

CONSULTATION STATEMENT

Access for All Supplementary Planning Document

This consultation statement is required in connection with the preparation of Harrow's Access for All Supplementary Planning Document (SPD), in accordance with Regulation 17 (2) (b) of the Town and Country Planning (Local Development) England Regulations 2004. It demonstrates whom and how the Council has engaged in the early stages of preparing the SPD and its accompanying Sustainability Appraisal (SA), and how the issues have been addressed in the adopted SPD/SA.

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. Statutory consultation took place in November and December 2005 (18th November - 30th December 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
Disability Awareness in Action	Sport England

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) report (November)

The Council is producing a SPD entitled 'Access for All' which will elaborate upon the application of access-related policies in the adopted Harrow Unitary Development Plan. An important stage in producing the SPD is undertaking formal statutory community engagement in order to finalise the content of the document. You are invited to comment on the Access for All SPD and the Sustainability Appraisal report that accompanies it. The consultation period starts on Friday 18th November 2005 and comments should be received no later than 5pm on Friday 30th December 2005.

Copies of the [Access for All SPD](#) and the accompanying [Sustainability Appraisal report](#) and [text only](#) are available. Copies are also available for inspection at Planning Reception, Garden House, 5 St. John's Road, Harrow, HA1 2EE. Your comments should be made on the [standard response form](#) For more information, or to request a copy, please contact 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	Tricia Lloyd – Environment Agency	<ul style="list-style-type: none"> The Environment Agency has no comments to make on these proposals. 	No changes necessary.
2	Graham Saunders – English Heritage	<ul style="list-style-type: none"> They welcome the reference to their publication <i>Easy Access to Historic Buildings</i> (July 2004) and would urge that the recently published <i>Easy access to Historic Landscapes</i> (October 2005) be included in the SPD as well. With regards to the SPD Sustainability Appraisal, Appendix 2 which mentions public facilities which are listed buildings – The assessment described of each building is useful, but they would suggest that the needs of obtaining better access are balanced against the integrity of the listed building. A common solution is not always achievable and PPG15 and local plan policies should always be considered in the development of a suitable solution. English Heritage strongly advise that the council’s own conservation staff be closely involved throughout the preparation and implementation of the SPD. 	<p>The Sources and References page in Access for All refers to reading material that was used during the preparation of the SPD. It is therefore not appropriate to list Easy Access to Historic Landscapes in this section.</p> <p>The SPD illustrates case study examples of existing buildings in Harrow. It does not suggest how buildings might be changed or discuss access design in any detail. The Buildings of Special Architectural Interest section within the Access for All SPD clearly states that access considerations should be dealt with sensitively without compromising the historic integrity of the building. The SA compatibility matrix –Figure 4 also states that ‘there are some areas of potential conflict which will always remain, for example, certain listed buildings which may require changes to be accessible to all and afford equal opportunities to all, may not be adaptable to accommodate access arrangements as this could compromise</p>

Representation Number	Individual/Organisation	Summary of representation/issue	How the issues raised have been addressed in the SPD
			<p>the architectural and historic value of the building. It should be noted, however that where adaptations are permissible, potential likely negative impacts can be avoided through the implementation of the Access for All SPD and the saved HUDP policies.'</p> <p>Consultation with Harrow Council's conservation team was sought prior to producing the SPD and during production.</p>
3	David Hammond-The Countryside Agency (Landscape Access Recreation –LAR)	<p>Mention is made to the fact that the Countryside Agency has focussed its planning activity on interests relating to landscape, access and recreation (LAR).</p> <p>The SPD is commended for the good link to the London Plan. The SA of the SPD is supported, specifically objective 2 of the SA relating to the protection of the quality, quantity and accessibility of open spaces in the Borough. Objective 12 in respect of reducing social exclusion is also supported. Figure 4 of the SA which demonstrates that objective 12 in reducing social exclusion to among others, leisure facilities is also supported. The clear links to the HUDP are also welcomed.</p> <p>A suggestion for change is also made to the</p>	<p>Acknowledged.</p> <p>No change required.</p> <p>No change is proposed as the Harrow UDP is</p>

Representation Number	Individual/Organisation	Summary of representation/issue	How the issues raised have been addressed in the SPD
		Harrow UDP Policy EP47	an adopted document which does not fall into the remit of this work or consultation.
EXTERNAL ORGANISATIONS & PEOPLE REPRESENTATIONS			
4	Joint Committee on Mobility of Blind and Partially Sighted People (JCMBPS)	<ul style="list-style-type: none"> The JCMBPS is delighted by the Access for All SPD. Recommend consultation with local visual impairment organisations, access and disability groups and the local Guide Dogs Centre. 	Consultation was sought from a wide variety of pan disability organisations and impairment specific groups.
5	Mr Jeffries Harrow on the Hill	<ul style="list-style-type: none"> Front cover - remove "Draft" <p>Statutory and Policy Context, para re SPD "off putting and not user friendly. Move to back of book?" also, HUDP "jargon" and alter "Its guidance can" to "Its guidance will"</p> <p>Acknowledgements – move down last line "for their assistance."</p> <p>P 9 – remove comma after 3rd line "promote," and 4th bullet point re word "unavoidable". (Mr J says "can one avoid unavoidable")</p> <p>'distinguish" to "distinguishable"</p> <p>P10, 4th bullet point, reword to "pedestrian circulation areas, clear of free standing advertising, such as A boards"</p>	<p>The grammatical and typographical suggestions were considered and the vast majority of points were taken on board.</p> <p>Moved to back of document.</p> <p>Changed.</p> <p>Changed. P9</p> <p>Changed. P10</p> <p>Changed. P10</p>

Representation Number	Individual/Organisation	Summary of representation/issue	How the issues raised have been addressed in the SPD
		<p>Mr J says bullets don't follow on as they are. P11 - middle transfer area – Mr J says “not immediately obvious and it helps with this”.</p> <p>P16 - Diagrams are not helpful.</p> <p>P18 - Design of dropped kerb needs to improve, looks like an obstacle.</p> <p>P19 -1st bullet, use brackets around “particularly people who are visually impaired”. Remove “that they are approaching a flight of steps” add to end “, that they are approaching a flight of steps.</p> <p>P19 bottom left diagram “needs a heading”.</p> <p>P19, bottom right diagram “doesn't appear to extend” re handrail.</p> <p>P23 last bullet, comma after first word, remove “which are”, add “and” between “minimal” and “fitted” instead of comma. Clumsy phrasing for last part of sentence – put full stop after seat and remove “should also be provided”.</p> <p>P24, 5th bullet, Mr J question marked “exposed edges”.</p> <p>P25, No signage! Reception desk on low level</p>	<p>Changed p11</p> <p>Diagrams made clearer. P16</p> <p>Altered. P18</p> <p>Changed. P19</p> <p>Changed. P19</p> <p>Changed. P19</p> <p>Changed. P23</p> <p>Changed. P24</p> <p>Changed. P25</p>

Representation Number	Individual/Organisation	Summary of representation/issue	How the issues raised have been addressed in the SPD
		<p>or recess for wheelchair, No recess for wheelchair in reception desk, Hearing enhancement – yellow? And No signage anywhere.</p> <p>P28 diagram, mirror not clear.</p> <p>P32 Signage and wayfinding, move “For people with little or no sight, visual signs are of little or no use.”, Until bottom of second para. Mr J also suggests underlining word “consider” in third para.</p> <p>P33, picture “light lettering, contrasting with dark background on a pale wall” – not clear. Dark background.</p> <p>P34 – Title for colour diagram to be changed to “Example of good and bad colour contrasts” and Under “colour” change first word to “Signs” and remove “be” at the end of sentence.</p> <p>P34 – 1st bullet insert “have lettering” in front and 2nd bullet insert “be” at the start.</p> <p>P34 – under Lighting for signs remove word “they” from first sentence.</p> <p>P34 – Specific features, remove “be” from front of first 2 bullets.</p>	<p>Changed. P28</p> <p>Changed. P32</p> <p>Changed. P33</p> <p>Changed. P34</p> <p>Changed. P34</p> <p>Changed. P34</p> <p>Changed. P34</p>

Representation Number	Individual/Organisation	Summary of representation/issue	How the issues raised have been addressed in the SPD
		<p>P 41 – Add comma to 3rd bullet after word “required” and Mr J questions signage on toilet door. Of bottom right hand seating Mr J says “looks like a blob, deliniate seat and change colour”.</p> <p>P 42 – Café culture, add coma after chairs at end of first para. Door of Giovanni’s restaurant not accessible.</p> <p>P43 – Leisure and entertainment, 3rd bullet to be changed to read “allow people not taking part in an activity to be socially included.”</p> <p>P43 – Parks and open spaces, change first sentence to read “Whilst it is important to maintain designed aesthetics, whether natural, formal or rugged, sometimes compromises . . .”.</p> <p>P44 – “Seems odd that slides and swings are not gated”.</p> <p>P45 – penultimate bullet, Mr J queries word “restricted” and says “There should be provision made for people with mobility and sensory impairments to make full use of security or restricted access features, eg a gate”.</p>	<p>Changed. P41</p> <p>Changed. P42</p> <p>Changed. P43</p> <p>Changed. P43</p> <p>Gates added. P44</p> <p>Changed. P45</p>

Representation Number	Individual/Organisation	Summary of representation/issue	How the issues raised have been addressed in the SPD
		<p>P45 – 2nd bullet, alter to read “some soft play surfaces, whilst maintaining as much of the natural environment as possible”.</p> <p>P 47 – Keep fit areas and gyms, first sentence remove “s” off “wheelchairs”.</p> <p>P48 – regarding diagram “Do you mean adjustable changing table surface?”</p> <p>P49 – “check out grab bars” and “signage text” for toilet door, also last bullet change figures to “100-150 (mm in pool)”.</p> <p>DP 51 – end of 3rd line add “those” and Mr J queries why seats show their backs to the rostrum? “Is this correct?” and 5th bullet change to read “ allow people who experience seizures, to use an areas of spacious seating that is designed as an integral part of the general layout”.</p> <p>P53 – move word “access” in last sentence before bullets, from before to after “considerations</p> <p>P54 – 6th bullet Mr J queries if it is realistic and achievable to allow participation in organ lofts and bell ringing towers.</p>	<p>Changed. P45</p> <p>Changed. P47</p> <p>Changed. P48</p> <p>Changed. P49</p> <p>Changed. P51</p> <p>Changed. P53</p> <p>Changed. P54</p>

Representation Number	Individual/Organisation	Summary of representation/issue	How the issues raised have been addressed in the SPD
		<p>P56 – 3rd bullet remove “(as a last resort)” and add a comma after “views of areas,”.</p> <p>P57 – 2nd bullet delete “social interaction of all, including areas such as, refreshments and quiet study places and recreational opportunities” and replace with “equal opportunities for everyone, including access to areas, such as refreshment places, quiet study areas, recreational facilities and computer learning centres.”</p> <p>P59 Top diagram suggests re-doing shelving as it is not low. Bottom left picture re-title “Easily identifiable parking space close to library entrance”.</p> <p>P 61 – diagram, suggests shelves and mirror in bathroom over basin. Last bullet, hyphen “footrests”.</p> <p>P62 – add comma after “telephone” and under Bathrooms, 2nd bullet re-write to read “shower facilities that can be accessed by people using portable shower chairs”</p> <p>P63 – 5th line after word “emergency” add word “escape”, remove comma after “plan” and change to a full stop. Start new sentence with “This ensures that” leaving out word “to”.</p>	<p>Changed. P56</p> <p>Changed. P57</p> <p>Changed. P59</p> <p>The focus of the picture was on the detailed design of the bedroom and not the bathroom. No change made. P61</p> <p>Changed. P62</p> <p>Changed. P63</p>

Representation Number	Individual/Organisation	Summary of representation/issue	How the issues raised have been addressed in the SPD
		<p>P63 – 1st bullet to read “reliable, flexible, and comprehensive systems . . . “.</p> <p>P63 – Refuge areas, 3rd bullet, remove (s) after word “users”.</p> <p>P 64 – Re diagram, check with fire brigade whether sign should be green. Beside communication point add a notice indicating purpose of area.</p> <p>P65 – Replace 2nd bullet with “that a person is nominated to be responsible for actioning evacuation procedures”.</p> <p>P71 – Remove 4th bullet – repeats last bullet. Diagram, move up the line indicating 1200mm, to higher up machine.</p> <p>P73 – 1st bullet, lower case “P” to start, 3rd bullet, remove “as appropriate” and add “where a website voice-over, requires translation”, 4th bullet change to “providing clear information in both text and pictorial formats”.</p> <p>P 74 – Check out quotes and add to bullets 6, 11, 12, 13, 14, 15, 16, 17.</p> <p>P75i – “This needs to go on front inside cover, and increase size of text!!!”</p>	<p>P63</p> <p>Changed.p63</p> <p>Changed. P64</p> <p>Changed. P65</p> <p>Removed. P71</p> <p>Changed. P73</p> <p>Changed. P75</p> <p>Moved, Page i</p>

Representation Number	Individual/Organisation	Summary of representation/issue	How the issues raised have been addressed in the SPD
		P76 – “Not needed on finished product!” <ul style="list-style-type: none"> • The Association fully Supports the document 	Changed.