



CONSULTATION STATEMENT Draft Access for All SPD

This consultation statement is required in connection with the preparation of Harrow’s Access for All Supplementary Planning Document. It demonstrates whom and how the Council has engaged in the early stages of preparing the SPD and its accompanying Sustainability Appraisal.

The statement contains the following information:

- i) the names of the organisations whom the Council consulted in connection with the preparation of the SPD;
- ii) how those organisations were consulted;
- iii) a summary of the main issues raised in those consultations; and
- iv) how those issues have been addressed in the SPD.

Initial consultation on the draft Access for All SPD took place over a six-week period in August and September 2005.

The following organisations were sent a copy of and invited to comment on the draft SPD and Sustainability Appraisal (SA) Scoping Report:

Shopmobility	Disability Rights Commission
Harrow Association of Voluntary Services	National Centre for Independent Living
Access Association	Government Office for London
Disabled Foundation	Greater London Authority
Harrow Crossroads	Environment Agency
Harrow Association of Disabled People	English Nature
Harrow Carers Centre	Countryside Agency
Harrow Early Years and Childcare Services	English Heritage
Harrow Leisure Centre	London Borough of Hillingdon
Harrow Mencap	London Borough of Ealing
Mind in Harrow	London Borough of Hounslow
MS Society	London Borough of Brent
Community Link Up	London Borough of Hammersmith & Fulham
Greater London Action on Disability	London Borough of Barnet
British Council of Disabled People	Hertsmere Borough Council
Royal National Institute for the Blind	Three Rivers District Council
Royal National Institute for the Deaf	Hertfordshire County Council
People First	Commission for Architecture and the Built Environment

The draft SPD and SA Scoping Report were also placed on the Council's website (see notice below) and made available for inspection at Planning Reception.

Access for All Supplementary Planning Document (SPD) and accompanying Sustainability Appraisal (SA) Scoping Report (August)

The Council is currently producing an Access for All SPD which will elaborate upon existing access-related policies in the adopted Harrow Unitary Development Plan (UDP). An important stage in producing the SPD is securing early community and stakeholder engagement. You are invited to comment on the draft document and its supporting Sustainability Appraisal report. Comments should be received no later than 4.30pm on Wednesday 14th September 2005.

Copies of the Access for [All Draft SPD](#) (full-colour and [text-only PDFs](#)) and the accompanying [Sustainability Appraisal](#) are available.

Copies are also available for inspection at Planning Reception, Garden House, 5 St. John's Road, Harrow, HA1 2EE. Alternatively you can request a copy from either Ali Kashmiri on 020 8736 6611 or Sukhpreet Khull on 020 8736 6086, or by e-mail ali.kashmiri@harrow.gov.uk.

In addition to the external consultation process, the draft SPD and SA Scoping Report were also circulated to relevant internal Council staff inviting comments relating to their particular areas of expertise.

Summary of the main issues raised:

Representation Number	Individual/Organisation	Summary of representation/issue	How the issues raised have been addressed in the SPD
STATUTORY CONSULTATION AUTHORITIES REPRESENTATIONS			
1	Christopher Kratz-Countryside Agency	<ul style="list-style-type: none"> The Countryside Agency are concerned with public open spaces and rural areas. They suggested the protection and retention of these sites through identification of these as baseline information and indicators to monitor any changes in these. 	<ul style="list-style-type: none"> The Countryside Agency's suggestions are incorporated and addressed in the Council's Overarching Sustainability Appraisal (SA) Scoping Report which will apply to the LDF and all its documents as a whole. The Overarching SA is intended to also cover this SPD. Access to public open spaces and rural areas is important for breaking down social exclusion and making such sites accessible to all. The retention and safeguarding of such sites is an important issue which the Council will consider in the core strategy DPD.
2	Katie Wilkinson-Environment Agency	<ul style="list-style-type: none"> Environment Agency has no comments on these proposals. 	<ul style="list-style-type: none"> No issues to address.
EXTERNAL ORGANISATIONS & PEOPLE REPRESENTATIONS			
3	Peter Durrans-Sport England	<ul style="list-style-type: none"> Document applauded for being attractively designed and broad in its coverage. The SPD should also include a mention to the need to promote disabled access to other sports facilities including sports halls, pavilions, stadia, synthetic and hard surfaced sports pitches and tennis courts so that disabled people can enjoy participation in sports in addition to the access to swimming pools, 	<ul style="list-style-type: none"> An additional paragraph has been written to reflect the Sport England recommendation on page 48. Contact details of Sport England's website and Design Guidance "Access for Disabled People" have been added to page 48.

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		gyms and keep fit areas already mentioned. Suggest the specific reference to Sport England's detailed Design Guidance Note Access for Disabled People (produced with the support of the English Federation of Disability Sport).	
4	Steven Lee-Resident	<ul style="list-style-type: none"> Content of the document is applauded, however the layout is criticised for being difficult to follow and the photographs overlap. Some diagrams don't have any explanations and some don't make sense because they are in the wrong place. 	<ul style="list-style-type: none"> Points have been taken on board. The document has been further developed and formatted so that the correct diagrams follow the text. Photographs in the 'Keep Fit Areas & Gyms' section have been resized and formatted not to overlap (page 48). All photographs have been appropriately annotated to describe each picture.
5	Pippa Moreton-Corporation of London	<ul style="list-style-type: none"> Colour-contrast considerations to be made as the blue background and black text are difficult to read as a visually impaired person. The Royal National Institute for the Blind (RNIB) clear print guidelines need to be adhered to. Diagrams need to use the correct colours to emphasise the contrasting (manifestation) strips on the glass doors on page 21 (now page 22). The building name and number should be at eye level on entry to a building on page 8. Advice is provided on access routes and signage. The correct colour needs to be used in the diagrams for blue badges as it may 	<ul style="list-style-type: none"> Work is under way to rectify the layout and diagrammatic issues raised. Access Officer has checked against RNIB's Clear Print Guidelines. Colours corrected on page 22. The blue background has been changed with an aqua-marine blue colour. The section 'Access Routes & Surrounding' relates to the overall layout, and not to the detailed specification of individual items of street furniture. The councils strategic 'Street Scene Design Guide' should address details such as height of public realm seating. The contrasting strips on the glass doors now on page 20 have been corrected and the colour contrasting has been changed from the

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		<p>suggest to developers/people that mauve is the correct colour to use instead of blue (page 10).</p> <ul style="list-style-type: none"> • Single sheet toilet papers and paper towel hand dispensers can be mentioned on page 28-29 in public toilets to aid those people with manual dexterity difficulties. • Page 30-diagram: a sliding door is suggested so that visually impaired people can see how to open and shut the door. Pleased by the fact that the document does not promote the use of revolving doors. • On page 61, a two way communication and seating is suggested for people with hearing, visual and speech impairments. A seat would help those who cannot stand for long periods. • It has been questioned whether the text only, large print and tape versions of the document include descriptions of all the diagrams? 	<p>dark blue to a lighter shade for clarity.</p> <ul style="list-style-type: none"> • The first bullet point on page 17 addresses the issue of the appropriate location and height of building names and numbers with technical specification. • Diagrams relating to parking have been altered to reflect the colour of the National Blue Badge scheme. • Dispensers for easy one-hand operation, within the design of WC's section is mentioned on page 31, second to last bullet point. • Sliding doors are not always a practical solution because you need an adjacent wall to slide the door along. This design method has been applied to several restaurants in the Borough and was also recommended by Harrow Association of Disabled people. • An extra bullet point added to the 'Means of Escape' section (page 65, last bullet point) emphasise the need for provision which allows two way communication by people with hearing, visual and speech impairments within refuge areas. • Text to be added to allow for audio description of all pictures, diagrams and photographs within the text only, large print, and audio versions are due to be undertaken after consultation with Communications and Corporate teams in the Council.

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6	Alison Fairhurst-Government Office for London (GOL)	GOL had no comments to be made at this time.	No issues to address.
IN-HOUSE REPRESENTATIONS			
7	Building Control	SPD appears to be a very useful document for designers and council staff alike.	No issues to address
8	Harrow Libraries	Report should be made available for visually impaired people in alternative formats.	The SPD will be made available in additional formats upon request. <i>(Provision for meeting requests will be addressed at the corporate level as this is a Council wide issue. The Communications and Corporate departments will be informed of the legal requirements.)</i>
9	Canons Park Project Officer	Had an overview of the parks section of the report and advised that Peter Whittington and David Corby be contacted as they are working on a borough parks signage scheme at present. 'excellent overall content' and contents page presents the document to be really useful.	No issues to address
10	Community Safety Services (CSS)	Document looks comprehensive. Suggests 2 things: (1) the possible inclusion through reference or through stating directly to 'designing out crime' criteria relating to any form of spatial or other development. This should be central to initial design	(1) The essence of 'Designing Out Crime' has already been addressed, if not in these exact words. The detail of which should be included in the Council's Strategic 'Street Scene Design Guide' which addresses the detail of street design. (2) Text has been requested from CSS

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		considerations of any public space. (2) In relation to the licensing of street cafes etc. These will fall within the new licensing regime and reference to this and or the Licensing Policy and its objectives can form part of the text.	in respect of recent & relevant licensing legislation. Once agreed, it will be added to SPD.
11	Conservation Officer	The listed building section is accurate, clear and friendly- looks good.	No issues to address. (The Conservation Team were involved in the writing of page 54).
12	Town Centre Manager	<ul style="list-style-type: none"> • The Foreword is attributed to Joyce Markham in the Contents, however her name does not appear on page 1. • The good design for retail access only demonstrates one example (page 15). • The way in which seating is shown in the diagram on page 37 suggests that seating should be a fitted fixture. • Litter bins should not impede access as on page 39. • The overall design and use of cartoon characters and photos are applauded as they clarify the text. 	<ul style="list-style-type: none"> • Page 1 has been amended. The foreword has been attributed to an appropriate officer – Andy Parsons, Groups Manager, Planning and Development because it is a planning document and Andy will be in a position to respond to any queries relating to the SPD due to his experience. • Work continues on the SPD to include two further examples (pages 15-16). Therefore 3 examples are now presented for creating access into small shop units. • Fixing of seat shown in diagram (now page 41) has been removed. • Wording relating to litter bins has been appropriately amended on page 42.
13	Highways Section	Disagrees with the need for distinguished cycle paths by a change of level as stated on page 8 for reasons that: a change of level between two surfaces is not always possible or even desirable, especially where vehicle crossovers	Sensitivity was applied in this area when Access for All was originally written. A level difference is the preferred option amongst blind and people with partial sight, as it provides obvious tactile reference to a change in zone. It

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		cross a cycle path that runs adjacent to a footway, or where the footway is behind the cycle path and interrupts the natural flow of surface water.	is however appreciated that application of this design method will not be appropriate in all situations, hence the words "...as appropriate" were used to allow the Council to invoke its discretion. A cycle route, designed with these principles, was created in Alexandra Avenue during the latter part of 2001/2. The Access Officer has since had good feedback from members of the Mayor's Access Committee. The Access Officer therefore proposes no change.
14	People First Development Officer	Door frames can be the same colour as the wall so long as the door is a contrasting colour. This information was obtained from a recent study undertaken by Reading University.	The option was considered and it was felt that the SPD provide the reader with insight into the overall concept. Each location and its individual colour scheme will determine how best to achieve a successful and accessible colour contrast. Access Officer therefore proposes no change.