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Accessible Hotels in London

LONDON DEVELOPMENT AGENCY

DESIGN FOR LONDON

MAYOR OF LONDON

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Accessible Hotels in London

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Final report - March 2010

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1 Executive summary

This report has been commissioned by Design for London (DfL)/London Development Agency (LDA) and Greater London Authority (GLA) to provide evidence to inform a new London Plan policy on the percentage of accessible hotel bedrooms required to meet demand now and over the next 20 years.

A room which is 'accessible' is defined as one which minimises barriers to use for as many people as possible. It is a wider definition than a room being wheelchair accessible as it allows use by people with disabilities other than mobility impairments. Policy and planning requirements have previously been based around the definition of wheelchair accessibility, but this is now considered to be too narrow a definition of disability, as well as being based on an outdated medical model of disability.

1.1 Vision and principles

The draft replacement London Plan has been prepared against the background of:

- a growing and changing population for London over the plan period (to 2031), with increased proportions of the young and elderly, and more households
- continued structural change in London’s economy, with more business and service sector jobs
- persistent problems of poverty and disadvantage
- a changing climate
- a need for better social and physical infrastructure, and
- consistent demands for improvements to people’s quality of life.

The Mayor’s response is a vision from now to 2031 and beyond, he has also said: "I want London to be the best big city on earth". To do this will imply London needs to be become more accessible and inclusive. Indeed, the draft London plan talks about:

- implementing the Tourism Vision which requires improvement the quality, variety and distribution of visitor accommodation and facilities
- future development meeting the highest standards of accessibility and inclusion, including an indication of how inclusion will be maintained and managed.[1]

Improving accessibility across London is a strategically important issue and offers the potential for businesses to increase revenues by providing a better mix of service provision. The Mayor launched a new equality framework for London, Equal Life Chances for All, in July 2009. The aim of this framework is to promote sustainable improvements across the city that benefit its residents, including the most disadvantaged people.

[1] GLA, Draft London Plan, 2009

In line with the Equal Life Chances for All framework and to increase the contribution of tourism to the London economy, the GLA and LDA are now seeking to assess how far inclusive design principles can be applied to London's hotel accommodation. The LDA is also working with businesses to exploit demand by disabled people in accessing London-based services. As part of this work, the GLA is devising a set of principles, polices and programmes on inclusive access. Improving accessibility is also a priority for GLA functional bodies, such as Transport for London.

1.2 Demand for accessible rooms

Current demand

This study concludes that potential demand for accessible rooms in 2010 would be around 4% of the total rooms available, if there was an appropriate level of supply available.

Around one-half of demand is currently unmet, as the proportion of accessible rooms is less than 2% of existing stock. This so-called latent demand exists not just because of lack of supply of accessible rooms, but because of a whole host of factors including wider travel and institutional barriers around car parking, public transport, access to visitor attractions etc.

This 4% demand estimate is based on combination of qualitative and quantitative evidence including:

- a national survey which suggests that 8% of UK resident visitors to London cite a member of their group as having 'any disability'[2]
- analysis of the international tourism market and an assessment of the barriers and the propensity of disabled travellers from other countries to travel to the UK
- outcomes from a focus group of wheelchair users who use hotels in London which suggested there was a shortage.

Within the 4% demand for accessible rooms will be a multitude of differing requirements. In particular, demand for wheelchair accessible rooms is estimated to be around 1% of total demand, based on survey evidence around visitors who had any 'mobility impairment'.

Future demand

Going forward, demand for accessible rooms in London is likely to increase substantially for two reasons. Firstly, latent demand is likely to be realised as barriers disappear and/or are removed (eg improvements in travel by tube in London). Secondly, ageing demographics mean that the proportion of disabled people is likely to rise, as impairment is linked to age.

There are uncertainties in any forecast beyond 2-3 years, but for planning purposes, our central scenario suggests that demand :

- **for accessible rooms in London will increase from 4% to 7.5% of the total over the 2010 to 2031 period**

[2] Preliminary data from UK Travel Survey (UKTS) covering period January - June 2009. In this time, the survey suggests 420,000 visitors to London were disabled and 110,000 had mobility impairments.

- **by wheelchair users will increase from around 1% to 3.5% of the total over the 2010 to 2031 period**

The projection for wheelchair users is less robust and should only be seen as a rough order of magnitude. It is sensitive to assumptions and dependent not only on how fast institutional barriers are removed in London and the UK but also and more critically on when and to what extent they are removed in other countries, which is clearly difficult to predict.

1.3 Supply of accessible rooms

Current supply

In 2010, there are around 2,000 hotel rooms in London which are accessible, equivalent to 2% of the existing stock of hotel rooms. This supply is considered to be inadequate for the following reasons:

- the stock does not meet the level of demand, measured by the proportion of likely visits to London from people with 'any disability', estimated to be around 4%[3]
- there are widespread problems identifying available and suitable accessible rooms. It is often very difficult for disabled people to track down such a small segment of the total market which involves identifying which rooms are not occupied, not constrained by other barriers (accessible transport, car parking etc) and are suitable in terms of location and price
- there is poor choice compared to accessible provision in other areas of London life. For example, all London buses and taxis are now wheelchair accessible and TfL remains on target to make a quarter of all tube stations step-free by 2013.

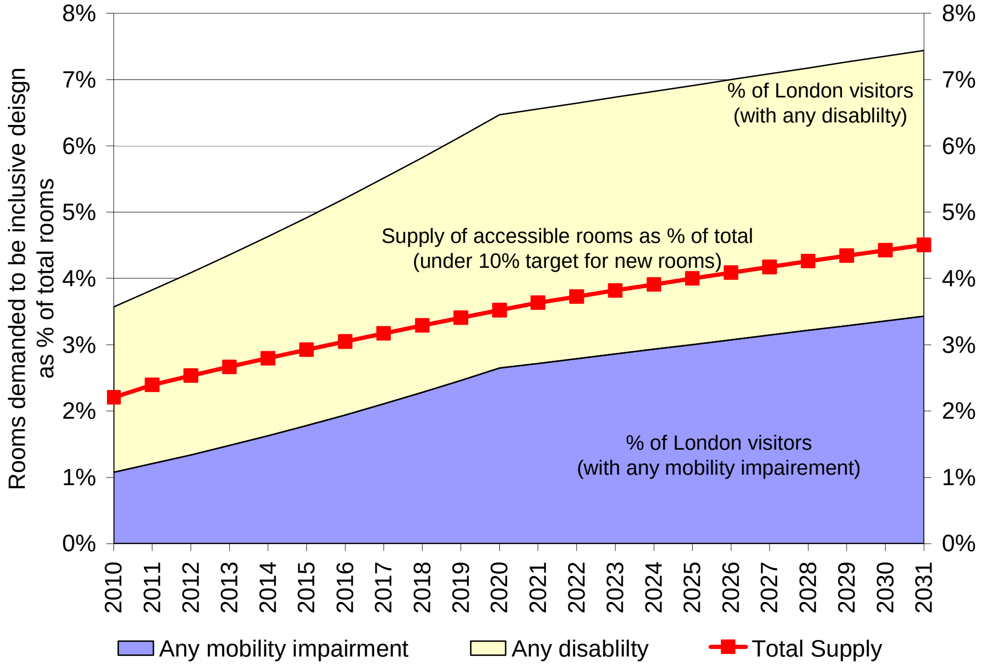
Future supply

Hotels built since 1999 have been required by Building Regulations to ensure 5% of new rooms built to be wheelchair accessible. This is having the effect of increasing the supply of hotel rooms but is unlikely to raise the number to any significant degree, with only around 100 new accessible rooms expected to be provided each year, the equivalent of raising the supply by just 0.1% each year. Clearly, a higher target is needed to ensure the number of accessible rooms is increased at a faster rate and meets increased demand.

Under the requirement that 10% of new hotel rooms are accessible rooms, then the total stock of accessible rooms would reach 4.5% by 2031 (just over 6,000 rooms) as summarised in Figure 1.1 below.

[3] Classification as in UKTS, see previous footnote.

Figure 1.1: Scenarios of demand and supply of accessible hotel rooms (2010-2031)



It could be argued that a higher benchmark that of say 20% or 30% should be imposed to ensure that the required stock of accessible rooms is reached much quicker. If 30% of new rooms are accessible, for instance, this results in the total supply of accessible rooms reaching 10% by around 2031. However, our analysis suggests that such a high percentage requirement could change the business model around hotel development endangering future hotel investment in London.

1.4 Conclusion

Our analysis, interviews and research, combined with UKTS data shows that there are probably not enough accessible rooms to meet demand by disabled people. In addition, hotel rooms are often not in the right place and/or are constrained by other barriers (travel, car parking, lack of information). There is also little information available to the public about where there are available rooms. All too often disabled people have to contact many hotels directly in order to find an available room, rather than using on line booking agencies and web sites.

With no change in the existing 5% policy, the gap between supply and demand is expected to grow in future years, due to ageing demographics and to the gradual removal of institutional barriers in other countries.

A policy requiring 10% of all new rooms to be accessible will help better match demand and supply by disabled people and also allow them greater choice and ease of access to appropriate rooms.

This is a conservative requirement as it only applies to new rooms, is much less onerous than the requirement for public transport and is the same as the requirement proposed for new housing. Under the 10% target, the number of accessible rooms is estimated to increase from 2% in 2010 to 4.5% by 2031 (see Figure 1.1 above).

This is consistent with the Mayor's best practice guidance on wheelchair accessible housing which states that at least 10% of new homes should be designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users.

1.5 Best Practice Guidance and Recommendations

Best Practice Guidance (BPG), produced alongside this report, sets out the key features of accessible rooms, how these can be applied to rooms of different sizes and how application of these can encourage flexible room use. In particular:

- which principles of inclusive design and adaptation need to be factored into the 10% requirement. At a minimum, all 10% of these rooms should meet Building Regulations, but 5% could be provided in flexible ways. Options include rooms that are smaller than the typical accessible room but better designed (including with flexible furniture and fittings) or larger rooms which can also be used as suites by families and by groups. These choices should be described and justified during the planning application process through the Design and Access Statement
- the requirements for hotels to submit, as part of the planning application, an Accessibility Management Plan. This will ensure their policies to support guests with different access needs are articulated, in place and meet expectations. Early consideration of how the accessible rooms are to be managed and used will also encourage inclusive access to become part of the overall operation and business of the hotel.

Going forward, it is recommended:

- the adoption of a policy that requires 10% of new hotel rooms to be accessible
- the GLA/LDA should consult with building and room design practitioners on the BPG
- increased provision of information on the location and availability of accessible rooms. LDA, Visit London and Visit England should encourage a single scheme to be developed with the objective of matching supply and demand for accessible accommodation. Information provided by different agencies confuses visitors and reduces the effectiveness of signposting
- improvements to the collection of data on the number of disabled visitors to London and the number of disabled visitors staying in London hotels. This action is in hand and the Office for National Statistics have begun to explore visitor trends by disabled visitors through the UKTS and International Passenger Survey
- an implementation plan is developed with boroughs and Communities and Local Government with the objective of improving the understanding of this new policy and local regime are set up to check compliance with both the planning system and the new London Plan policy.

2 Introduction

2.1 Terms of reference

This report has been commissioned by Design for London (DfL)/London Development Agency (LDA) and Greater London Authority (GLA) to provide evidence to inform a new London Plan policy on the percentage of accessible hotel bedrooms required to meet demand. The report has been produced by Grant Thornton in association with Colin Buchanan, David Bonnett Associates (DBA) and Inclusion London.

There are three specific objectives for this study:

- to provide robust evidence to support/challenge the proposed percentage of accessible rooms (10%) set out in the draft London Plan
- to review the existing design guidance available and supplement this with Best Practice Guidance (BPG) to inform new planning applications, taking account of inclusive design principles
- to make recommendations on how existing and current guidance can be best applied to hotels in London.

This study and associated BPG will help support the hotel industry in improving and widening its provision to cater for what is a growing and valuable market, by giving practical advice and suggestions for how this can be done.

2.2 Our approach

The approach to the study involved a mixture of market research, hotel visits, statistical analysis and consultation, comprised of the following tasks:

- **a review of the current available levers and guidance** for hoteliers in ensuring good provision of accessible hotel environments and bedrooms, including the planning system
- **research into the tourism market and hotel market** to understand the context in which accessible hotel bedrooms will be delivered
- **an assessment of demand and barriers to using accessible hotel bedrooms,** in both quantitative and qualitative terms. The quantitative assessment uses existing data on tourism and estimates the size of the potential market for accessible hotel bedrooms. The qualitative analysis informs our understanding of the barriers faced by disabled people and is based on the themes identified in a focus group of eleven wheelchair users who use hotels in London
- **assessment of current supply of accessible bedrooms**, by using existing audit data of hotel rooms in London and a consultation of a handful of hoteliers to understand how well existing accessible bedrooms are used and by whom.

The key outputs for the study are:

- an evidence base on demand and supply for accessible hotel bedrooms (this main report)
- an assessment of overall hotel demand in London to 2031 (see Appendix A)
- draft BPG, which the GLA can take forward o support the London Plan (which is at Appendix B).

There are clear links and co-dependencies between these outputs, with the analysis and evidence informing the shape, content and structure of the draft BPG. This study also builds upon the 2006 study[4] conducted by Grant Thornton on the hotel market, which includes forecasts of hotel room requirements for 2006 to 2026.

2.3 Key principles

This study is based on a social model approach to disability and the promotion of inclusive access and design.

The Social Model

The social model of disability states that people are not disabled by virtue of having an impairment, but by barriers in the physical and social environment. A social model approach prioritises the identification of those barriers, in order to recommend ways in which to remove those barriers so that people with impairments are no longer disabled by them.

The types of barriers that disabled people encounter can be:

- **physical**, such as inadequate turning circles, or steps and stairs - these barriers may be historical, but can be removed or avoided
- **information and communication**, such as lack of accessible formats, or inability to use sign language - these barriers are extremely disempowering as information and communication are basic building blocks in participation
- **organisations systems**, such as policy or working practices around marketing or letting hotel rooms - these barriers should be the easiest to address but are often the most entrenched
- **social norms, culture and attitudes**, such as stereotyping wheelchair users as needing to be accompanied by a 'carer' - these barriers are often perpetuated through negative images in the media.

To illustrate, people with visual impairments need information provided other than in standard print (eg Braille menu) and if only standard print is available, that is a barrier that prevents them from fully participating in society. Similarly, the social model solution to inaccessible hotels involves understanding the access needs of those who want to use them, such as bathrooms that allow wheelchair users to manoeuvre to access the toilet, and addressing those needs.

Taking a social model approach (ie understanding the barriers that disabled people experience and what their access needs are) provides a route to ensuring full participation.

[4] Hotel demand study, by Grant Thornton and The Leisure & Tourism Organisation (2006) for the Greater London Authority.

The alternative to the social model is the medical model. In this approach, people are seen as disabled by their impairments. So, disabled people are the problem, and society needs to remove their impairment (cure) or look after them (care). This model is no longer acceptable to many disabled people because it reinforces the misconceptions and stereotypes of disabled people as dependent and incapable of making a positive contribution to society.

Inclusive Design

As part of the social model grounding for this study, an inclusive design approach to the accessibility of hotel accommodation has been used. Inclusive design is based on the premise that the built environment should be designed, built and managed so that it does not discriminate against, or disable, the individual.

The Commission for Architecture and the Built Environment's (CABE) principles of inclusive design have been adopted in this study, as illustrated in the Box below. These principles are supported by the GLA and LDA, as a process to ensure that its interventions in the built environment do not result in the exclusion and discrimination of any particular group of people. Inclusive design is about:

- creating an environment that everyone can use
- removing the barriers that create separation and special treatment
- enabling everyone to participate equally and independently in everyday activities[5].

The box below illustrates what this means in practice.

Box 2.1: Principles of inclusive design
The key CABE principles of inclusive design are that a building should be:

- **Inclusive -** so everyone can use them safely, easily and with dignity
- **Responsive -** taking account of what people say they need and want
- **Flexible -** so different people can use them in different ways
- **Convenient -** so everyone can use them without too much effort or separation
- **Accommodating -** for all people, regardless of their age, gender, mobility, ethnicity or circumstances
- **Welcoming -** with no disabled barriers that might exclude some people
- **Realistic -** offering more than one solution to help balance everyone's needs and recognising that on solution may not work for all.

Definitions

The essential terminology used in this document refers to:

- inclusive or accessible hotels: both terms are used interchangeably and refer to premises and management practices which welcome their guests, whether disabled or not

[5] LDA Inclusive Design Toolkit

- accessible rooms: this term is used in preference to wheelchair accessible rooms, and indicates a room which has adequate circulation space for a wheelchair and is designed to facilitate use by older or disabled customers, but that can also be used with complete satisfaction by all other potential guests

A full breakdown of features that make an inclusive hotel and accessible hotel room are given in Chapter 10.

3 A new policy for London

3.1 The London Plan

The London Plan is a statutory planning document which covers the strategic planning policy for London. The plan is currently being revised to cover the 2011 and 2031 period and was published in December 2009[6] for consultation.

The relevant draft policy statement on accessible hotel rooms is as follows:

> Improving the availability of hotel accommodation that is genuinely accessible to all is a particular priority and at least 10 per cent of new provision should be wheelchair accessible. The Mayor will prepare guidance on accessible hotel accommodation and on the implementation of accessibility management plans.

Relevant policies on tourism and hotels include the following:

> Strategic: The Mayor, boroughs and relevant stakeholder should seek to achieve 40,000 net additional hotel bedrooms by 2031, of which at least 10 percent should be wheelchair accessible.
>
> Planning decisions: developments should contribute towards the hotel provision target and ensure that at least 10 percent of bedrooms are wheelchair accessible.
>
> LDF preparation: LDFs should seek to ensure that all new visitor accommodation meets the highest standards of accessibility and inclusion and encourage applications to submit an Accessibility Management Plan with their proposals.

3.2 Equal Life Chances for All

The Mayor launched a new equality framework for London, Equal Life Chances for All, in July 2009. The aim of this framework is to promote sustainable improvements across the city that benefit its residents, including the most vulnerable and disadvantaged people.

As part of this work, the GLA is devising a set of principles, polices and programmes including around housing, where the Mayor's Best Practice Guidance on wheelchair accessible housing states that at least 10% of new homes should be designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users. Improving accessibility is also a priority for Transport for London (TfL). All London buses and taxis are already wheelchair accessible and TfL remains on target to make a quarter of all tube stations step-free by 2013. The LDA is also working with business to meet demand by disabled people, including wheelchair users, in accessing London-based services.

[6] GLA, *The London Plan, Spatial Development Strategy for Greater London, Consultation draft replacement plan*, October 2009

In line with the Equal Life Chances for All framework and to increase the contribution of tourism to the London economy, the GLA and LDA are now seeking to assess how far inclusive design principles can be applied to London's hotel accommodation.

3.3 Rationale for change

Grant Thornton study undertook an initial review of demand and supply of accessible hotel rooms in 2006. It found that just 23 rooms have been identified as wheelchair accessible, with around 165 rooms allowing some, but not full, wheelchair access. This was a very low proportion of overall supply, and therefore an update to the London Plan was made in 2008:

> The Mayor will work with strategic partners to implement his Tourism Vision and achieve 40,000 net additional hotel bedrooms by 2026, to improve the quality, variety and distribution of visitor accommodation and facilities. Boroughs should support an increase in the quality and quantity of fully wheelchair accessible accommodation in light of integrated strategic and local assessments. (Policy 3D.7)[7]

This policy has now been strengthened in the draft replacement London Plan and a 10% target is stated in order to:

- demonstrate commitment to accessibility
- maximise the value of tourism to the economy
- speed up the provision of accessible rooms given expected demand in 2012.

The latter of these would be achieved by attracting more wheelchair users, by broadening the customer base and by attracting people who would benefit from flexible room provision (families, older people etc). The 2012 Olympic Games and Olympic and Paralympic Games ('the Games') is a further driver for the policy change - the Mayor has committed that the Games will be the 'most accessible ever'. Public sector agencies are already supporting businesses in maximising the potential in this area.

There have been recent changes in British Standards guidance (BS8300:2009) which also prompted a review of the current policy (see Chapter 4). In headline terms, the changes to this guidance suggest more facilities for disabled people in more rooms are needed.

3.4 Volume and value of disabled tourism

A number of organisations have examined the size and structure of the tourism market among disabled people. Among some of the key findings are set out below:

- **Tourism for All** (1989) concluded that accessibility is an all-embracing concept; high standards of accessibility benefit everyone and should always feature in information and marketing; and that catering for the needs of all potential visitors is good business.

[7] GLA, The London Plan (consolidated with alterations since 2004), 2008

- the **Disability Rights Commission** estimated the travel market among disabled people in the UK alone to be worth over £6 billion every year. If we looked at international travellers to London, this figure would be higher.
- **Touche Ross** (1993)[8] estimated that 117 million visits to Britain could be generated by the market for disabled travellers, including their travelling companions. The estimated impact was £22 billion in extra tourism expenditure for Europe.
- **Leonard Cheshire** (2005)[9] found that hotels were 'failing to accommodate disabled people'.
- **Visit Britain** (2006)[10] emphasised the importance of good customer care in dealing with disabled visitors and that the size of this market would grow over time.
- **Enjoy England** (2007)[11], found that disabled people encounter problems when booking and planning holidays, particularly in booking accommodation. In focus groups and interviews, they said that no comprehensive source of information was available to help them in these tasks.
- **Eurostat** (2008)[12] in an assessment of tourism in the EU, noted that travel amongst disabled people was growing. It stated
  - 9% of people were registered as severely disabled
  - the overall number of disabled people is close to 25%.
  - the number of trips per person that could be made by disabled people, who are financially and physically able to travel, would be the same as for the average population.
- the **'Europe for All'**[13] EU programme identified the European accessible travel market to be 127 million people or 27% of the EU population, including disabled people, older people and their travel companions. They estimate this market is worth €80 billion to Europe every year.
- the **LDA**[14] estimates that the over 50s spend 40% more on holidays than the under 30s, taking 5 to 6 breaks a year

Clearly, there has been a significant amount of research undertaken, but the large range of estimates around the volume and value of the industry indicate that there is a lack of robust and available information on the market. This issue has been around for some time, originally identified as far back as the 1970s in the study 'Tourism - the Social Need'.

Steps have been undertaken to improve this situation. The Government's 1999 strategy **Tomorrow's Tourism** renewed its commitment to increasing accessibility in the tourism sector and notes that while some improvements have been made (see Box below), there remains more work to do.

[8] Touche Ross, *Profiting from opportunities*, 1993
[9] Leonard Cheshire, *No Room at the Inn*, 2005
[10] VisitBritian, *Foresight* Issue 26, 2006
[11] EnjoyEngland, *Access consumer research*, 2007
[12] Eurostat, *Panorama on Tourism*, 2008
[13] Europe for All, Information and marketing on accessibility
[14] LDA, Tourism Business Support Programme

Box 3.1: Current sources of information

Visit England administers the **National Accessible Scheme** This is a voluntary scheme in which accommodation providers can participate. It identifies how accessible the accommodation is in three categories, for:

- mobility impaired people
- blind or visually impaired people
- deaf or hearing impaired people.

The individual ratings are represented by symbols displayed on websites and used in promotional literature such as the Open Britain guidebook. Hotels only have to have one fully accessible room to be endorsed by EnjoyEngland. Endorsement is based on an inspection by EnjoyEngland and assessment against a check list of facilities and provisions. It is estimated that 2% of hotels nationally use the NAS and 5 hotels in London are part of the scheme.

Tourism for All is a charity that provide a service to disabled people, running a helpline to match up the specific holiday needs of disabled people with particular providers. The service goes wider than accommodation.

Direct Enquiries has conducted an audit of 194 hotels in London and as a result, lists 1,349 rooms in London as accessible. Direct Enquires is a private company and was commissioned by LDA to undertake the audits. The result of its work is listed on its website. This service was commissioned by the LDA and is promoted by Visit London.

The spending power of disabled people is sizeable at around £80 billion[15]. But survey evidence on disabled hotel customers suggest that an opportunity is being missed:

- 83% of disabled people 'walked away' from inaccessible or unwelcoming businesses in 2005, unable or unwilling to make a purchase; only just over half complained about the poor service they received
- 67% of disabled people choose businesses which are good at serving disabled customers
- 58% of disabled people say that the way in which businesses treat them affects the shopping habits of their friends and families. 26% say that poor service means others are less likely to shop with the business; a further 16% said that friends and family **never** shop with companies which have provided a poor service[16].

The spending power of those over 50 and over 65 is also higher than average. Over-fifties hold 60 per cent of the UK's savings, represent about 80 per cent of the UK's disposable wealth and are responsible for 40 per cent of the consumer demand in the UK, spending. This is significant as the incidence of disability impairment increases with age.

[15] DWP
[16] Employers' Forum on Disability with Royal Association for Disability and Rehabilitation, supported by Intercontinental Hotel Group, *The walk away £*, 2006

Consumer spending among the UK's 50-to-69-year-olds currently runs at £300 billion a year, and this group buy more designer fashion, premium cars, and other expensive goods than any other group. The average expenditure for households of 50 - 59 year olds is £213 a week, compared with an average of £135 for all other age groups.

3.5 Developing the accessible market

Efforts are being made to develop the tourism market and exploit opportunities. As well as improving the quality and quantity of information to disabled travellers (supporting demand), Government and tourism agencies are working with hotel operators (the supply side) to develop its service offer for disabled travellers. For instance:

- LDA runs its Open to All programme which supports businesses in the tourism industry to become fully accessible. The support is free and includes half day workshops, online training for staff, free access audits and free promotion through Tourism for All Holiday Guide.
- Department for Culture, Media and Sport (DCMS), have in train a programme to ensure the hotel industry is gearing up for the Olympic Games in 2012 as part of a wider 2012 tourism strategy[17]. This involves working with the hotel (and other) industries across the UK to enable them to understand the benefits of widening their service provision around accessible hotels.
- Tourism South East offers a number of resources to the hotel industry including providing templates for Design and Access Statements, posting video case studies on its site and an accessibility podcast to demonstrate how businesses can maximise the value of accessible tourism.
- Visit London are encouraging businesses to take advantage of accessible opportunities by making their services more accessible and have included an award for Accessible Tourism in their annual awards.
- the AA which runs the star-rating system for hotels, promoted the Accessible Hotel Awards between 2001 and 2004. Hotels awarded the top prize and rated 'highly commended' for accessibility were typically 4 star hotels. Since DDA obligations were been made legally binding in 2004, the AA has decided it is no longer necessary to give profile to accessible accommodation in this way and discounted these awards.

3.6 Conclusion

Accessible hotels are a policy priority for the GLA/LDA not only as a means to grow the size of the tourism market, but also as part of an overarching strategy to make London a place accessible to everyone.

[17] DCMS, *Winning: A tourism strategy for 2012 and beyond,* 2007

4 Current policy and guidance

This chapter identifies the key policies which affect and influence the provision of accessible accommodation in London, covering:

- the planning system
- Disability and Discrimination Act
- Building Regulations)
- guidance (British Standards, PAS 88).

4.1 The planning system

The planning system can play a major role in promoting and encouraging inclusive design. The key planning-based guidance is 'Planning and Access for Disabled People', produced by the Office of the Deputy Prime Minister (ODPM) in 2003 to promote inclusive environments. The guide is targeted at both the public sector (planning officers, councillors, English Heritage etc) and the private sector (architects, developers and investors etc), and focuses on the physical aspects of building design.

At the London level, GLA utilises the planning system as the main lever of influence. In particular, the London Plan policy on accessible room provision, first articulated in the 2004 plan and then consolidated in 2008, is as follows:

> The Mayor will work with strategic partners to implement London's Tourism Strategy and to achieve 36,000 additional hotel bedrooms to 2016 and to improve the quality, variety and distribution of visitor accommodation and facilities. (Policy 3D.6)[18]

Relevant policies in the latest draft plan include the following:

> The Mayor will work with strategic partners to implement his Tourism Vision and achieve 40,000 net additional hotel bedrooms by 2026, to improve the quality, variety and distribution of visitor accommodation and facilities. Boroughs should support an increase in the quality and quantity of fully wheelchair accessible accommodation in light of integrated strategic and local assessments. (Policy 3D.7)[19]
>
> The Mayor, working with strategic partners, will improve the tourism environment, visitor information and management to provide a better visitor experience and manage the pressure on key tourism locations. (Policy 3B.10)[18]

[18] GLA, The London Plan, 2004
[19] GLA, The London Plan (consolidated with alterations since 2004), 2008 and Draft London Plan, 2009

> The Mayor will require all future development to meet the highest standards of accessibility and inclusion. DPD policies should integrate and adopt the principles of inclusive design so 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
> - are realistic, offering more than one solution to help balance everyone's needs, recognising that one solution may not work for all.
>
> The principles of inclusive design should be used in assessing planning applications and in drawing up masterplans and area planning frameworks. Design and access statements should be submitted with development proposals explaining how the principles of inclusive design, including the specific needs of disabled people, have been integrated into the proposed development and how inclusion will be maintained and managed. (Policy 4B.5)[18]

This supports a wider drive for inclusion by the Mayor, in line with national government policy[20]. It does not however set any specific or measurable targets to increase the supply of accessible rooms and relies on the boroughs' assessment of local needs. In practice this has resulted in the adoption of a 'fall-back' position, by which Part M of the Building Regulation is the driving force to increase supply and the main platform for the assessment of the quality of provision.

In addition, Supplementary Planning Guidance (April 2004) on achieving an inclusive environment within the tourism industry states:

> To address the shortage of accessible hotel accommodation in London, the Mayor will, and boroughs should require all proposals for hotels meet the highest standards of accessibility and inclusion. (SPG Implementation Point 20).

Compliance checks against these London Plan policies are undertaken by each London borough. The box overleaf provides a summary of how far the current planning policies affect and inform planning applications and how borough-level planning polices can help deliver policies on accessibility. Detailed analysis is included in Appendix D.

[20] PPS1: Delivering Sustainable Development elevated the importance of high quality and inclusive design, placing it at the centre of the development process.

Box 4.1 Review of planning applications

Five planning applications and associated borough policies have been reviewed to understand how far planning policy currently encourages provision of accessible hotel bedrooms. Conclusions are as follows:

- plans for accessible hotel rooms are not scrutinised in detail at the planning application stage, with a tendency to delegate the issue to the Building Regulation Consent stage
- the level of detail regarding accessibility in planning statements and design and access statements varies quite considerably between applications and further guidance is needed
- there are no overarching policy standards that are being enforced and best practice guidance is seldom adopted
- the majority of hotel applications reviewed meet the minimum requirement of 5% accessible rooms, in line with the Building Regulations, but do not exceed this
- the levels of accessible provision specified does not differ between different grades of hotels, but applications for luxury hotels appear to allow more flexibility
- accessibility is often taken to mean those who have mobility impairments (ie wheelchair users) and does not extend to other impairments such as visual or hearing impairment.

Overall, enforcement of best practice guidance is weak and not enforced at the borough level.

4.2 Disability Discrimination Act

The Disability Discrimination Act (DDA, 1995) aimed to end the discrimination that disabled people face and provides disabled people with rights in the areas of employment, education, access to goods and services, buying land and property (and for tenants to make adaptations) and functions of public bodies. These rights were further strengthened by the 2005 amendment which strengthened the duties of public bodies.

As part of the Act, firms are legally required to make reasonable adjustments to all facilities and services, including the physical features of premises, and to overcome any barriers to access by customers and any disabled employees.

DDA uses the following statement to describe who the act protects:

A person has a disability for the purposes of this Act if he has a physical or mental impairment which has a substantial and long-term adverse effect on his ability to carry out normal day-to-day activities.

Note that the DDA definition is essentially a medical approach to disability, rather than a social model which is used in this study.
Access audits might be independently undertaken where firms wish to test their own compliance with this legislation, say through providers like Tourism for All. Some financial support exists for undertaking these - the LDA offer these to hoteliers as do tourism agencies such as Tourism South East.

Service providers, such as hotels, are subject to the DDA part 3, under which they may not discriminate against disabled people, and in order not to discriminate they may have to make 'reasonable adjustments'. Such adjustments may be to policies, practices or procedures or, if it is a physical feature that makes the service unreasonably difficult or impossible to use, adjustments must be made removing, altering or providing a way of avoiding the feature. The service may also be provided by reasonable alternative means. If the service provider fails to make their service accessible, a disabled person may challenge them through the courts. It is the courts that will decide what constitutes 'reasonable' in any particular case.

In order to determine whether their service presents unreasonable barriers to disabled people, it is advisable for service providers to undertake access audits. Access audits are not obligatory, but they provide greater assurance that a service provider is conforming to the requirements of the DDA.

4.3 Building Regulations

Building Regulations provide the standards that each development needs to meet in order to receive consent. Compliance with the Building Regulations is necessary and enforceable by the Local Authority. The regulations apply to most new buildings and many alterations of existing buildings in England and Wales, whether domestic, commercial or industrial. They are intended as the minimum acceptable standards of building and construction.

The legislation covers both the technical standards that need to be met and the procedures that need to be followed. The key part of Building Regulations that support accessibility is **Part M** - **Access to and Use of Buildings**. This deals with the need to provide wheelchair accessible buildings and includes specific guidance for hotels. Part M was revised in 2004, partly to reflect changes made to BS8300:2001, but also to foster a more inclusive design approach to design to accommodate the needs of all people and explain the relationship between Part M and the DDA.

They include guidance on accessibility in the following areas:

- car parking and set-down
- ramped and stepped access
- entrances, lobbies and doors
- corridors and passageways
- lifts - passenger lifts, platform lifts and stairlifts
- aids to communication
- specific guidance around bathrooms and washrooms, showers
- accessible toilets in public areas of hotels such as bars and restaurants.

For hotels (or sleeping accommodation), key features specified for all rooms include:

- space to allow access around beds, to bathroom/washrooms and balconies
- built in wardrobes and shelving are accessible and convenient to use
- visual fire alarm signals
- room numbers to be in embossed characters
- at least 5% of rooms to be wheelchair accessible where there is choice about type of room and location of room within hotel. These should have amenities equivalent to other rooms
- choice of bath or shower.

There is particular guidance around:

- use of showers, which are often easier for mobility-impaired people, and having a wash basin next to the WC
- emergency assistance alarms
- connecting doors for a proportion of accessible rooms for travel companions (not compulsory)
- electronic card activated locks and lever taps in bathrooms for those with limited manual dexterity (not compulsory).

Design and access statements provide essential supplementary evidence in support of planning applications. They set out strategic decisions on accessibility but also how the needs of disabled people, and the principles of inclusive design will be incorporated into the scheme. Research shows that there is little awareness among businesses of what these statements are, the need for them or their or value, yet 76% of consumers say access statements influence their decision to visit.[21]

Building regulation officers ensure compliance against the guidelines at building control and planning approval stage, but buildings are not always inspected once the completion certificate is issued and the building is occupied.

4.4 British Standards

British Standards BS 8300:2009, mentioned above, is a code of practice on designing buildings and their approaches to meet the needs of disabled people[22]. The 2001 edition was revised and republished in February 2009.

It contains detailed guidance and diagrams in similar areas to the Building Regulations (parking, setting down, access to and around buildings, handrails and ramped access, entering a building, horizontal circulation, lifts etc). There is also particular guidance on showers, accessible bedrooms, and standards in relation to toilets.

BS8300 specifies that an accessible bedroom should cater for as wide a range of disabled people as possible. They should always be provided with en-suite sanitary facilities if that is the standard approach in other bedrooms.

[21] Live Tourism, *Is London ready to welcome disabled visitors*?, 2010
[22] BSI British Standards, BS8300:2009, *Design of buildings and their approaches to meet the needs of disabled people - Code of practice,* February 2009

Importantly, BS8300 sets out suggested provision in new buildings of:

- 5% of rooms to be wheelchair accessible
- 5% of rooms to have a fixed tacked-hoist system or similar system giving the same degree of convenience and safety
- 5% of rooms that should be capable of being adapted in the future to accessibility standards.

The evidence base that informed these figures is unclear, although BS8300:2009 specifies space required around beds, clear widths around door openings, easy to use door fittings, access to balconies and windows, furniture and fittings.

4.5 Publicly Available Specification 88

This document (PAS 88) was developed by the Disability Rights Commission (now merged into the Equality and Human Rights Commission) with VisitBritain and the British Standards Institution[23]. This guidance was developed specifically to improve good practice in hotels and specifically for large hotels and hotel groups (a chain of six or more hotels).

Key elements of the PAS 88 standard are:

- setting out an Access Strategy, to demonstrate that design, refurbishment and product selection decisions have, or will address DDA requirements
- promoting disability equality training to increase the understanding of disability and access issues, including around communication
- producing and communicating information in accessible formats, including pre-arrival information and associated procedures.

In addition, standards in relation to similar areas as above are detailed - car parking, approaches to the building, vertical and horizontal navigation around the building, signs etc. The key difference with PAS 88 is that guidance is made specific to hotel accommodation whereas other guidance is for all indoor areas and all buildings.

4.6 Other guidance

Other standards and guidance exist, particularly published material to support architects and designers such as the Centre for Accessible Environments (CAE) 2004 Designing for Accessibility Guide, a Good Loo Design Guide and Specifier's Handbook for Inclusive Design. All of these would be relevant to hotel design and build but the option to purchase and use such guidance is not mandatory.

4.7 Assessment of existing guidance

Current legislation and the Building Regulations continue to be focussed on the needs of disabled people by encouraging inclusive design and inclusive environments which in turn mean people are not excluded or segregated by their ability to use or not use a particular facility.

[23] British Standards Institution, *PAS88:2008 Guidance on accessibility of large hotel premises and hotel chains, in association with VisitBritain, Equality and Human Rights Commission and BSI*, 2008

Current guidance should not, therefore be seen as ineffective; for those whose impairment is primarily physical, and specifically wheelchair users, it has made a significant difference to the day to day lives of a lot of people.

However, the current Part M is the only guidance that is fully adopted by hotel operators and developers, as it is mandatory. Other documents are only considered in a minority of cases. Part M is only concerned with the physical environment and primarily mobility impairments. As such, its effectiveness is reduced, primarily because provision may adhere to Part M and nevertheless not be well integrated in the hotel as a whole.

Part M, BS8300, PAS-88 and other existing guidance form the basis for the BPG which helps draw out which features need to be addressed at planning applications stage for the effective provision and management of accessible hotel rooms. In doing so, the BPG offers clarification of expectations and examples of best practice, but does not introduce any new standard (see Appendix B).

4.8 Conclusion

The existing guidance currently available recognises that the many benefits to society as a whole of providing a social and physical environment which takes account of the needs of disabled people leads to the concept of inclusivity in many aspects of life. Hoteliers must abide by the DDA and can be legally challenged where there is evidence they have not made reasonable adjustments to allow disabled people to use their hotel.

The analysis of the planning system was also revealing, showing accessible hotel rooms are not scrutinised in detail and planning application stage and that a degree of variation exists between boroughs in enforcing their policies, checking Design and Access Statements and promoting use of best practice. Encouraging widespread implementation of the various pieces of best practice guidance remains an issue to resolve for GLA in the context of a new policy.

This completes our assessment of the policy environment driving changes in the area of accessibility. The next four chapters look closely at demand and supply of overall hotel accommodation and accessible accommodation.

5 The London tourism market

This chapter considers long term trends in tourism relevant to the demand for accessible rooms, covering:

- London's strategic vision for tourism, as set out in Mayoral strategies
- trends in international visitors to London
- trends in domestic visitors to London
- the overall London visitor profile.

The demand for accessible accommodation is the subject of the next chapter.

5.1 London Tourism Vision

London's visitor economy has been affected by the global recession and is currently facing great challenges. However there are also many opportunities, such as the Olympic and Paralympic Games. London's Tourism Vision 2006-2016 sets out a clear and coordinated approach outlining the key challenges and priority areas for future action up to and beyond the 2012 Olympic and Paralympic Games:

> "By 2016, London will be recognised as the leading global city for tourism and as a constantly evolving destination. London will deliver a high quality visitor experience, continually surprising and exciting our visitors with a vibrant, contemporary, diverse offer in an historically and culturally rich environment. Tourism in London will contribute to the economic success of the city and the quality of life for Londoners".
>
> Source: LDA, London Tourism Vision, 2006

London Tourism Vision will be delivered through a series of three-year Action Plans. The second of these, the London Tourism Action Plan 2009-13, sets out the current priority areas. Key themes include London as:

- a global city
- a quality visitor experience
- a sustainable and inclusive city
- showing professionalism at every level
- providing industry support and partnership.

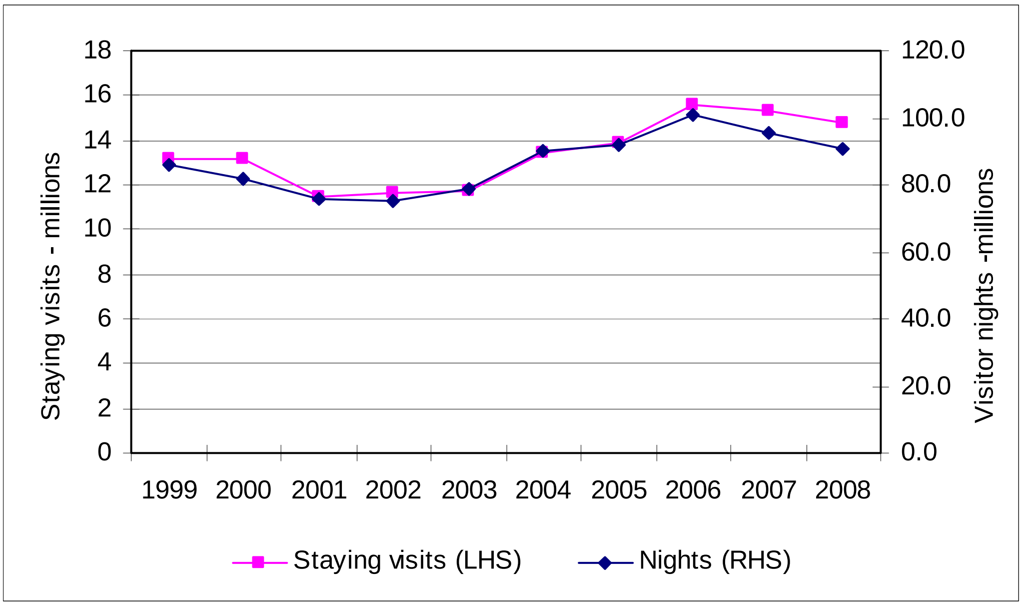
Of particular relevance is the creation of a sustainable and inclusive city for all, which includes improving the inclusivity and accessibility of the visitor experience.

5.2 International visitors and nights in London

London is the world's most popular city for international tourists[24]. Tourism is a vital contributor to the city's economy generating around £10.5 billion in overnight spend per annum[25].

The overseas market is important for London. In 2008, there were nearly 15 million visits to London, staying for over 90 million nights[10]. The chart below shows the longer-term trend in the number of visits to and visitor nights in London by international visitors. It is important to note that these figures include those on holiday, business visitors, those visiting friends and relatives and those studying.

Figure 5.1: International visitors to London, 1999 to 2008

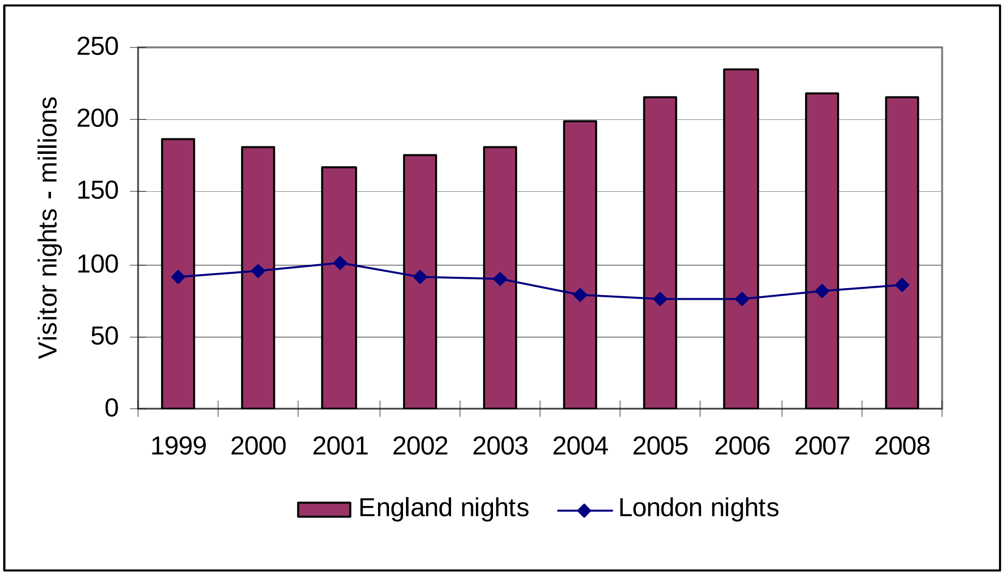


Source: International Passenger Survey (IPS) 2009 (A full list and description of data sources and is at Appendix E).

[24] Euromonitor's Top 150 City Destinations Ranking
[25] Visit London, *Key Visitor Statistics,* 2008

London's share of all international visits to England is around 40% of all visitor nights, but has declined slightly over the past 10 years[26].

Figure 5.2: International visitors to London and England, 1999 to 2008



Source: IPS 2009

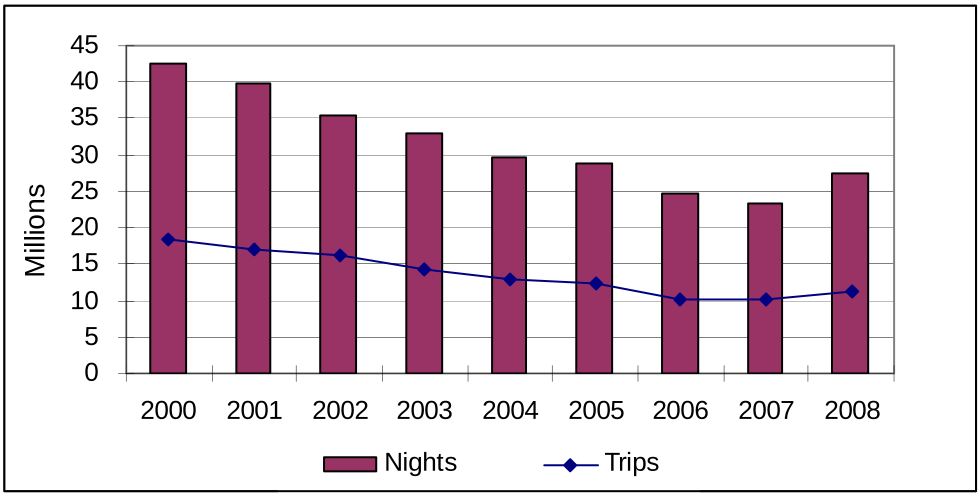
Total **UK** visits were 31.9 million in 2008 and are estimated to be 30.3 million in 2009[27]. On average, the number of nights stayed in the UK has been falling. In 2008, international tourists spent on average 7.7 days per visit, spending 245.8 million nights **in the UK**. Over the last decade, while visitor numbers have been increasing days spent per visit have been decreasing.

5.3 Domestic visitors and nights to London

Domestic visitors to London have been falling since the peak of 2000 as shown below, although 2008 numbers show a slight recovery, reaching 11.3 million trips.

[26] A full description of datasets available in the area of tourism is given in Appendix A.
[27] Visit Britain.

Figure 5.3: Domestic visitors to London, 2000 to 2008



Source: UK Travel Survey (UKTS), 2009

5.4 Total visitors to London

There were 26.1 million visitors to London in 2008. Over past decade, overseas arrivals have shown strong growth while domestic visitors to the capital have been decreasing. However in 2007 overseas arrivals started to decline, with domestic tourists to London increasing in 2008. There are several factors contributing to this, including the global recession, with fewer people travelling overseas, as well as the strengthening of the Euro which has resulted in many Britons holidaying closer to home.

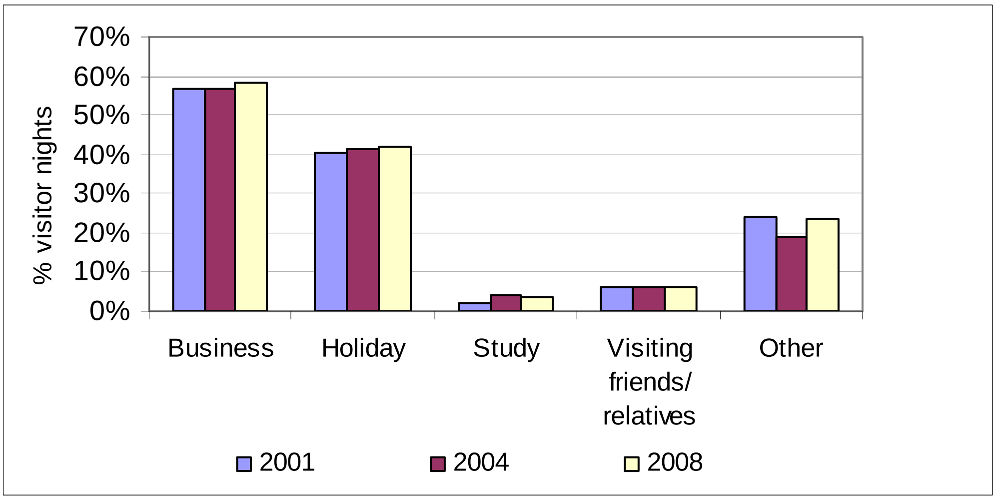
Figure 5.4: A comparison of international and domestic visitors to London, 2008

	International visitors	Domestic visitors
Proportion of visitors to London	57%	43%
Average length of stay in London	6.1	2.4
Proportion that stay in hotels	42%	35%

Source: IPS, UKTS, London Visitor Survey (LVS)

Of the international visitors to London, business visitors are more likely to stay in hotels or bed and breakfast accommodation, followed by holiday makers. These proportions have been rising in recent years, as show below.

Figure 5.5: International visitors to the UK staying in a hotel or B&B, 2001-2008



Source: IPS

5.5 Profile of visitors

The London Visitor Survey profiles the visitors to London. The 2008 survey, based on a sample of 5000 visitors, showed:

- 59% of visitors to London were male and 41% were female
- 55% of visitors to London were aged 34 or under, and 13% were aged 55 or over
- the main purpose of visiting London was for holiday/leisure, followed by visiting friends and relatives
- most visitors to London stay in central London.

This suggests overall, London has a young visitor profile. This is important because, as we have shown, the incidence of impairment increases with age.

Recent data available from UKTS shows that 8% of visitors to London from other parts of the UK would classify themselves, or a member of their party, as disabled. Furthermore, 2% said that they or a member of their group had a mobility impairment.

5.6 Forecast of visitors to London

We have developed a model based on GDP to project domestic and international visitor numbers to London. The underlying logic is that higher GDP per head (ie income or wages per head) will increase the marginal propensity to consume which will probably increase hotel demand in London. The impact of economic growth on tourism (the so-called income elasticity of demand) and passenger travel has been well researched.

The total number of visitor nights spent in London by UK and non-UK residents is expected to grow by 46% over the 2008-2031 period, from 118 million in 2008 to 172 million by 2031. The methodology and assumptions used are set out in Appendix A.

This analysis suggests that **around 35,000 extra (or net) hotel rooms will be required over the 20 year period from 2011 to 2031.**

5.7 Conclusion

Tourism is a key strength of the London economy and is likely to remain so, despite short term deviations stemming from the global recession. In particular:

- around 40% of visitors to London are from the UK and around 60% are from overseas
- London attracts around 50% of all international and 10% of all domestic tourists to the UK. Overseas visitors to London who typically stay longer and spend more than their domestic counterparts, have been growing since 2006, with domestic tourists showing an increase in visitor numbers in 2008
- over the medium term, demand for tourism in London is likely to remain buoyant, with a 46% increase in demand by international and domestic tourists
- hotels remain a popular form of accommodation for tourists to the UK - with around 40% international visitors and 35% of domestic visitors using them, particularly for business and holidays.

6 Demand for accessible hotel accommodation

This chapter considers the demand for accessible hotel accommodation, covering a:

- qualitative assessment of what is required in accessible accommodation, based on the outcomes of the focus group held on 5 October 2009.
- quantitative estimate of demand until 2031 based on modelling and economic analysis.

6.1 Focus group findings

A focus group of 11 wheelchair users who regularly use London hotels was convened by Inclusion London to help understand the barriers to hotel use.

Key findings from this focus group are given in the box below, under the four main themes of the discussion.

Box 6.1: Focus group findings

Getting information about booking a room

- hotel definitions of 'accessible room' vary
- staff taking bookings have little knowledge of available facilities, and when given, are sometimes unreliable. Booking specific facilities cannot often be done online or with call centres - it needs to be done directly with hotels, which is also problematic and leaves disabled guests sometimes no way of finding good information
- quality of information provision is poor - NAS was not seen as useful
- accessible rooms are often let to non-disabled guests so disabled people cannot even book them
- disabled people are asked very personal information about what facilities they can/cannot use which impacts on dignity and freedom of choice

Getting to and into hotels

- parking provision is poorly planned - not enough spaces, low height restrictions for adapted cars and sometimes a need to pay for parking even with blue badge
- directions from local blue badge parking spaces to hotels are not clear enough

Using facilities - bedrooms, bathrooms, public areas

- users need space that can be used flexibly- for twin beds, double beds, two wheelchair users, beds of different heights, family rooms
- no consistent policies (especially among chains) on rooms for PAs
- facilities in accessible rooms not maintained or able to be locally controlled eg. heating

..continued..

- additional facilities are often not made available such as mattress toppers or luggage trolleys.
- disabled peoples' core needs are to be able to get in and out of bed, use the toilet and have a wash (shower/bath).
- some users prefer showers (level-access) and some prefer baths. A mix of rooms should be available.
- beds are not positioned near light switches, voice activation could help solve this.
- hotel rooms seem to be getting smaller.
- too many heavy doors in around bedrooms and hotels, automatic keys could help open these.
- specialist facilities eg. ceiling track hoists, can be designed in a way so they do not make the room like a hospital.

Giving feedback on the hotel stay

- complaining requires lots of personal details to be shared.
- four and five star hotels tend to provide better customer care and more assistance.
- staff training should include respecting disabled people.

Other views

- compliance with policies and guidance is key. Hoteliers need to meet legal obligations. A room may meet building regulations at the time of completion but over time, furniture and fittings are added which make this void.
- fittings are inconsistent - a low toilet and a high bed in one room make it difficult for users.
- décor of accessible rooms can be intrusive and hospital-like, needs to be more discreet.

A full write up of the focus group is provided in Appendix F.

This focus group suggests that from the point of view of disabled people, that they are not easily accommodate in hotels. Suggestions for improvement are that existing rooms need to be used better, staff need to be better trained and much better information about facilities is needed. In addition, booking systems need to allow rooms to be allocated to people who need the adapted facilities and allow them to be used by people with other needs which might not be impairments, such elderly people or people with young children.

Other areas suggested for improvement included physical, fit-out and management-related issues (ie improvements in the standards of service for all guests, not solely disabled guests). All these areas for improvement feature strongly in the BPG. The suggestions around using new technology and less medical-looking design are also part of the BPG.

6.2 Wider evidence on barriers to use

The LDA have commissioned market research from Arkenford Consulting on how London can improve its tourism offer. Part of this research is focus on accessibility of London and the findings will therefore need to be considered alongside those of the focus group conducted for this study.

Other published evidence and guidelines suggest the following barriers to use and potential solutions/requirements[28]:

- **entering the building**: doors can be difficult to use including revolving doors as sometimes these are not wide enough. Key readers to enable hotel room doors and other internal doors to be opened also need to be at an appropriate height. Access from the street can also be problematic where there are steps or broken pavements and also insufficient set down and pick up space outside the hotel entrance.
- **moving around the building**: lifts need to be provided so disabled people can access the levels they need to. The lifts need to be big enough, doors wide enough and doors need to be open for long enough. Controls inside the lift need to be clear enough for people to use.
- **car parking**: setting down and dropping off need to be near the building. On-site parking should be reserved for use by disabled guests and these spaces need to be of the right dimension and need to allow rear access to vehicles. Where ticket machines need to be used, they need to be accessible to wheelchair users and telephone numbers should be displayed so help can be provided if needed. Lighting needs to be provided around the bays to support those with poor sight. Any routes to and from car parking spaces need to have firm surface routes and be free from obstacles. Lack of accessible public transport may also make the hotel difficult to reach.
- **bathrooms**: doors need to be wide enough and there should be enough transfer space around toilets, bathrooms and showers. Bathroom floors should be slip-resistant. Taps need to be clearly distinguishable, fixtures and fittings should be recessed and have round edges. Rails need to be fitted in the right places to support toilet, bath and shower access and should be able to take heavy weights. In line with BS8300, fitting ceiling track hoists is necessary to accommodate severely disabled guests (see Box 6.2)
- **colour schemes**: these should be contrasting to allow someone with a visual impairment to use rooms easily. Adjustments that may help include contrasting bathroom fittings, avoiding too many neutral tones or complicated patterns or high gloss finishes, making sure steps can be seen clearly.
- **lighting**: using the right lighting can help disabled people move around the building without causing glare, confusing reflections or shadows. It can also help illuminate passageways. In hotels, bedrooms should have even lighting and increased lighting in certain areas. Controls for lights should be placed around the bed.

[28] This summary highlights findings of research carried out by the British Security Industry Association, Department for Transport, Equality and Human Rights Commission, Visit Britain, Centre for Accessible Environments and Communities and Local Government. Detailed guidance on overcoming barriers, including specific size dimensions, is given in British Standards, Public Accessibility Standards 88, NAS, Centre for Accessible Environments and in the other sources.

- **signage**: clear and easily understood signage can help people navigate the building, avoid hazards and reach facilities. Clear and simple signs would be in contrasting colours, in large print, in a consistent case, also provided in braille and mounted in places where Braille readers can reach them.
- **emergency procedures**: in an emergency, some people may need assistance to leave the building or reach a place of refuge. Alarms should be visual (a flashing light) as well as audible and evacuation chairs should be available to transport guests through stairwells should they need them. Emergency escape doors, like all doors, should be kept clear of obstacles and be wide enough to accommodate wheelchairs.
- **room devices**: the way these are designed and manufactured can support use by different people, including alarm clocks, telephones and TV remote controls.

In addition, there may be particular needs for ceiling track hoist users and demand for these is a subset of overall demand for accessible rooms. The box overleaf has more information.

6.3 Barriers to travel

In addition to adequate provision and effective marketing of accessible accommodation, there may be other factors that restrict the number of disabled visitors to London including:

- **access to transport** - the bus, tube and train system, if not fully accessible will restrict the number of people visiting certain parts of the city. The converse is also true, so where inclusive access is provided, hotels may see more disabled visitors than in other areas.
- **cost** - London is perceived as a high cost destination, particularly within the UK leisure market. Furthermore, with a shortage of rooms, disabled people tend to use 3 and 4 star hotels as rooms in these are more spacious than in budget hotels. These rooms are also more expensive. Live Tourism's consumer research identified that disabled visitors look mostly for cheaper accommodation (budget hotels and B&Bs) but end up having to book mid range hotels; 44% of disabled visitors were considering staying in budget hotels but could not find places that fulfilled their requirements[29]
- **access to visitor attractions** - where the main reason for the visit is leisure , this may be important. Though this has not been researched, it has been suggested that where popular visitor attractions are not accessible, this is likely to mean the number of disabled leisure visitors to a city may be lower.
- **social inclusion and participation -** if a city promotes and encourages business to provide services to disabled people and other groups, it is more likely disabled people will use these facilities and have the confidence to request specific help. There is clear requirement for businesses to promote disability equality nationally, through the DDA. In London, GLA and LDA are also committed to the promotion of inclusion and participation.

[29] Live Tourism, *Is London ready to welcome disabled visitors*?, 2010

Box 6.2: Ceiling hoists - policies, supply and demand

British Standards guidance suggests 5% of new hotel rooms should have ceiling track hoists available. There are very few hotels with these facilities in London. The Ceiling Track Users Club lists 4 hotels in London with ceiling track hoists (3 of these are IHG hotels and the other is the Copthorne Tara).

Ceiling track hoists have a permanent track fitting. The hoists are detachable and can be stored separately. Hoists are used to lift disabled people and move them into and out of bed and bath, for instance. Mobile hoists can be used, but these are not as strong, may be uncomfortable for the disabled person and require some floorspace.

Mencap leads the Changing Places campaign to install toilets in large public places which are suitable for adults with multiple disabilities. This includes, among other features, a ceiling track hoist (or a mobile hoist is this is unavailable).

Overall demand for hoists is difficult to test. So testing demand and viability locally, even on a hotel by hotel basis, is likely work better. For instance, nationally, **IHG has installed 7 fixed track hoists in 6 properties and note these have demonstrated a strong return, though could not provide a figure as this varied among hotels**. Further investment is not ruled out by IHG. The 6 hotels were carefully selected on the basis of how well connected they are to accessible transport facilities, availability of conference facilities etc.

IHG was offered free installation for 12 months from a hoist supplier. 12 months later, these had demonstrated strong return and IHG then purchased them.

Franchisees were keen to ensure that fitting these did not affect demand from non-disabled people, or that they should not make the rooms unsightly. There is no evidence of negative feedback from non-disabled hotel guests that use these rooms, an important general finding which shows inclusive design can improve the offer without affecting existing custom.

IHG suggest in this case, **inclusive design principles were adopted and important** to the outcome. For instance, use of two separate tracks (one in the bedroom and one in the bathroom) instead of one. Where one track is fitted, this requires doors and other attachments to be flexed and the hoist then becomes a dominant feature. Also, while the fixed tracks are discreet and can remain in place, the hoist attachment can be fitted when needed.

6.4 Quantitative estimation

We have undertaken the estimation of demand in 5 steps and in different scenarios. The short note on data below outlines the key data issues pertinent to this estimation.

Box 6.3: Data

The UKTS and IPS are the main surveys of domestic and international travel trends. Currently, there is no published data from either of these surveys on trends relating to disabled travellers. However, there are plans to collect and publish data on this in coming years. ONS undertakes both these surveys. ONS envisages publishing UKTS data on 2009 trends in Spring 2010 and IPS data collection is also planned for 2010.

Please note that data sources to estimate supply and demand in this area are scare and alternative data sources were reviewed when considered to use them as proxies. These are summarised at Appendix E.

Step 1: Domestic disabled visitors to London in 2010

The first step involves estimating the number of disabled visitors who travel to London. The UKTS survey[30] reports that that some 8% of UK resident visitors to London cited a member of their group as having 'any disability' (ie hard of hearing, deaf, blind, mobility issues etc). This will be an overestimate of demand as, for example, individuals travelling in a large party would all provide a positive response even if only one member of their group was disabled. On the other hand, a significant proportion of disabled people are likely to have put off travelling to London by existing institutional, economic and social barriers. This is the so-called latent demand effect.

This estimate is comparable to other statistics. Using indicators such as motability subscribers, blue badges issued and the proportion of people claiming disability benefits (see Appendix E) suggests that disabled people represent between 4% and 8%.

Based on the above data and various different sources, we consider that a realistic estimate of the potential (existing and latent) domestic travel demand is around 6%. In other words, 6% of UK resident visitors to London will be disabled.

Step 2: International disabled visitors to London in 2010

On the international side, the propensity for disabled people to travel is likely to be significantly less than domestic visitors as there will be greater barriers due to both perceived issues around airline travel and also the extent to which the origin country has an inclusive attitude towards disabled people.

[30] Preliminary data from UK Travel Survey (UKTS) covering period January - June 2009. In this time, the survey suggests 420,000 visitors to London were disabled and 110,000 had any mobility impairment.

For example, the propensity for disabled people to travel from the United States with its well developed accessibility policies is likely to be much higher than many developing countries which are only just starting to tackle this issue. The propensity to travel for non-UK residents is estimated to be around one-half that of domestic visitors, which is based on an assessment of the extent to which the top 20 tourism origin markets have an inclusive attitude toward disabilities. The implication is that some 3% of international travellers are likely to have 'any disability'.

Step 3: Total domestic and international disabled visitors to London
Combining assumptions from the domestic and international travel markets gives an overall estimate of London visitors with any disability of around 4%**,** given that two-thirds of visitors to London are international visitors. This level of demand captures people with any disability and not all of them will require wheelchair accessible rooms. Indeed, of this demand, some people may be able to use standard hotel rooms with some auxiliary facilities.

Within this group will be a multitude of differing requirements. It is estimated that travel by demand for wheelchair users is around 1% of total demand. This is based on the UKTS survey which reports that 2% of visitors to London have a mobility impairment, but adjusted downwards to take into account that this statistic is for domestic only travel and also covers a range of mobility impairments from walking difficulties to wheelchair use.

Step 4: Projecting growth 2011 - 2031
Going forward, demand is likely to increase for two reasons. Firstly, latent demand is likely to be realised as barriers disappear and/or are removed (eg improvements in travel by tube in London). Secondly, ageing demographics mean that the proportion of disabled people is likely to rise, as impairment is linked to age. London tends to receive many young visitors, which counteracts this trend to some extent.

Our modelling suggest that demand for hotels rooms from:

- people with any disability will increase from 4% to 7.5% of the total over the 2011 to 2031 period
- wheelchair users will increase from 1% to 3.5% of the total over the 2011 to 2031 period.

The projection for wheelchair users is less robust and should only be seen as a rough order of magnitude. It is based an estimation of how fast institutional barriers are removed in London and the UK but also and more critically on when and by how much they are removed in other countries, which is inherently difficult to predict. It is therefore sensitive and should be seen as indicative in the absence of more robust estimates.

Step 5: Consideration of Olympic effect
There is also the Olympic impact in 2012 to consider. The box below summarises the assumptions made by LOCOG in relation to demand for hotel rooms in 2012 and are consistent with our estimates in this report.

Box 6.4: The Olympics effect
At the London Organising Committee for the Olympic Games (LOCOG), a working assumption has been adopted that estimates the number of wheelchair users in London in 2012 to be 300,000. This includes athletes, officials, spectators, the LOCOG family and tourists.

In terms of rooms, the range of wheelchair accessible hotel rooms projected as required in 2012 varies from 1,745 to 13,956. The degree of variation is based on the fact that demand for wheelchair accessible rooms is expected to lie between 1% and 8% of all visitors.

LOCOG has set itself a target to ensure 3,500 accessible rooms by 2012. This implies an additional 1,500 over above what is currently available. If this target were met, only 2,500 would need to be delivered between 2012 and 2031. We should note this is a separate target but if achieved, will help increase overall stock of accessible hotel rooms in London so that demand may be met more quickly.

Policies to deliver this 3,500 are being developed and include a new requirement for hoteliers to build 10% of their room as accessible rooms. The two targets are therefore very closely linked. A 10% requirement will help LOCOG meet ambitions and delivery of those ambitions will help GLA provide enough rooms to meet demand by 2031.

6.5 Conclusion

Focus group and other evidence suggests that matching of supply and demand is not being done effectively. As well as perceived lack of information for users, it appears that suppliers provide rooms on the basis of different definitions and with varying facilities and levels of accessibility.

More rooms with a mix of facilities might allow more guests with varying needs to be accommodated, including families, older people and occasional wheelchair users. Booking procedures would need to be sophisticated enough to make this information available to the public.

7 The London hotel market

This chapter sets out the key characteristics of the London hotel market, covering:

- the overall number of hotel rooms in London
- the development pipeline
- key market characteristics
- our overall assessment of hotel demand in London up to 2031.

7.1 Number of hotel rooms in London

In 2009, there were over 110,000 rooms provided in serviced accommodation in London[31]. Over the 1981 to 2009 period, the supply of hotel rooms has grown by 50%. The annual breakdown of development and projections to 2012 is shown in the table below.

Table 7.1: Supply baseline and projections

Year	Room supply	Stock Additions and Pipeline	Stock Reductions	% Annual Growth
1991	75,686	-	-	-
1996	79,212	-	-	-
1997	80,405	1,279	86	1.5%
1998	83,179	2,839	65	3.5%
1999	86,323	3,374	230	3.8%
2000	89,863	3,651	111	4.1%
2001	91,270	1,644	237	1.6%
2002	93,248	2,357	379	2.2%
2003	96,294	3,155	109	3.3%
2004	98,421	3,134	1,007	2.2%
2005	100,122	2,177	476	1.7%
2006	101,232	1,610	500	1.1%
2007	103,603	2,371	500	2.3%
2008	107,263	2,144	500	3.5%
2009*	**108,428**	**1,165**	**500**	**1.1%**
2010*	**112,749**	**4,321**	**500**	**4.0%**
2011*	**115,348**	**2,599**	**500**	**2.3%**
2012*	**118,403**	**3,055**	**500**	**2.6%**

Sources: Visit London, LDA, Westminster City Council 2005, Grant Thornton estimates.

[31] LDA Accommodation Census, 2009. In addition, there was a further 31,000 rooms mainly in educational establishments although these are not available all year.

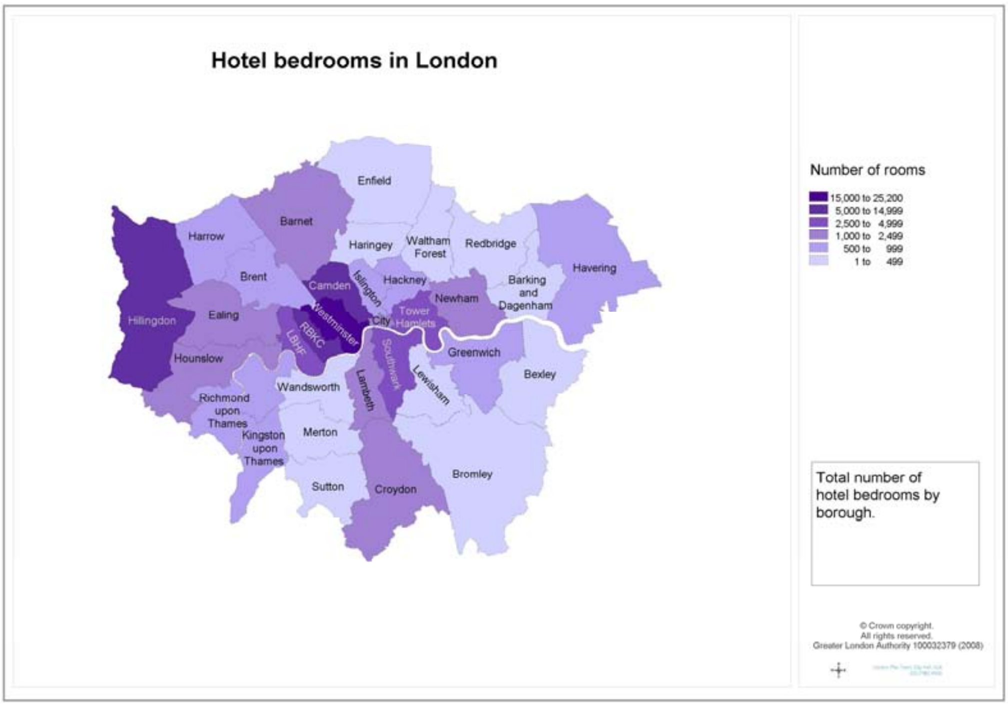
The growth in hotel rooms is expected to continue with over 11,000 new rooms estimated to open in London between 2009 and 2012[32]. The equates to 2,750 new hotel rooms each year, which is above the 1991-2008 average of around 1,900.

Current trends suggest that 41% of new hotels will be 5 star hotels, 27% will be 4 star and 21% will be budget hotels.[33]

7.2 Location of hotel rooms

The location of hotel rooms and hotels across boroughs in London is shown in Figure 7.2 & 7.3. A large percentage of hotel bedrooms are in Westminster where there are 495 hotels with over 35,000 hotel rooms, representing 25% of hotels and 26% of hotel rooms across London. There are also significant clusters in Camden, Kensington, Hillingdon (around Heathrow) and Tower Hamlets (around Canary Wharf).

Figure 7.2: Hotel bedrooms by London borough, 2009

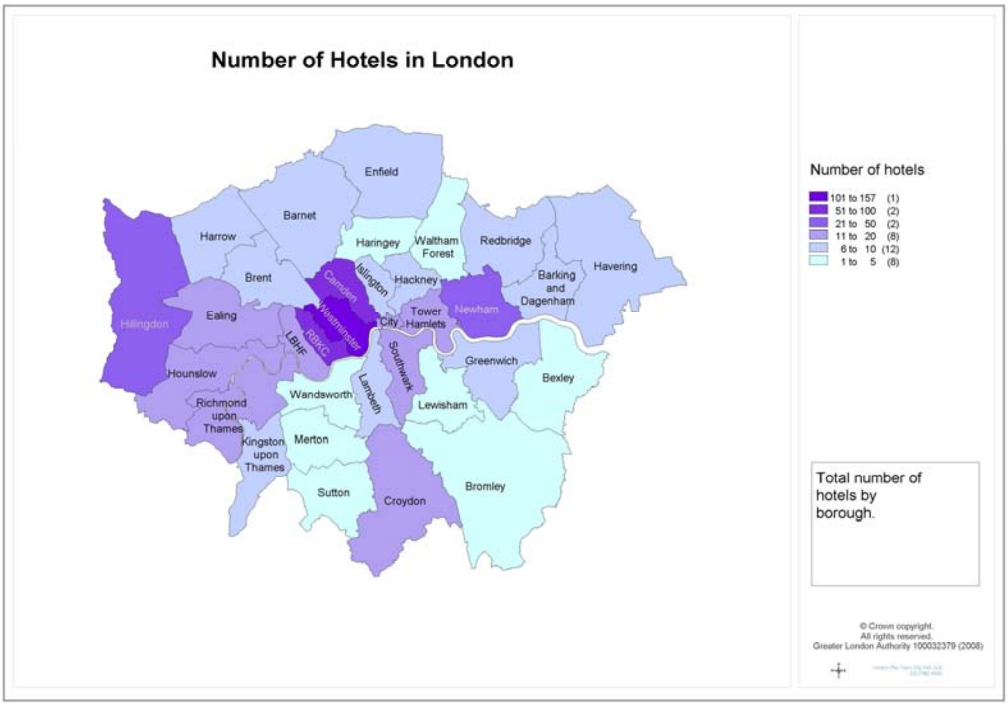


Source: LDA, GLA

[32] The London Development Database and TRI show a total of 10,700 rooms are confirmed to be built between 2009 and 2012. Further hotel rooms have planning permission or are awaiting planning approval, making them *probable* by 2012. We have assumed a mid-range forecast between those *confirmed* and those *probable*, giving 11,140.

[33] TRI Hotel Development monitor, July 2009 and October 2009

Figure 7.3: Hotels by borough, 2009



Source: LDA, GLA

7.3 Hotel market characteristics

Since the start of the UK recession in the second quarter of 2008, hoteliers have been hit significantly and have seen revenues fall. Occupancy of hotel rooms in London, while still high at around 80%, fell by 1.6% in 2008 and is expected to decline by a further 5.8% in 2009 and 0.1% in 2010[34]. Stabilisation is expected to occur in 2011. The hotel market is then expected to pick up, not least due to the 2012 Olympic and Paralympic Games which remains a significant opportunity.

In percentage terms, the largest growth over the 2002-2006 period was in the 'budget' category with over 60% growth but we saw in the previous section that five star and four star hotels are expected to grow most in coming years. However, TRI estimate that budget hotels will grow by 60% in the UK over the next 10 years, growing a total of 149,000 bedrooms by 2017.

Brand leadership

Around 30,000 rooms or 30% were provided by branded hotels in 2006, with Intercontinental Group offering the most hotel rooms followed by Thistle at over 6,000, Hilton at under 6.000, Accor, Premier Travel Inn and then Marriot at around 3,500. Premier Inn travel is the largest budget hotel provider with over 4,000 rooms. Visit London note that brands are developing, with the emergence of more apartment hotels and boutique hotels. New operators are also noted as entrants to the market such as Park Plaza, City Inn and Grange Hotels.

[34] Deloitte Hotel Assessment, 2009.

Emerging locations for development

The London boroughs with most hotel rooms are the boroughs of Westminster and Hillingdon. However, the relative scarcity of land for new development in these particular areas mean that opportunities in other areas of London need to be found. This has led to the development of fringe central areas, such as Canary Wharf and the South Bank. Good transport links have meant these sites have long been popular for businesses and leisure visitors.

In addition, new transport links at St Pancras and Stratford have reinforced this trend, while the western London boroughs continue to gain from their proximity to Heathrow. This is not forgetting major urban regeneration projects such as the 2012 Olympic Park and the Greenwich Peninsula, which are also freeing up land for hotel development.

7.4 Hotel room requirement to 2031

An update to our 2006 forecast of hotel room demand suggests that 1,700 extra ('net') rooms will be required per annum over the 20 year period to 2031, or an equivalent of around 35,000 extra (or net) hotel rooms over the 20 year period.

Appendix A gives an outline of the model and outlines the assumptions used to calculate this estimate.

This estimate is 15% lower than the previous forecast produced in 2006 of 2,000 net new hotel rooms required. The reasons are due to both technical reasons and economic/ tourism-related factors:

- around half of the lower forecast is due to the shift in the timeframe from 2007-2026 to the later 2012-2031 period, where the London tourism market is expected to experience lower growth as the market reaches maturity
- the remainder is then due to a lower long-term forecast in visitors to London and visitor nights. Forecasted growth in domestic and international visitors over the past few years has not materialised even allowing for a temporary blip due to the global economic recession - eg international visitor nights have fallen significantly from 101 million in 2006 to just under 91 million in 2008.

Under the requirement that 5% of all new hotel rooms are accessible, then this suggests a further 550 rooms would be provided by 2012 on current estimates (and over 1,000 with a 10% requirement).

7.5 Sensitivities

Our estimate that around 35,000 extra (or net) hotel rooms would be required over the 20 year period is a central scenario. There are significant uncertainties involved in such a long term forecast. Our modelling using a range of plausible assumptions suggests that the number of hotel rooms required is likely to range from 20,000 net extra hotel rooms to 60,000 net extra hotel rooms.

7.6 Conclusion

Current estimates suggest an extra 11,000 rooms will be delivered between 2009 and 2012[35]. We also see that:

- growth has been increasingly take place in areas outside Westminster
- there is a strong pipeline - with a potential for an 8% increase between 2009 and 2012
- the hotel supply projections have been affected the economic downturn, demonstrated by lower occupancy and revenue in recent months, though this is now showing signs of improving.

The fact that growth is projected in five and four star accommodation suggests more new rooms will be larger (averaging 30-35 square metres per room in a luxury hotel down to 10-12 square metres for a budget hotel). Due to the extra space, these may be accessible to more people.

The longer term central projection shows that **around 35,000 extra hotel rooms will be required between 2011 and 2031,** with a high and low estimate of the extra rooms required ranging from 20,000 to 60,000.

[35] TRS hospitality for LDA and Visit London, *Hotel Development Monitor,* 2009

8 Supply of accessible accommodation

This chapter sets out the current number of accessible hotel rooms and their key features.

8.1 Accessible rooms in London

We have assumed in our demand estimation that 2% of all rooms (2,000) are already accessible, on the basis of the Direct Enquiries audits. This may meet current demand by wheelchair users in theory, it does not meet demand from people with other impairments.

This is based on the LDA 2009 census which shows there are 1,349 known accessible hotel rooms in 211 hotels. Direct Enquiries has been commissioned by LDA to audit 194 of these hotels. Direct Enquiries list accessible hotel bedrooms on their online Nationwide Access Register website, which provides detailed information on the rooms (including photographs) and facilities (roll in showers, hoists, sign language). Information is also provided on wider access such as baby changing facilities, pushchair access and languages spoken.

Facilities in accessible rooms also vary. For instance, Direct Enquiries conduct audits that look at provision across 18 features not just features that promote inclusive access for disabled people but also for parents with young children and older people. For instance, of the rooms audited, on 97 had a roll in shower and only 4 had ceiling track hoists. These are likely to be far lower than actual need and provision of more roll in showers, in particular, could help achieve other ambitions, such as improving sustainability.

8.2 Supplier consultations

As part of this study, a number of visits to hotels around London have been undertaken. A list of questions used in these consultations is included in Appendix G.

The role of the person interviewed varied - sometimes being the hotel manager, while at other times, someone leading sales. We have set out key findings in Box 8.1. These are on the basis of seven on-site consultations, including visits to accessible rooms. Six were in hotels (two in outer London, four in central London, one in a five star, two in a four star, one in a three star, one a two star and one not rated) and one was with an accessibility officer based in a head office.

Box 8.1: Supplier (hotelier) consultation outcomes

Occupancy

- Accessible rooms tend to be used regularly by non-disabled users.
- The proportion of accessible rooms varied from 1% to 10% (in a small hotel).
- One hotel had undertaken an extension recently, and 5% of the extra rooms were accessible.
- Intercontinental Hotel Group (IHG) conducted their own study of how many of their rooms needed to be wheelchair accessible, and this study showed 0.02% were needed (it was not possible for us to see this study). Therefore in IHG hotels, a matrix system operates, whereby the largest hotels (built pre-2008) with over 600 rooms have a maximum of 8 accessible rooms. Hotels with 400-600 rooms have 6 accessible rooms, hotels with 140-200 rooms have 4 and hotels with 140 rooms or less, have 2.
- Accessible rooms are let to non-disabled visitors on a last-let basis. No statistics are collected on how many wheelchair users use the accessible rooms. Anecdotal evidence was given in most cases where managers said '1 or 2' wheelchair users visited the hotels in the previous six months.
- On bookings, disabled people largely contact these hotels directly by phone to make bookings and discuss specific needs. When this was done, hotels said they make preparations to ensure those guests have a comfortable visit.

Accessible features and policies

- The definition of an accessible room varied - but mostly it was assumed to imply wheelchair users could use the rooms. The main features of accessible rooms were more space, lower beds, fitted alarms, grab rails in the bathrooms and lowered sinks. (However, most of these rooms have baths not level access showers).
- The public parts of hotels were mostly accessible to wheelchair users. In one hotel, access to rooms was through a separate entrance and the dining area could only be accessed by detouring through the kitchen. Accessible toilets in the public areas were mostly in place except in one hotel visited. Furthermore, only some hotels had parking, some had multiple doors in public areas and some had narrow entrances to lifts.
- The location of accessible rooms within hotels varied - some hotels had these on each floor, one had them together on a single floor and others had them only the ground floor.
- Evacuation procedures were reported to be in place in all hotels to support wheelchair users. In one hotel visited, a separate exit and lift was designated for use by wheelchair users in an emergency.
- Apart from IHG, there seemed to be few hotel policies on provision for disabled visitors, for instance, IHG have a policy of reduced room rates for PAs and carers. A sample access information flyer is at Appendix H to this study to give an idea of information provided by IHG on selected hotels.
- Two hotels visited had linked rooms - these needed to paid for, even when carers were travelling. It was noted these were popular with families.
- A couple of hotels had extra facilities available like induction loops, vibrating pillows and bath benches.

..continued..

- The quality of design in accessible rooms was not as high in older hotels compared to newer hotels, for instance, grab rails appeared imposing.
- The quality of the accommodation appears to be better in the newer hotels although this is patchy. For instance, only two rooms in the hotels visited had a level access shower and two rooms in all the hotels we visited had a ceiling track hoist.

Use of rooms

- Generally it appeared that no data was collected on how the accessible rooms are used and by whom.
- One hotelier said the accessible rooms could be fitted with bunk beds to turn them into family rooms. Another said the lowered sinks and toilets meant they were popular with families who were travelling with children.
- When non-disabled guests are allocated accessible rooms, there appeared to be few complaints. Those interviewed suggested this was because guests were usually happy to find an available room. Only in the room with a ceiling track hoist did non-disabled guests regularly complain about how imposing this fitting was.

Training for staff

- Many of those interviewed talked about mandatory DDA training given to staff, although it was not clear what this was. There was no suggestion that this training gave staff anything beyond what is mandatory such as use of specialist equipment or facilities.
- The five star hotel interviewed said staff would show guests to accessible rooms and talk them through features.
- Telephone operators booking rooms also seem to have been given training of the features of particular rooms and accessible rooms.
- One view gathered from Tourism for All was that take up of NAS is higher outside of London because hotels in London are profitable without undertaking targeted marketing.

National Accessibility Scheme

- Only one of the hotels consulted referred to the Visit England scheme and had achieved level 2 status within the NAS. This hotel was also affiliated with Make a Wish Foundation and Tourism for All and in this way, saw a large number of its accessible rooms filled through these affiliations. Although there is a fee to participate in the NAS, this hotel noted that this investment is profitable. Apart from this activity, no hotel mentioned any marketing activity they undertake to promote their accessible rooms.

Olympics

- None of the hotels consulted had any plans to extend their establishments prior for the purpose of 2012 Games, but some were undertaking refurbishment.
- One hotel visited had already received booking enquiries from wheelchair users for 2012.

8.3 Implications for BPG

Combining the evidence from the hotel consultation and the analysis of demand, results in the following implications for the BPG:

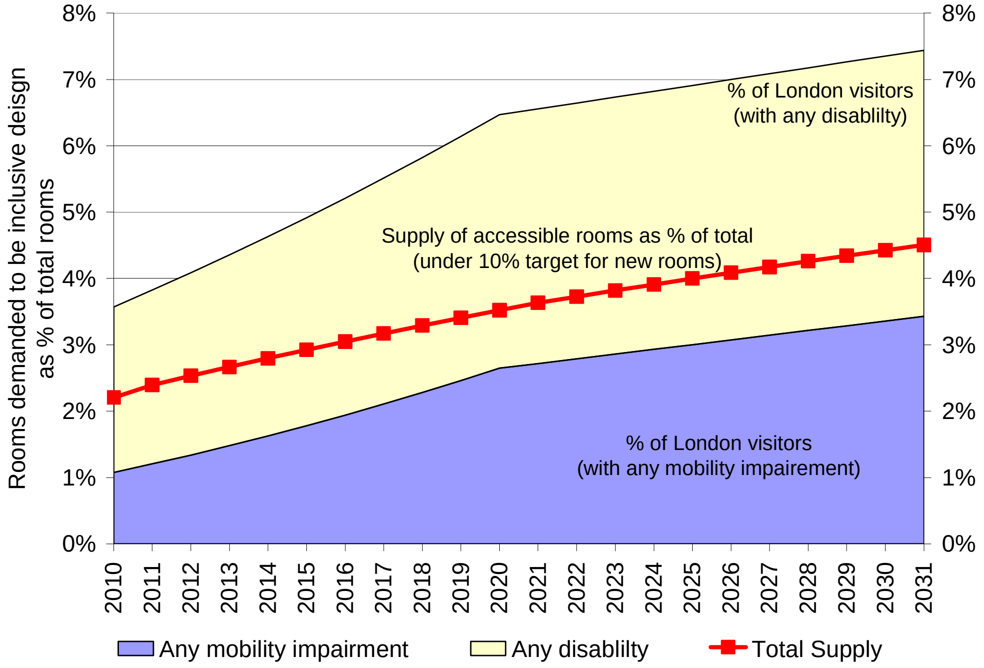
- **there is no agreed definition of an accessible room**, adopted as standard, by the industry. The BPG therefore develops this for new hotel developments in London.
- **there is no standard set of auxiliary aids** to support guests with specific needs. The BPG therefore outlines a possible set of auxiliary aids, which will be driven by principles of inclusive design.
- **the concept of using rooms in flexible ways is not understood.** The BPG therefore shows how adapting design in a standard room can support many uses beyond people with different impairments.
- **the number of hotels which have a policy on accessibility is low**. The larger chains had policies but these tend to be applied inconsistently or at the discretion of hotel managers. More consistency is needed and this will help manage expectations of all guests.
  - **allocation of rooms to disabled people is unclear**. Disabled people say accessible rooms are usually let to non-disabled guests and hoteliers report they receive few wheelchair using guests. This could mean the facilities available are not marketed well enough. One consultation suggested that hoteliers are cautious in promoting their facilities in case they receive more interest than they can manage and if they then need to provide further facilities to new guests. One other explanation is that hotels in London are busy and need to allocate rooms to non-disabled visitors, albeit on a last-let basis. If hotels recorded instances where disabled people tried unsuccessfully to book, they would have a clearer idea of the level of demand.
  - **booking systems used by hotels are not sophisticated enough** to allow disabled users to book particular rooms ahead of time. This is why some disabled users book rooms but then arrive to find that room is filled by a non-disabled guest. The BPG suggests ways of dealing with this.
  - **staff may have completed DDA training, but are not familiar with how some features of accessible rooms are used.**
  - **disabled visitor data is generally not collected** as a result.
- **current guidance (BS, PAS 88 etc) is often not familiar to local hotel managers, although this may have differed if interviews were undertaken with representatives at head offices.** To encourage the BPG to be used, the audience for these needs to be clear. The BPG is therefore aimed at developers, designers and planners for use at the planning application stage. Guidance for use by hotel managers has also been signposted in the BPG.
- **price of rooms drives expectations**. Where rooms are more expensive, there is a higher expectation of customer care for both disabled and non-disabled guests, and hotels tend to meet this expectation. Where the hotel is a budget hotel, all guests expect a moderate standard of comfort but are more flexible in what they perceive as acceptable. However, even in budget hotels, disabled people need a guarantee of the basic standards of accessibility that give them an equal experience to non-disabled people.

8.4 Accessible rooms to 2031

Under the assumption that 10% of new hotels rooms should be required to be accessible rooms, then the total stock of accessible rooms would reach 4.5% by 2031, as shown below. Appendix A also gives the numerical breakdown of demand and supply forecasts between 2011 and 2031.

Our model results suggest that an extra 3,000 accessible rooms will be required between 2011 and 2031 to meet demand (growing to just over 6,000 in 2031) from disabled people, as shown in Figure 7.5 below.

Figure 8.1: Scenarios on the percentage supply and demand for accessible rooms given a 10% policy for new rooms



Source: Grant Thornton

8.5 Conclusions

The analysis of the supply side suggests there is a mis-match between supply and demand for rooms and while marketing and provision of information is one aspect of this, there are others. Schemes such as Direct Enquiries and the NAS (which users say is too complicated and expensive) go some way to provide information but users suggest better information is needed, so these sources would benefit from signposting and in particular a single source of information.[36]

A recent article by the Spinal Injuries Association questioned the relative use of these schemes, particularly where standards and facilities vary[37]. They suggest some guidance asks hotels to go beyond making 'reasonable adjustments' and that a new

[36] Live Tourism, *Is London ready to welcome disabled visitors*?, 2010

[37] Spinal Injuries Association, *forward* newsletter, 2009

national scheme that has the support of all the national tourist boards should be adopted.

Another source of the mis-match is the inability of hotels to provide flexible and adaptable rooms to support guests with varying needs. Better policies are needed by hotel chains and independent hotels in providing facilities and in providing better customer care. The LDA and GLA have little influence in this area and therefore need to work alongside industry to encourage them to do this. Some industry-representative groups already exist, including those coordinated by DCMS and the British Hospitality Association. The LDA already uses such groups to promote these messages but further business support is required urgently to convince non-participating hotels to improve their services in this area.

We recommend that 10% of rooms in new hotels should be designated as accessible. Maintaining the current 5% policy, as required by current Building Regulations will not be sufficient to meet demand by 2031. However, ensuring supply meets demand is not the only action needed to ensure these are matched effectively. Good quality information on provision and flexible room provision needs to be available to potential disabled guests.

9 Implications for London Plan Policy

The implications for the policy and the London Plan in particular are around

- a requirement for 10% of hotel rooms to be accessible
- what sort of rooms the 10% should include
- Accessibility Management Plans
- the business model
- ensuring and delivering a SMART policy.

Each of these areas are discussed in greater detail below.

9.1 A 10% requirement.

Around 2% of the existing stock of hotel rooms in London is accessible, but evidence gathered suggests that this is inadequate for the following reasons:

- the stock does not meet the level of demand for accessible rooms, measured by the demand from people with 'any disability', currently estimated to be around 4%
- there is problem around disabled people identifying accessible rooms
- poor choice in type of accommodation compared to provision for non disabled visitors.

Hotels built since 1999 have been required by Building Regulations to ensure 5% of new rooms are built to be wheelchair accessible. This will clearly increase the supply of hotel rooms but will take a considerable time to raise the number to any significant degree, with only around 100 new rooms provided each year - the equivalent of raising the supply by just 0.1% each year. Clearly, a higher target is needed to ensure the number of accessible rooms is increased at a faster rate.

It could be argued that a higher benchmark of say 20% or 30% could be imposed to ensure that the stock of accessible rooms is reached in the next decade or so. For example, if 30% of new rooms are accessible, then the total supply of accessible rooms would reach 10% by around 2031. However, there is a significant risk that such a high percentage requirement could change the business model around hotel development endangering future hotel investment in London.

9.2 Accessible room definition

Under current guidelines, to obtain Building Consent 5% of rooms need to be designed in line with Building Regulations. However, we recommend hotels should provide a further 5% rooms to suit their customer base. While these additional rooms would need to be wheelchair accessible, they would not need to be identical but could be used to increase choice of amenities and facilities for disabled guests.

The BPG in the next chapter, sets out a recommended definition of an accessible rooms, building on definitions in current guidance.

9.3 Accessibility management plans

Given the evidence gathered, and the gaps highlighted, it is essential that hotels develop accessibility management plans (AMPs) which include:

- room booking policy to ensure reasonable availability is kept for disabled people
- information about the room and equipment reservation made possible through normal booking channel and through direct enquiry with hotel
- staff training and good customer care during booking, at arrival and during stay
- parking policy which facilitates guests with disabilities
- policy for booking and facilitating use of taxis and other public transport
- ensuring minibuses or shuttle buses provided by the hotel are accessible
- commitment to continuous improvement
- escape plans which respect dignity of guests.

9.4 The business model

Accessibility management plans together with a 10% room requirement could have an impact on the business model of hotel developers. Room sizes range from 30-35 square metres per room in a luxury hotel down to 10-12 square metres for a budget hotel. Budget hotels may therefore need to incorporate larger rooms than they would otherwise prefer which could impact on their profit margins.

Very simply, if 10% of accessible hotel rooms require 30% more space then the revenues for the hotel as a whole would fall by 3% (assuming no change in room tariffs). Whilst this is a relatively small change, if hotel operators operate on 5%-10% profit margins, then a 3% decrease in revenues translates into a more sizeable reduction in profits of 30%, assuming no additional business.

However, through good design, as set out in the BPG, the effect of the requirement on costs for hotels with larger average room sizes should be able to be minimised.

More extensive consultation would need to take place with developers to understand the magnitude of the effect in more detail.

9.5 Delivering the policy

It is essential that London Boroughs are able to sign up to the policy to ensure it is delivered.

The BPG and other guidance need to be well used and understood to ensure not just that the percentage figure is met but that rooms are well designed and the broader aims of Government and its agencies to promote inclusive design are taken into account.

This will mean closer working with the hotel industry by GLA/LDA both as part of, and outside, the planning process. One of the hotels visited as part of the consultation noted that they had been consulted many times by different agencies and they were not clear of the link between consultations. This same hotel asked whether there would be any central Government support to implement any new changes, support refurbishment or aid better room provision. Whilst this is not possible, the industry needs to be clearer of how they can meet their DDA obligations, deliver Government commitments, what support is available and who they should be in touch with.

The focus group of users was keen to ensure compliance with the principles of the BPG, and while the planning system is a further tool, compliance against DDA and Building Regulations needs to be better enforced.

9.6 Conclusion

The key conclusions around the policy on accessible rooms are:

- 10% of new hotel rooms should be accessible.
- accessible rooms should be flexible enough to encourage use by wheelchairs users and guests with other needs. All rooms should also meet improved design standards as well as equipment features and management support.
- GLA and LDA should continue to work alongside the hotel industry to monitor the impact of the room requirement on hotel development.
- enforcement of, and compliance with, BPG will be minimal unless concerted actions are taken. This needs to be considered, possibly jointly with Communities and Local Government, as lead planning Department.
- using the BPG, LDA and GLA should join up as agencies involved in supporting accessible tourism, especially to jointly developing the business case for hotels, which would allow hotels to engage with the issues in a more streamlined way.

10 Best Practice Guidance

The BPG (Appendix B):

- suggests a definition of an accessible hotel and accessible rooms
- summarises current practice in London and draws on experiences in Europe
- proposes the use of Accessibility Management Plans (AMPs) to complement the Design and Access Statement required as part of the planning application and specifies its contents
- provides practical examples of different room designs that build on existing guidance and can be part of a mixed provision of different rooms.

Each of these are covered in more detail below.

10.1 Accessible hotel and accessible rooms

Best practice suggestions for accessible hotels and accessible rooms include:

- adopting a clear and easily understandable layout to the hotel as a whole and to the room itself. This will help all visitors to comfortably use the hotel facilities and removes the need for unnecessary assistance
- offering equal standard of use in all public areas of the building, including restaurant tables, breakfast areas, business centre, etc
- making dignified provision for common toilets, changing facilities, refuge and evacuation arrangements
- arranging convenient parking to allow easy access to the premises
- choosing best quality finishes and fittings, in keeping with the style of the interior décor of the hotel, for example by rejecting hospital standard fittings and crude features
- providing choice of rooms type and location, with also the opportunity to have connecting rooms in a proportion of accessible rooms. Offer choice of bath or shower or bed type
- positioning furniture, switches, mirrors and other devices (such as kettle and cups) in obvious and rational places so that they can be easily found and safely used
- incorporating the small and well designed items that can make a big difference such as embossed room numbers, electronic card operated locks or stick holders at the restaurant tables
- having adequate storage for equipment and mobile furniture
- ensuring that information is available at all stages, pre-booking to arrival and that confirmation of arrangements made at time of booking is made
- training of all staff members in customer care for disabled visitors; personal and appropriate service, in line with what the hotel provides for all guests, is as important as technical solutions

- commitment to continuous improvement and encouragement of client feedback, particularly from the users of accessible rooms.

All accessible rooms should adhere to Part M of the Building Regulations and adopt best practice. It is suggested that all rooms provide the following, which should be considered during planning application and Building Consent procedures:

- wheelchair accessibility
- sufficient space around all doors: minimum 300mm leading edge to all doors
- bathroom layout that is rational and allows for wheelchair circulation
- well designed support rails by toilet and bath or shower, aiming for minimal visual intrusion
- level shower which is open or with easy to use door
- toilet and basin that are comfortable to use for all guests (whether disabled or not)
- switches, taps and other controls that are easy to operate
- multi-sensory alarm and emergency pulls
- double height spy-hole with wide angle viewer
- card activated locks.

In addition, it is suggested at early design stage, designers should consider and report in their DASs:

- a bed on feet to allow use of mobile hoists
- a choice of bed type, mattress and pillows
- wardrobes with adjustable or double height clothes rail
- a choice of essential equipment available at booking time: mobile hoists, bath board, shower or bath seats, etc.
- a choice of desirable equipment available at booking time: vibrating alarm clock, choice of TV remote control, etc.

10.2 Accessibility management plans

AMPs should be created as part of the planning stage and planning submission and regularly updated by hotels. In parallel, the BPG suggests there should also be a nominated individual to act as Accessibility coordinator who would be responsible for actions set out in the AMP.

10.3 Meeting the new policy - mixed provision

To promote inclusion and take-up by as many different customers as possible, we suggest that the provision should be for rooms of different types and sizes, with adaptability and flexible furniture integral to the design. Therefore, we suggest that all 10% will meet the requirements of Building Regulations and wheelchair accessibility should be provided to all common parts of the hotels as well as within these rooms.

It is recommended that the 10% accessible requirement for new rooms could be met in a variety of ways. Options could include for example:

- by making all 10% of accessible rooms designed according to Building Regulation guidance (modelled in the BPG as a Room Type B)
- in a budget hotel by providing 5% standard accessible rooms (Room Type B) and 5% smaller accessible rooms (Room Type A), with the latter suitable for wheelchair users but are more appropriate to those with a higher degree of independence. With appropriate management practices in place, the smaller accessible rooms could also be appropriate for a family with a child.
- in a luxury hotel by providing all 10% of accessible rooms in the larger size, where half of these meet full Building Regulations, while the other half (Room Type C) have only minimal additional fittings and can double up as a family room for 4.
- by adopting more mixed provision, with 5% of rooms being standard, and the rest by a combination of smaller and larger accessible bedrooms (Room Types A, B and C), all designed and managed for flexible use.

Examples of how these rooms could be designed are provided in the BPG as Room Types A, B and C. The development of alternative designs which adopt the same principles and improve the offer is also encouraged as an essential element of best practice.

10.4 Conclusion

The core content of the BPG demonstrates how a hotel developer can implement the new 10% policy and how best practice can be fostered through the planning system. It also includes suggestions like the AMP to integrate the physical and management aspects of accessibility. It also demonstrates the degree of flexibility possible in meeting the 10% requirement, the business benefits to the hotelier/developer of doing so and firmly grounds this within principles of inclusive design.

The draft BPG appended to this report needs to be consulted on in an appropriate way, given it supplementary planning guidance that supports the London Plan

11 Conclusions

11.1 Supply and demand

Significant barriers exist that restrict the ability of disabled people, and other people with specific access needs to visit London both as business and leisure visitors. Barriers exist in both the quantity and quality of hotel accommodation. Our research suggests that under the current 5% requirement there will be excess of demand for wheelchair accessible rooms over the 2011 to 2031 period.

To meet demand and Government objectives, including the Mayor's commitment to make the London Olympic and Paralympic Games the 'most accessible ever', there is a need to increase the supply of accessible hotel rooms in London. It is recommended that **10% of new hotel rooms should be accessible over the 2011-2031 period.** LOCOG have a target to deliver 3,500 accessible rooms by 2012. If this is achieved, it will boost overall provision and move the GLA closer to its target of just over 6,000 rooms by 2031.

11.2 Best Practice Guidance

The draft BPG demonstrates how such a 10% requirement can be met. In particular, that physical accessibility must be accompanied with policies to ensure that booking, arriving, staying and leaving the hotel is straightforward for all customers, including disabled ones. This may involve providing detailed information of room facilities prior to booking or having arrangements in place for parking.

Suggested room designs varying in room size are presented and demonstrate how the policy can be met through mixed provision. Room with good design rooms can accommodate users with different requirements, including older people and families.

Guidance is given on fixtures and fittings, and how these should be detailed within DASs as well as operating procedures which should be detailed in AMPs. **Terminology should be consistent between the BPG and any London plan policies.**

11.3 Working with industry

Government understands that it is necessary for hoteliers to understand the opportunities and potential profit that can be made. In London, where hotel demand is buoyant over the long term, there may be more intensive work needed with hoteliers to demonstrate the business case for investment. So closer working is needed with industry to build its understanding of the issues, to articulate the business case and to encourage more consistency in customer care standards throughout chains of hotels.

Understanding of current guidance by sales and general managers in hotels is patchy and aware of inclusive design principles was limited. Although the BPG is being prepared for a different audience, it is **recommended that further engagement with those responsible for building and room design is undertaken when the BPG is published.**

The LDA is already supporting hoteliers with its Open to All programme and should continue to promote this service. In addition, there remains some work to do around Design and Access Statements - research tells us there is little awareness among businesses of what these statements are, the need for them or their or value, yet 76% of consumers say access statements influence their decision to visit.[38] **There may be some benefit in a focused effort to improve understanding by business of these statements.**

In particular, the number of accessible rooms required at the time of the 2012 Olympic and Paralympic Games need to be delivered by hoteliers and Government has few levers to drive this. DCMS has begun work in this area, and LOCOG has announced IHG (in particular its Holiday Inn brand) as its commercial partner and was chosen as it offers a further opportunity to showcase the highest standards of inclusive design and it is envisaged new hotels will provide a best practice benchmark. The LDA and Tourism South East, among other Regional Development Agencies, have also produced case studies for businesses other than hotels to exploit potential opportunities[39].

11.4 Working with disabled people

DCMS and LDA are undertaking consultation with disabled people to better understand the barriers they face and their particular requirements on the wider subject of tourist facilities. Early findings show that NAS is seen as too complicated and expensive.[40]

The provision of good information remains key and the LDA, Visit London and Visit England should encourage a single scheme to be supported (NAS or Direct Enquiries). Lack of consistency in standards confuses the landscape and reduces the effectiveness of signposting.

11.5 Improving quality of data

Better data is needed on the number of disabled visitors (or visitors with other specific access needs) staying in London hotels to help build the business case for hoteliers around accessible rooms.

The UKTS is making good progress in doing this. Whilst there is little data currently available on the numbers of disabled people visiting London (either domestically or abroad), the UKTS now includes a question on travel by disabled people[41].

[38] Live Tourism, *Is London ready to welcome disabled visitors*?, 2010
[39] LDA's Tourism Business Support Programme and Tourism South East video case studies and podcasts available at http://www.industry.visitsoutheastengland.com/site/accessibility
[40] Live Tourism, *Is London ready to welcome disabled visitors*?, 2010
[41] The first results will be available in November 2009 and similar steps are being planned for the IPS and LVS.

11.6 The planning system

In relation to the planning system to affect change in the provision of accessible rooms, there should be more explicit reference than simply relying on the requirements of the Building Regulations. It is recommended that accessibility should be promoted in line with national policy, draft replacement London Plan policy and BPG. Without compliance by hoteliers, however, the BPG will not be effective.

Compliance with planning systems requirements (and the new London Plan policies) and mechanisms to encourage compliance should be explored with Communities and Local Government as the lead planning department.

Other formats and languages

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Chinese

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Hindi

यदि आप इस दस्तावेज की प्रति अपनी भाषा में चाहते हैं, तो कृपया निम्नलिखित नंबर पर फोन करें अथवा नीचे दिये गये पते पर संपर्क करें

Vietnamese

Nếu bạn muốn có văn bản tài liệu này bằng ngôn ngữ của mình, hãy liên hệ theo số điện thoại hoặc địa chỉ dưới đây.

Bengali

আপনি যদি আপনার ভাষায় এই দলিলের প্রতিলিপি (কপি) চান, তা হলে নীচের ফোন্ নম্বরে বা ঠিকানায় অনুগ্রহ করে যোগাযোগ করুন।

Greek

Αν θέλετε να αποκτήσετε αντίγραφο του παρόντος εγγράφου στη δική σας γλώσσα, παρακαλείστε να επικοινωνήσετε τηλεφωνικά στον αριθμό αυτό ή ταχυ-δρομικά στην παρακάτω διεύθυνση.

Urdu

اگر آپ اِس دستاویز کی نقل اپنی زبان میں چاھتے ھیں، تو براہ کرم نیچے دئے گئے نمبر پر فون کریں یا دیئے گئے پتے پر رابطہ کریں

Turkish

Bu belgenin kendi dilinizde hazırlanmış bir nüshasını edinmek için, lütfen aşağıdaki telefon numarasını arayınız veya adrese başvurunuz.

Arabic

إذا أردت نسخة من هذه الوثيقة بلغتك، يرجى الاتصال برقم الهاتف أو مراسلة العنوان أدناه

Punjabi

ਜੇ ਤੁਹਾਨੂੰ ਇਸ ਦਸਤਾਵੇਜ਼ ਦੀ ਕਾਪੀ ਤੁਹਾਡੀ ਆਪਣੀ ਭਾਸ਼ਾ ਵਿਚ ਚਾਹੀਦੀ ਹੈ, ਤਾਂ ਹੇਠ ਲਿਖੇ ਨੰਬਰ 'ਤੇ ਫ਼ੋਨ ਕਰੋ ਜਾਂ ਹੇਠ ਲਿਖੇ ਪਤੇ 'ਤੇ ਰਾਬਤਾ ਕਰੋ:

Gujarati

જો તમને આ દસ્તાવેજની નકલ તમારી ભાષામાં જોઈતી હોય તો, કૃપા કરી આપેલ નંબર ઉપર ફોન કરો અથવા નીચેના સરનામે સંપર્ક સાધો.