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**From:**  
**Sent:**  
**To:**  
**Cc:**  
**Subject:**

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Please ensure that properly trained people, including those DBS checked are used in terms of dealing with hoarding. And follow the suggestions below in addition to those previously mentioned! This needs to be added into your London plan (Housing, Standards, Mental Health, and other sections (including even Historic Buildings (Royal Collections etc. could be hoards without the proper support...)).

----- Forwarded message -----

**From:** Adrian Whyatt  
**Date:** 2 March 2018 at 12:58  
**Subject:** Re: Fw: 'New Draft London Plan' - original deadline for comment is Friday 2nd March 2018. Fwd includes Hoarding and the London Plan. Was Emergency AOB item for AGM Tomorrow "New Draft London Plan" Not available in Easy Words and Pictures Format, BSL or...  
**To:**  
...

Dear

....  
,

They are of help. I trust I can add them in, anonymising your contact details. Especially useful. DBS checks. Will have to get back at 3pm or so now as going (bit late) to another class until then).

Yours

Adrian

On 2 March 2018 at 12:19, wrote:

Hi Adrian,

Although I don't live in London I do have a number of friends, with hoarding problems, who do and who may therefore be affected by any changes which can be brought about.

I have major concerns over the way councils, environmental health and social services approach hoarding. They largely seem to assume that hoarders are either dirty people or are mentally incapable, which clearly is far from the truth. Consequently, property clearance, or even eviction, is all too often the way they deal with it. My own view is that in every borough there should be cross department teams, which must include the Community Healthcare Team (or whatever they call them now). The first line of action should always be for a proper health assessment (including mental health) to be carried out, if appropriate including the person's GP. Then, if underlying physical or

mental health issues are identified, appropriate treatment must be offered. Local Government organisations also need to be made aware that hoarders are often petrified of them and will not answer the phone to them, or open letters, for fear of what might happen. It is usually not that they don't want to cooperate, but they want help. Instead they often face fear and anxiety.

Property clearance should always be the absolute last recourse. Even then, local government bodies who do this must be held accountable. I have heard anecdotal accounts, which obviously I cannot confirm, of personal possessions and valuables being taken during clearances. Where clearances have to be done it must be in a controlled way, using only DBS checked staff who have been properly trained or, preferably, reputable decluttering companies who are experienced in working with vulnerable people.

Hope these thoughts are of some help.

All the best,

.....

On 1 Mar 2018 9:51 pm, Jane Hall [REDACTED] wrote:

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Dear Jane,

Thanks for your text, received this afternoon.

This is as far as I've got. It transpires from a meeting yesterday (on Deaf (i.e. British Sign Language (BSL) (and small "d" deaf (hearing loss and other hearing impairment) Disability Hate Crime, that some organisations and individuals are being inundated with requests to participate in too many Greater London Authority (GLA) and/or London Mayoral Strategy consultations of one sort or another. Others, that they are being consistently left out of the loop. This includes people like me and the organisations I have represented who were previously "in the loop" on a number of things (though never everything we wanted to be), but less and less so since the death of Dave Morris, the Mayor of London's Senior Disability Adviser in 2010.

As far as Hoarding is concerned, according to the Safeguarding Training I did today as a peer trainer for West London Mental Health Trust (WLMHT), there are 10 categories of Abuse of Adults to consider

under the Care Act 2014. The 10th Category is "Self-Neglect" (added in April 2015) which includes not just persistent failure to wash or otherwise look after oneself, but also hoarding.

Neglect let alone self-neglect, is not mentioned in the draft London Plan, never mind Hoarding, or any kind of Hoarding Strategy, nor the "London Hoarding Task Force" coordinated by Peabody and which you and I and others have attended.

The plan needs revision to include hoarding properly, including life long review and support as required, in my view (in line with what I've understood from our meetings).

Also, as you will see, my Unite Community Branch AGM this evening, at which I hoped to get more comments, has been postponed to March 15th, due to the weather, and for this reason alone, let alone all of the above and below, an extension of the consultation on this Draft Plan is needed. And if not granted by the GLA, the plan Inspector should use their power to compel them to re-do it.

Please let me know what you all feel needs to be added to or altered from these submissions. In the meantime they are, except where otherwise stated, submissions in a personal capacity. I can't guarantee to look at anything after about 3pm tomorrow, and even that depends upon transport and connectivity (online as well) very much affected by the big freeze!

Yours with best wishes,

Adrian Whyatt

I understand. Unfortunately response to this is due in tomorrow. Will request extension. And for plan to be sent back by the examiner for redrafting in the absence of an extension.

The UC Branch AGM meeting now cancelled due to adverse weather conditions. RG

Sent from my iPhone

On 28 Feb 2018, at 18:00, wrote:

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Greater time is needed. Please note the defects in the Draft London Plan. We need to nationalise the British Standards Institution (BSI) as part of the response and to set it free.

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None of the Draft impact assessments have an Easy Read version. No British Sign Language (BSL) or Makaton versions either of the Draft impact assessments.

So, the consultation remains inaccessible (and contrary to the Equality Act as well as the UN Disability Convention, amongst other things), for people who need these formats.

It therefore needs to be re-run or at least extended until the full length of the current consultation after full information for those who need these and other formats available to them has been produced, online and in hard copy and effectively distributed.

I now attach the Easy Read version, which runs to just 21 pages.

Yours with thanks,

On 27 February 2018 at 19:55, wrote:

Re: "New Draft London Plan" Not available in Easy Words and Pictures Format, BSL or Makaton and therefore the consultation time must be extended as it makes it impossible for many disabled people and their organisations to comment (especially those with learning difficulties (global and/or specific) was Fwd: Just Space: London Plan; HELP on safety and standards, disability (DESIGN chapter)

In addition to making the comments below which Just Space is free to comment on and build on, the failure to make the consultation available at all in these formats is illegal under domestic (customary, common and statutory law as well as jurisprudence), European Union, European Convention on Human Rights, and international law (e.g. Marrakesh Treaty) and global law (especially the UN Convention on the Rights of Persons with Disabilities).

For many people with learning difficulties (as well as many stroke and other brain injury survivors) Easy Words and Pictures is essential.

And, it is easier for everyone and therefore must be made the default format!

Yours

[REDACTED]

Dear Michael et al,

I think this document, called LARMBuild5, produced by the London Autistic Rights Movement (LARM), circa 2011, might be useful. It is an agreed access position paper, and was very much in the context of the BSI's now mothballed Neurodiversity, Cognitive Impairment and Access to the Built Environment Task Force. Some key points in terms of buildings - make dimmer-increaser switches mandatory. Pastel colours, matt not gloss, flexiplan or cellular environments, not open plan are a few of the recommendations which come to mind. Avoid bright white (also on screens). Follow the principles of universal design (default design will be low arousal). Despite the title it also includes much else besides about It can be downloaded as well via this link:

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I'm attaching it and giving the link to the Facebook Group I run (and post copies of things into (anyone can join (no requests will be refused), which is the Disability Rights Commission (DRC) Neurodiversity and Autism Action Group Legacy Group, web address: [https://www.facebook.com/groups/1163492267101140/?ref=group\\_header](https://www.facebook.com/groups/1163492267101140/?ref=group_header). I did this because the DRC had buried our work in its library in 2007, probably because these, the most radical and only neurodivergent inclusive documents ever to be approved by any official human rights body in the world, were far too radical for their liking, and as it had been repeatedly submitted to public consultations, it

can be considered to be long in the public domain, if previously effectively inaccessible online. It includes the Disabled People's Charter of Essential Needs to be Met, which though just a few pages long, builds on the 12 Needs of Independent Living (of the Southampton Centre for Independent Living (SCIL), and adds considerably to them.

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From the hoarders' perspective, lifelong and continuous support is often needed, including safe external storage spaces.

Yours sincerely and with best wishes,

Dear all,

Thank you for this. I will give a full response to it this evening. However, preliminary observations are that they rely on BS8300 as revised. This must be made free of charge. Also, by their own admission, despite very large (running into the hundreds of pages with background documents) submissions by me, they still maintain that it does not cover neurodiversity and neurological conditions sufficiently. Which means it is not good enough to rely on by its own admission! This was stated at the meeting in City Hall.

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Yours,

Adrian

Dear Adrian

Your contribution on Saturday was invaluable and added a kind of expertise we otherwise lack.

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..... end .....

[Redacted content]

<the-london-plan-easy-read-lo-res\_v2pages.pdf>

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**Cc:**  
**Subject:**

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Yours with best wishes,

Adrian Whyatt

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**From:** Adrian Whyatt <  
**Date:** 1 March 2018 at 13:13  
**Subject:** Re: Emergency AOB item for AGM Tomorrow "New Draft London Plan" Not available in Easy Words and Pictures Format, BSL or Makaton and therefore the consultation time must be extended as it makes it impossible for many disabled people and their organisations to comment (especially those with learning difficulties (global and/or specific) was Fwd: Just Space: London Plan; HELP on safety and standards, disability (DESIGN chapter)  
**To:** Raj Gill <>

I understand. Unfortunately response to this is due in tomorrow. Will request extension. And for plan to be sent back by the examiner for redrafting in the absence of an extension.

On Thu, 1 Mar 2018, 12:53 rgill, <> wrote:

The UC Branch AGM meeting now cancelled due to adverse weather conditions. RG

Sent from my iPhone

On 28 Feb 2018, at 18:00, Adrian Whyatt <> wrote:

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Greater time is needed. Please note the defects in the Draft London Plan. We need to nationalise the British Standards Institution (BSI) as part of the response and to set it free.

Plan inaccessible!

----- Forwarded message -----

**From:** Adrian Whyatt <>  
**Date:** 28 February 2018 at 17:57  
**Subject:** Re: "New Draft London Plan" Not available in Easy Words and Pictures Format, BSL or Makaton and therefore the consultation time must be extended as it makes it impossible for many disabled people and their organisations to comment (especially those with learning difficulties (global and/or specific) was Fwd: Just Space: London Plan; HELP on safety and standards, disability (DESIGN chapter)  
**To:** [londonplan@london.gov.uk](mailto:londonplan@london.gov.uk)

C

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Yours with thanks,

Adrian Whyatt (in same capacity as previous emails)

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Yours

Adrian Whyatt (in same capacity as below, except also as an individual People First member)

----- Forwarded message -----

From: **Adrian Whyatt** <>

Date: 27 February 2018 at 19:30

Subject: Re: Just Space: London Plan; HELP on safety and standards, disability (DESIGN chapter)

To: "Edwards, Michael" <

Dear Michael et al,

I think this document, called LARMBuild5, produced by the London Autistic Rights Movement (LARM), circa 2011, might be useful. It is an agreed access position paper, and was very much in the context of the BSI's now mothballed Neurodiversity, Cognitive Impairment and Access to the Built Environment Task Force. Some key points in terms of buildings - make dimmer-increaser switches mandatory. Pastel colours, matt not gloss, flexiplan or cellular environments, not open plan are a few of the recommendations which come to mind. Avoid bright white (also on screens). Follow the principles of universal design (default design will be low arousal). Despite the title it also includes much else besides about It can be downloaded as well via this link:

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Yours,

Adrian

On 27 February 2018 at 16:44, Edwards, Michael <> wrote:

Dear Adrian

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[REDACTED]

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**From:**  
**Sent:**  
**To:**  
**Cc:**

**Subject:**

**Follow Up Flag:** Follow up  
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Dear Joe,

Unfortunately this does not answer all the points made concerning the real accessibility of the consultation (which I will try to re-forward to you, notably about the need for the Easy Word and Pictures version to be the default version, for this to have been co-produced in conjunction with people with learning difficulties and other disabled people and others who benefit from this format (e.g. people whose first language is not English, who have been unable to access a full education and to develop a full enough vocabulary to follow a non-Easy Read "jargon" version, such as you now have as your main version). The Easy Read version is very much attenuated and minimised.

This is before considering issues of capacity and co-ordination of this and other consultations. And the impact of the exceptional weather in forcing the cancellation of some meetings at which organisations could formulate their response, such as Unite the Union's West London Community Branch AGM, which had to be postponed last night because of safety considerations due to the weather to March 15th 2018 and the late distribution (via cascading) to many organisations and individuals of this consultation.

All the comments made still stand.

But, both more time and extending the consultation is required under all the circumstances.

Take time to get things right!

Yours with thanks,

Adrian Whyatt

On 2 March 2018 at 13:33, Londonplan <[Londonplan@london.gov.uk](mailto:Londonplan@london.gov.uk)> wrote:

Dear Adrian

Thank you very much for your correspondence on the format and accessibility of the draft London Plan, the consultation period for which has been open since 1<sup>st</sup> December and will close today at 5pm.

The draft London Plan (printed and online versions) contain the following text:

For a large print, Braille, disc, sign language video or audio-tape version of this document, or if you would like a summary of this document in your language please contact us at this address:

[london.gov.uk](http://london.gov.uk)

We have responded to all requests received for alternative formats of the draft London Plan and associated documentation throughout the consultation period to ensure that as many people as possible have been able to participate and feed into the process.

Thank you again for your views and I do hope the above information helps to reassure you.

Yours

Joe

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On 27 February 2018 at 16:56, Adrian Whyatt <> wrote:

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Thank you for this. I will give a full response to it this evening. However, preliminary observations are that they rely on BS8300 as revised. This must be made free of charge. Also, by their own admission, despite very large (running into the hundreds of pages with background documents) submissions by me, they still maintain that it does not cover neurodiversity and neurological conditions sufficiently. Which means it is not good enough to rely on by its own admission! This was stated at the meeting in City Hall.

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Yours,

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On 27 February 2018 at 16:44, Edwards, Michael <> wrote:

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..... end .....

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Cc. Also London Plan, Raj Gill, Branch Secretary, Unite the Union West London Community Branch, Andrew Lee, CEO (National) People First amongst others for consideration.

Dear Michael,

It is far from the first time this has happened with a consultation. The unspoken or hidden agenda is to get those who need to use Easy Read - (many people with lifelong learning differences including difficulties, people with all manner of neurological conditions and communication differences (including impairments (ranging from some types of dyslexia through to dementia and taking in autism, and brain injury including stroke, as well as people with a huge range of long-term including degenerative conditions) as well as those with limited English vocabulary (sometimes due to lack of educational attainment in this regard often due to lack of opportunity, and not any impairment as such, as well as some whose first language is not English) - just to comply with what is being planned.

At the other extreme, much more rarely, there have been cases in which vast documents have been "translated" into Easy Read, resulting in documents running to hundreds of pages, or even thousands and which nobody then has the time to read!

The solution is to make the Easy Read (not the "jargon" version) the default version of all consultations and to co-produce the documents in the first place with organisations of people with learning difficulties, valuing their input at least equally in financial terms. This does include what the organisations and individuals are paid, including any support workers, and does involve ALL (and I stress ALL) relevant documents.

Though this might sound more expensive, and will take more time, it is most likely to produce better results. As the late and utterly brilliant Dave Morris (Senior Disability Adviser to Mayors Livingstone and Johnson (who sadly died in 2010 suddenly (respiratory difficulties which may have been linked to the Icelandic volcano Eyjafjallajökull's eruption), frequently liked to point out, a local council appointed someone with learning difficulties to go through, with support needed, all the forms the public had to use, and other documents to make them simpler and easier to understand, giving the person a top salary, commensurate with their responsibilities. This could be said to be, if you like (in my own words, not those of Dave Morris as such, an example of someone having a natural talent of "Keeping it Simple Sir" (KISS) actually, for a change, being allowed to put it into action. This resulted in such increased rates of customer satisfaction, that the person with learning difficulties got huge bonuses, resulting in jealousy from the other members of the senior management team!

We need an approach like this. Over 90% of people with learning difficulties (according to frequently quoted statistics (probably shorthand for global learning difficulties with onset before the age of 18 (often defined as having a global or overall average IQ Test score of below 70 by the likes of the World Health Organisation (WHO) for obscure reasons which have something to do with statistical standard deviation scores) are not in full or part-time work. Such an approach could obviously create lost of work for them and their organisations, also going some way to meeting agreed Government targets (which enjoy cross-party support amongst the Opposition parties) to reduce the Disability Employment Gap.

People with other disabilities and from other disadvantaged groups should also be paid for their involvement in the initial default Easy Read drafts (e.g ensuring a dyslexia-friendly low contrast default background and use of fonts) for much the same reasons. This also creates a whole virtuous circle of benefit and crime reduction and increased wellbeing as direct and indirect consequences and ensures well considered short, medium and long-term planning.

Yours

Adrian

P.S, Have to go now

On 1 March 2018 at 19:37, Edwards, Michael < wrote:

Dear Adrian

I only just opened this (sent last night) because it had gone to my spam/junk. I have removed GLA from the list of addressees.

I'm glad you sent it to them because your demand needs to come from you with your expertise and standing, I guess.

Do you regard the easy read version as at all valid? In my view it is a complete insult! Ducks all the ISSUES.

Best wishes, Michael

On 28 Feb 2018, at 17:57, Adrian Whyatt <> wrote:

I stand corrected, in part. The Draft London Plan is available in Easy Read format. But, this misses some key details, such as the use of BS8300. The "jargon" (non-Easy Read version does not refer to an Easy Read version being available).

No copies that I could find (and I was the first one there) at the GLA event in Easy Read or at the Just Space event.

None of the Draft impact assessments have an Easy Read version. No British Sign Language (BSL) or Makaton versions either of the Draft impact assessments.

So, the consultation remains inaccessible (and contrary to the Equality Act as well as the UN Disability Convention, amongst other things),for people who need these formats.

It therefore needs to be re-run or at least extended until the full length of the current consultation after full information for those who need these and other formats available to them has been produced, online and in hard copy and effectively distributed.

I now attach the Easy Read version, which runs to just 21 pages.

Yours with thanks,

Adrian Whyatt (in same capacity as previous emails)

On 27 February 2018 at 19:55, Adrian Whyatt <a> wrote:

Re: "New Draft London Plan" Not available in Easy Words and Pictures Format, BSL or Makaton and therefore the consultation time must be extended as it makes it impossible for many disabled people and their organisations to comment (especially those with learning difficulties (global and/or specific) was Fwd: Just Space: London Plan; HELP on safety and standards, disability (DESIGN chapter)

In addition to making the comments below which Just Space is free to comment on and build on, the failure to make the consultation available at all in these formats is illegal under domestic (customary, common and statutory law as well as jurisprudence) , European Union, European Convention on Human Rights, and international law (e.g. Marrakesh Treaty) and global law (especially the UN Convention on the Rights of Persons with Disabilities).

For many people with learning difficulties (as well as many stroke and other brain injury survivors) Easy Words and Pictures is essential.

And, it is easier for everyone and therefore must be made the default format!

Yours

Adrian Whyatt (in same capacity as below, except also as an individual People First member)

----- Forwarded message -----

From: **Adrian Whyatt** <>

Date: 27 February 2018 at 19:30

Subject: Re: Just Space: London Plan; HELP on safety and standards, disability (DESIGN chapter)

To: "Edwards, Michael" <

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Dear Michael et al,

I think this document, called LARMBuild5, produced by the London Autistic Rights Movement (LARM), circa 2011, might be useful. It is an agreed access position paper, and was very much in the context of the BSI's now mothballed Neurodiversity, Cognitive Impairment and Access to the Built Environment Task Force. Some key points in terms of buildings - make dimmer-increaser switches mandatory. Pastel colours, matt not gloss, flexiplan or cellular environments, not open plan are a few of the recommendations which come to mind. Avoid bright white (also on screens). Follow the principles of universal design (default design will be low arousal). Despite the title it also includes much else besides about It can be downloaded as well via this link:

[https://lookaside.fsbx.com/file/LARMBUILD5%5B1%5D.rtf?token=AWxqopCtW25zzZn7T-32AbNPI9q1\\_f3-T\\_KYefIQCSYQ\\_M4VR1b5-](https://lookaside.fsbx.com/file/LARMBUILD5%5B1%5D.rtf?token=AWxqopCtW25zzZn7T-32AbNPI9q1_f3-T_KYefIQCSYQ_M4VR1b5-)



[4hMyNbbODgJhd DexCJM2EkZevNMZUvSdwNItN3fyr263o5PQ9PPeTwf1dU92UC 1CE6-991isEjM9a834EU7pu9G keMpOMR6ED2SEyLfpVdomEiidzzTJhfnmLzBvN0zYfsSZd9CVO-g](https://www.facebook.com/groups/1163492267101140/?ref=group_header)

I'm attaching it and giving the link to the Facebook Group I run (and post copies of things into (anyone can join (no requests will be refused), which is the Disability Rights Commission (DRC) Neurodiversity and Autism Action Group Legacy Group, web address: [https://www.facebook.com/groups/1163492267101140/?ref=group\\_header](https://www.facebook.com/groups/1163492267101140/?ref=group_header). I did this because the DRC had buried our work in its library in 2007, probably because these, the most radical and only neurodivergent inclusive documents ever to be approved by any official human rights body in the world, were far too radical for their liking, and as it had been repeatedly submitted to public consultations, it can be considered to be long in the public domain, if previously effectively inaccessible online. It includes the Disabled People's Charter of Essential Needs to be Met, which though just a few pages long, builds on the 12 Needs of Independent Living (of the Southampton Centre for Independent Living (SCIL), and adds considerably to them.

Also posted which I include as longer background papers, all uploaded to this Facebook Group are submissions to last summer's British Standards' Institution (BSI) Consultation on BS8300 revision. These are very lengthy, I'm afraid, but provide considerably more detail, and include a compendium of submissions to related matters as part of the background. This includes submissions to the Woman and Equalities Parliamentary Committee enquiry into Accessibility and the Built Environment.

From the hoarders' perspective, lifelong and continuous support is often needed, including safe external storage spaces.

Yours sincerely and with best wishes,

Adrian Whyatt, Chair, London Autistic Rights' Movement (LARM) (official capacity); Chair, Greater London Action on Disability (GLAD); Liaison Officer, Hoarding Peer Support Group (HPSG) (both personal capacities)

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..... end .....

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<the-london-plan-easy-read-lo-res\_v2pages.pdf>

..... end .....

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On the blog: final text on the London density matrix [michaeledwards.org.uk](https://michaeledwards.org.uk)

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