existence to the boroughs. This should include appeal decisions.

Implementation 4. To help bolster the defence of Policy 3A.5 at appeal, the GLA should engage with CLG and the Planning Inspectorate to ensure that Inspectors are fully familiar with the LTH concept and the importance of delivering accessible housing in London.

Implementation 5. The GLA should establish in a best practice guide model conditions and reasons and obligations to help boroughs use these tools appropriately and effectively.

Implementation 6. Habinteg Housing Association should be encouraged to re-emphasise the principle objective of the LTH concept;

that of 'visitability' and 'adaptability'. It should also be encouraged to develop the LTH concept to better reflect the urban higher density situation that exists in London (taking account of the BSI Draft for Development Code of Practice) and to provide the evidence in a clearer way to developers and designers of the need, costs and regularity of subsequent adaptation works. It should also review its LTH documentation in order to:

- Clarify the need for and design of car parking;
- Address floor drainage issues, including the acceptability, effectiveness and specification/installation details for pumped solutions;
- Define 'reasonable' in the context of identifying a reasonable route for a ceiling track hoist;
- Include dimensioned illustrations; and
- Emphasise the benefits of 180^0 hinges on bathroom doors.

Implementation 7. To help ensure that the proposed BSI Code of Practice is relevant and appropriate for London, the GLA should take account of the findings of this and other studies when inputting into the drafting of this document.

Implementation 8. The GLA's review of the 'Accessible London: achieving an inclusive environment' SPG should reflect the latest position on agreeing a Code of Practice, continue to provide a baseline which individual boroughs might still go beyond and develop better practice on the basis of verifiable local intelligence. It should also clarify what information relating to LTHs should be included in planning applications and supporting documents and what information can wait to the Building Regulations stage.

Implementation 9. The GLA should take account of the findings of this research when drafting the proposed 'Housing Design Guide'.

Implementation 10 (see also Monitoring 4). The GLA should adapt its advice note on Design and Access Statements to emphasise the value and purpose of these statements to ensure the delivery of accessible homes, to highlight mechanisms for future adaptation and their potential use by RSLs in informing the AHR and by developers/estate agents in drafting sales literature. It should also work with CABE to ensure that these issues are addressed when it reviews its 2006

document – 'Design and Access Statements: How to write, read and use them.'

Implementation 11. The GLA should hold discussions with manufacturers about the specification of pre-fabricated housing units to help ensure that, where used, they help deliver LTH standard homes.

Implementation 12. The GLA should work with Design for London, Urban Design London, CABE, the Academy for Sustainable Communities and others to identify and deliver appropriate training for public sector planners working in London to help officers deliver good LTH standard housing

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