

Mr Martin McConaghy comments

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I wish lodge my support for policy D3 and policy D11. However, I also consider that the plan misses an important opportunity with regards to its guidance on policy D3. I believe the following guidance note to policy D11 is extremely helpful:

*“**Fire statements** should be submitted with all major development proposals. These should be produced by a third-party independent suitably-qualified assessor. This should be a qualified engineer with relevant experience in fire safety, such as a chartered engineer registered with the Engineering Council by the Institution of Fire Engineers. Planning departments should work with and be assisted by suitably qualified and experienced officers within borough building control departments and/or the London Fire Brigade, in the evaluation of these statements.”*

My understanding of this is that it will encourage the use of qualified specialists both as part of the design team and the local authorities granting planning consent. This two fold approach of applying competent expertise is essential to hitting the ‘highest standards’ and is welcomed.

I note with some disappointment that policy D3, which requires the ‘highest’ standards of inclusive design does not go so far as to encourage the use of qualified specialists, either as part of the design team or within local authorities. This is a missed opportunity to ensure the expertise necessary to deliver the policy is in place.

It is widely accepted that delivery of inclusive environments needs specialist expertise both within the design team and within local authorities. The evidence gathered by the House of Commons Women and Equalities Committee, as set out in the report 'Building for Equality: Disability and the Built Environment', demonstrates the need for specialist with paragraph 77 and the Annexes from outreach sessions highlighting the issue.

The need for specialist has long been established with publications such as 'Planning and Access for Disabled People', by the ODPM, Planning, buildings, streets and disability equality, published by the former DRC both encouraging appointment of Access Officers within Local Authorities. Other publications such as the new BS8300, the now dated but still relevant 'Inclusive Projects' publication all make reference to the need for specialists. It is also clear from the government led projects that the wider industry is not currently capable of delivering the 'highest' standards without the support of specialists and hence the need for the recent Ministerial Action Plan on Inclusive Environments and the Built Environment Professional Education Project, both of which will take many years to have an impact on development proposals.

The existing SPG relevant to policy D3 recognises the need for specialists by making reference to the use of members of the National Register of Access Consultants (NRAC). The NRAC is the only body in the UK which accredits professionals with expertise in this area. It was established with central government backing to ensure that the public, developers and design teams had access to a register of suitably qualified competent professionals.

I would therefore ask that you add paragraph to the guidance on policy D3 to make it clear that the plan encourages local authorities and design teams to make use of suitably qualified specialists, such as members of the National Register of Access Consultants.