

## CONSULTATION STATEMENT

### Accessible Homes Supplementary Planning Document<sup>1</sup>

This consultation statement is required in connection with the preparation of Harrow’s Accessible Homes 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/SA.

**Initial consultation on the draft Accessible Homes SPD took place over a four-week period in September and October 2005. Statutory consultation took place in December 2005 (2nd-30<sup>th</sup> December 2005).**

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

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| Shopmobility                             | Family Housing Association          |
| Harrow Association of Voluntary Services | Genesis Housing Group               |
| Access Association                       | Haig Homes                          |
| Disabled Foundation                      | Hanover Housing Association         |
| Harrow Crossroads                        | Harrow Churches Housing Association |
| Harrow Association of Disabled People    | Home Group Limited                  |
| Harrow Carers Centre                     | Housing 21                          |
| Harrow Early Years and Childcare         | Innisfree Housing Association       |

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The title of the Accessible Homes SPD was previously Mobility and Wheelchair Housing SPD and the re-naming of the SPD was proposed for at the time of adoption. This change was outlined in the Annual Monitoring Report (AMR) and agreed by the Government Office for London (GoL). The previous title Mobility and Wheelchair Housing was considered out-dated and out of step with current terminology. The new title is a more accurate representation of the subject matter of the document and will reflect the relevant Policy title in the Unitary Development Plan.

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| Services  |  |
| Harrow Leisure Centre                                 | Inquilab Housing Association Limited           |
| Harrow Mencap   | John Grooms Housing Association                |
| Mind in Harrow  | Metropolitan Housing Trust Limited             |
| MS Society  | New Era Housing Association Limited            |
| Community Link Up                                     | Paradigm Housing Group                         |
| Greater London Action on Disability                   | Peabody Trust                                  |
| British Council of Disabled People                    | Pinner House Society                           |
| Royal National Institute for the Blind                | Sanctuary Housing Association                  |
| Royal National Institute for the Deaf                 | Shepherds Bush Housing Association Limited     |
| People First  | Stadium Housing Association Limited            |
| Sport England   | Stanmore Christian Housing Association Limited |
| Disability Awareness in Action                        | The Abbeyfield Harrow Society Limited          |
| Disability Rights Commission                          | The Guinness Trust                             |
| National Centre for Independent Living                | Warden Housing Association Limited             |
| Government Office for London                          | Women's Pioneer Housing Limited                |
| Greater London Authority                              | Barratt Homes North London                     |
| Environment Agency                                    | Bellway Homes North London                     |
| English Nature  | Berkeley Homes West London                     |
| Countryside Agency                                    | Bovis Homes South East Region                  |
| English Heritage                                      | Bryant Homes London                            |
| Highways Agency                                       | Clearview Homes Ltd                            |
| London Borough of Hillingdon                          | Crest Partnership Homes Ltd                    |
| London Borough of Ealing                              | Fairclough Homes Northern Home Counties        |
| London Borough of Hounslow                            | George Wimpey North London Ltd                 |
| London Borough of Brent                               | George Wimpey West London Ltd                  |
| London Borough of Hammersmith & Fulham                | Goldcrest Homes plc                            |
| London Borough of Barnet                              | Home Builders Federation                       |
| Hertsmere Borough Council                             | Laing Homes North Thames                       |
| Three Rivers District Council                         | Martin Grant Homes (UK) Ltd                    |
| Hertfordshire County Council                          | McCarthy & Stone Developments Ltd              |
| Elstree and Borehamwood Town Council                  | Rialto Homes Plc                               |
| Watford Rural Parish Council                          | St. James Homes Ltd                            |
| Commission for Architecture and the Built Environment | Joseph Rowntree Foundation                     |
| Anchor Trust  | Dominion Housing Group                         |
| Apna Ghar Housing Association Limited                 | Ealing Family Housing Association Limited      |
| ASRA Greater London Housing Association Limited       | English Churches Housing Group                 |
| Bnai Brith JBG Housing Association Limited            |  |

The draft SPD and SA Scoping Report were also placed on the Council's website (see actual website notice below and note that the SPD is referred to by it's previous title) and made available for inspection at Planning Reception.

**Mobility and Wheelchair Housing Supplementary Planning Document (SPD) and accompanying Sustainability Appraisal (SA) report (December)**

The Council is producing a Supplementary Planning Document (SPD) entitled 'Mobility and Wheelchair Housing' which elaborates upon the application of access-related housing 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 Mobility and Wheelchair Housing SPD and the Sustainability Appraisal report that accompanies it. The consultation period starts on Friday 2nd December 2005 and comments should be received no later than 5pm on Friday 30th December 2005.

Copies of the [Mobility and Wheelchair Housing SPD](#) and the accompanying [Sustainability Appraisal Report](#) are available. A [text only](#) version of the SPD is available for those wishing to access the document electronically or create a personalised printed copy. 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](mailto: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:**

| <b>Representati<br/>on<br/>Number</b>                      | <b>Individual/<br/>Organisation</b>  | <b>Summary of representation/issue</b>   | <b>How the issues raised have been<br/>addressed in the SPD</b>   |
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| <b>STATUTORY CONSULTATION AUTHORITIES REPRESENTATIONS</b>  |  |  |   |
| 1  | Tricia Lloyd –<br>Environment Agency   | Environment Agency has no comments to make on these proposals  | No changes necessary.   |
| 2  | David Hammond-The<br>Countryside Agency<br>(Landscape Access<br>Recreation –LAR) | <ul style="list-style-type: none"> <li>• Mention is made to the fact that the Countryside Agency has focussed its planning activity on interests relating to landscape, access and recreation (LAR).</li> <li>• They mention that they previously responded to the SPD and SA and that they have nothing further to add to their previous correspondence.</li> </ul> | <p>Noted.</p> <p>Previous points considered and incorporated into the development of the documents.</p>   |
| <b>EXTERNAL ORGANISATIONS &amp; PEOPLE REPRESENTATIONS</b> |  |  |   |
| 3  | John Wachter –<br>RPS Planning (on<br>behalf of Fairview<br>New Homes Ltd )      | <ul style="list-style-type: none"> <li>• Access statements should not be required for all planning applications. They feel this places unnecessary burden on applicants and should only be required for larger residential schemes in which provision of Lifetime Homes and Wheelchair Housing is a requirement.</li> </ul>  | <p>Planning and Access for Disabled People: 'A Good Practice Guide', ODPM: March 2003, states that local planning authorities should require Access Statements as part of the development process. The exact content of the Access Statement will depend upon the size of the development proposal. A detailed Guidance Note explaining how to write an access statement, will be included in planning application packs.</p> |

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|   |   | <ul style="list-style-type: none"> <li>• Objection to Wheelchair Standard Homes (WSH) being evenly distributed throughout a residential development. They consider this unreasonable for smaller scale developments where it is impractical to distribute the WSH. They suggest a flexible approach should be discussed and negotiated on the merits of each case.</li> <li>• Fairview would like it made clear that the detailed design considerations included in the document offer guidance options for consideration by applicants. Adequate flexibility should be incorporated into the document so that detailed design of lifetime and WSH can be determined by applicants in response to a range of site-specific characteristics that need to be taken into account when designing a proposal. Specific references to requirements should carry the caveat “Consideration should....” Or “should normally...” <ul style="list-style-type: none"> <li>• Fairview would like to be noted as an interested party in the progression of the LDF</li> </ul> </li> </ul> | <p><b>Page 5 &amp; 6</b> To facilitate the social interaction of disabled people and to avoid the possibility of creating ‘disability ghettos’ and residents falling victim to targeted hate crime, it is necessary to evenly distribute wheelchair accessible homes within developments. The document has however, been altered to emphasise the negotiation element for partnership working between the council and housing developers.</p> <p>Lifetime Homes are nationally recognised standards that have been embraced by Government legislation and more recently, the Mayor for London’s Spatial Development Strategy. Standards are not standards if they are not adhered to. The Wheelchair Standard Home design guidance has been compiled by reference to the Scheme Development Standards and Wheelchair Standard Housing Guide, published in 1997.</p> <p>No changes are therefore proposed.</p> |
| 3 | Albert Samuelson – Jewish Community Housing Association | <ul style="list-style-type: none"> <li>• SPD Appendix 1 Environmental Assessment Para 2 – They cannot see that there will be any reduction in applications for</li> </ul>  | The purpose of the SPD is not to reduce the amount of Disabled Facilities Grant to disabled people living in existing homes.  |

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|   |   | <p>DFG</p> <ul style="list-style-type: none"> <li>• SPD should show greater joined up thinking on provision of DFG to tenants who do not want to move.</li> <li>• Policy should recognise considerable demand for adaptations that do not require new build or wholesale reconfiguration.</li> </ul>   | <p>DFG is ring-fenced funding paid by central Government, through Local Authorities. Providing accessible homes will in the long term eliminate the need to carry out extensive alterations to private dwellings and therefore will reduce overall DFG expenditure. No changes are therefore proposed.</p>  |
| 4 | R.E Goodman-Harrow Churches Housing Association | The Association fully supports both documents  | No changes required.  |
| 5 | W G Luck – George Wimpey West London            | <p>“The provision of 100% lifetime homes is wasteful of limited land resources in that smaller dwellings such as 2 bedroom homes would have to be up to 30% larger with an increased frontage reducing the achievable. All other dwellings would have to be increase in size to a lesser degree the implication is that all blocks of flats should be provided with lifts, an enormous extra cost at a time when the government is seeking a reduction in construction costs. Lifetime homes is a costly and wasteful policy when most people will be likely to trade down to more appropriate accommodation at the time.”</p> | <p><b>Page 15</b> - According to independent research commissioned by the Joseph Rowntree Foundation around 1997, buildings to Lifetime Home Standards does not adversely affect high density development, if designed accurately. Designing Lifetime Homes (written by Kim Sangster) demonstrates a number of ways in which features can be incorporated into virtually any type of home. (Drawings illustrate dwellings with narrow frontages.) Example plan layouts have been redrawn accordingly.</p> <p>Developers need to be clear about Lifetime Home criteria and should not confuse the Standards with Wheelchair Standard Housing. In an effort to provide clarity, the two sets of standards are now presented on separate pages, from <b>page 20 - 37</b></p> <p><b>New page 11</b> inserted to provide clarity on what a Lifetime Home is not.</p> |

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| 6 | Jaqueline Lockyer-<br>Access Consultant | <p><b>Front Cover</b></p> <ul style="list-style-type: none"> <li>• The white text does not contrast in luminance well enough to provide assistance to visually impaired readers. Is it possible to edge the text with perhaps yellow?</li> <li>• The reflective nature of the paper used may inhibit access for some readers</li> <li>• Font and font size to be made accessible throughout document.</li> </ul> | <p>Comments from the National Register of Access Consultants Auditor were incorporated into the document..</p> <p><b>Front cover</b> has been text adjusted to provide good colour contrast.</p> <p>Non-reflective paper will identified at the final printing stage.</p> <p><b>Page removed</b> HOW TO COMMENT - Final document cannot be commented on.</p> <p>Font size adjusted <b>throughout the document</b>, including annotation</p> <p>WRITTEN AND PRODUE BY - Add Jacqueline Lockyer – NRAC accredited, consultant to end of Acknowledgements list.</p> <p>PAGE REQUESTING SUMMARY/OWN LANGUAGE - Moved to inside front cover and increased to a font size 14 equivalent.</p> |

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|  |  | <p><b>Page 1 Forward</b></p> <ul style="list-style-type: none"> <li>In the first paragraph the words old age can be changed to “age”, as it is the ageing process rather than old age that creates difficulties .The London Plan uses the term older people and is a little kinder.</li> </ul> <p><b>Page 4-5 Planning Policy Context</b><br/>The text in the green box has been justified to neaten. Justified text may create difficulties for some people with vision impairments.</p> <p><b>Page 6-7</b><br/>The Layout diagram would benefit from bolder text, as the existing text is not really distinguishable from the diagram.</p> <p><b>Page 8-9</b><br/>There is a typo on item 15.This should read 800mm from the floor. The section diagrams are very difficult to interpret. There is a suggestion that the steps lead from the front door to a raised lounge at the rear. There is very little real colour contrast to the diagrams and I think that it was a mistake to make the sitting room carpet the same colour as the external grass. These diagrams would benefit from greater colour contrast, 100% enlargement, and possibly a numbered key.</p> | <p><b>Page 1</b> – terminology and meaning altered in paragraph one. Now reads “...irrespective of disability, age or changes in lifestyles”.</p> <p><b>Page 4</b> – the policy aged H18 text has been left aligned within the box.</p> <p><b>Page 7</b> – the diagram has been read redrawn and the associated text has been reworded and made distinguishable from the diagram.</p> <p><b>Page 10</b> – the Lifetime Homes diagram has been adjusted in principle with these observations.</p> |
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|  |  | <p><b>Page 10-11</b><br/>Diagrams here offer improved colour contrast. Again sections are cluttered and would benefit from 100% enlargement and a numbered key.</p> <p><b>Page 12-13</b><br/>The solid walls to the plans are visually accessible. However the detail printed in pale olive green is very, very difficult to distinguish under normal lighting conditions. Additionally the informing text accompanying the diagrams is impossible to read under normal circumstances (I needed a magnifying glass)</p> <p><b>Page 14-15</b><br/>(See comments for pages 12 and 13) additionally the text contrasts poorly against some of the backgrounds notably the building and path .I think that the parking situation could be clearer. Are these paths running through the car park or additional space for transfer?</p> <p><b>Page 16-17</b><br/>Is it possible to indicate a letterbox type and height suitable for use by a wheelchair user in the diagram?</p> | <p><b>Page removed</b> – serving no useful purpose</p> <p><b>Page 15,17 &amp;19</b> – Diagrams redrawn to accurately reflect and support the guidance. Improvements have been made to the general readability of all example plan layouts.</p> <p><b>Page 15,17 &amp;19</b> – Diagrams redrawn to accurately reflect and support the guidance. Improvements have been made to the general readability of all example plan layouts.</p> <p>Page 23 – a letterbox has been incorporated into the picture</p> |
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|  |  | <p><b>Page 18-19</b><br/>Communal areas within blocks of flats should ensure:</p> <ul style="list-style-type: none"> <li>• A wheelchair accessible passenger lift of 1100 x 1400mm is provided.</li> <li>• Communal stairs are designed in accordance with the standards set out in BS 8300. There should be 900mm clear distance between stair wall and the edge of the opposite handrail/banister, to allow for installation of a stair or platform lift.</li> <li>• Lifts, stairwells and entrance doors should be located at the front of blocks of flats.</li> <li>• A corridor width of at least 1500mm.</li> <li>• A wheelchair accessible passenger lift of at least 1100 x 1400mm is provided.</li> <li>• That stairs are designed in accordance with the standards set out in BS 8300.</li> </ul> <p>The lifetime homes criteria on page 19 have not been bullet pointed. Is this deliberate?</p> <p><b>Page 20-21</b><br/>The fitted hand basin in the illustration has a pedestal and would not, as you know, be that accessible to wheelchair users. Can this be replaced with an illustration of a cantilever sink?</p> | <p><b>Page 25</b> – the page has been reworded to provide clarity.</p> <p><b>Page 28</b> – the pedestal has been removed from the handbasin featured in the picture.</p> |
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|   |  | <p><b>Page 22-23</b><br/>handles on the kitchen units do not reflect best practice.</p> <p><b>Page 24-25</b><br/>Second bullet point should read provide an adequate turning space<br/>Third bullet point should read or temporary location of the bed.<br/>Fifth bullet point offers the American spelling of the word manoeuvrability.<br/>Wheelchair standard home bullet point five should read...<br/>Should have a bathroom designed to BS8300, providing en suite facilities to the main bedroom.</p>   | <p><b>Page 30</b> – handles have been incorporated into the picture.</p> <p>The <b>entire document</b> has being proofread and reworded accordingly</p>  |
| 7 | Graham Nickson –<br>John Grooms Housing<br>Association | <p>Within the introduction we think it would be helpful to emphasise that while the lifetime homes standard is a good basic minimum, there are specific and relevant differences with wheelchair housing. This may seem a little over sensitive but a surprising number of developers and house builders do confuse the two.</p> <p>Planning Policy Context</p> <p>We are concerned that Policy H18 is far too subjective and open to interpretation. This is an issue because for new housing to meet the Lifetime Home or Wheelchair standards extra investment is required from the housing</p> | <p><i>(Comments provided by legal)</i></p> <p><b>Page 4</b> - Remove “The purpose of this SPD is in supplement Policy H18 Accessible Homes in the saved Harrow Unitary Development Plan (HUDP adopted July 2004). The policy is set out in Section 1.”</p> |

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|  |  | <p>developer. As many developers are concerned about maximising their profit from a proposed housing development, they will interpret the policy requirements in the minimum way possible. We have noted such an approach to housing developments within other local authorities in London.</p> <p>As is noted within the accompanying text to Policy H18 (pages 4 and 5), the London Plan insists that all new housing is built to Lifetime Homes Standards and that 10% should be wheelchair accessible or easily adaptable. These standards are measurable. However Policy H18 states that the provisions will only apply to a 'proportion' within 'larger residential schemes' - terms that are open to a wide variety of interpretation. JGHA would therefore question whether Policy H18 is really 'in-line' (p4) with the London Plan as claimed within the SPD.</p> <p>It is the policy that will be quoted by any developers who apply only minimum standards to their housing development rather than the accompanying text under 'Application of Policies'(p5). Even here, there are policy provisions which deviate from the London Plan. Under the sub heading of 'New Homes' the SPD discusses the application of the policy framework such that only 10 wheelchair standard properties can be built within any one development. Why only 10?</p> | <p>Replace with “The purpose of this SPD is to supplement the policies in the Development Plan. The Development Plan comprises the Harrow Unitary Development Plan (adopted July 2004) and the London Plan (adopted February 2004).</p> <p>Remove bottom paragraph on role of SPD in Harrow Unitary Development Plan.</p> <p><b>Page 5 – APPLICATION OF POLICIES –</b> add sentence “This SPD is supplementary to Policy H18 of the Harrow Unitary Development Plan (HUDP) and London Plan Policy 3A.4.”</p> <p>NEW HOMES – Remove “In-line with the adopted policy” and replace with “In-line with the Development Plan policies,”</p> <p>Alter heading “Existing Homes” to read “Residential Conversions”.</p> <p>Supplementary planning documents cannot surpass the requirements of the policy on which they are based.</p> |
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|  |  | <p>It may well be that the distribution of available land within Harrow can only accommodate housing developments which are a maximum of 100 units. If so why is this not stated rather than a numerical maximum which goes against the objective of promoting mixed and inclusive communities?</p> <p>*Detailed Comments*</p> <p>In the hope that the above concerns can be resolved our comments on the design aspects of the draft SPD are as follows. Can we reiterate our support for the objective of supporting house builders, developers and architects to produce more Lifetime and Wheelchair Standard Homes.</p> <p>Within the 'Detailed Design Considerations' section of the SPD we have concentrated on the wheelchair standards as that is our area of specialty. We have suggested additional small paragraphs which should be added to the existing text in the SPD</p> <p>Car parking - Wheelchair Standard Home (p15)</p> <p>* Hard standing should be level, allowing minimum fall for drainage to allow safe transfer between car and wheelchair. Gullies and drains must not cause hazards to wheelchairs or walking aids. In exposed locations a side protection (fence or wall)</p> | <p><b>Page 20-37</b> – all detailed comments received from John Grooms have been incorporated</p> |
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|  |  | <p>should be provided.</p> <ul style="list-style-type: none"> <li>* All parking spaces should be located with natural surveillance so as to design out crime. Where carports cannot be located with the dwelling entrance they should not be more than 30m away via level or gently sloping access.</li> </ul> <p>Approaches and entrances - Wheelchair Standard Home (p17)</p> <ul style="list-style-type: none"> <li>* External paths should provide hard surfaces which are non-slip, easy to maintain, hard wearing and adequately drained. Attention must be paid to ensuring that slopes have good grip for wheelchair tyres in poor weather conditions.</li> <li>* Good external lighting is required on pathways and parking areas controlled by solar time clocks. Individual entrances should be well lit with lighting controlled by passive infra-red sensors in addition to internal switching.</li> <li>* Adequate refuse disposal should be provided which is wheelchair accessible.</li> <li>* Easy to maintain garden areas are of primary importance where they are integral with the proposed dwelling.</li> <li>* In housing developments where</li> </ul> |  |
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|  |  | <p>residents do not have access to individual gardens, screened drying areas should be provided. These must include adjustable height rotary dryers which can be lowered.</p> <p>* A patio area should be provided in gardens with secondary external doors. Ideally they should be linked with a main path to provide a safe means of escape for the wheelchair user. Minimum size of the patio should be 3m x 3m.</p> <p>* Door entry areas need to be carefully detailed to prevent the ingress of rainwater and easy access to door locks for the wheelchair user.</p> <p>* The design and specification of damp proofing must allow for external ground level and internal finished floor levels that are the same around the property. This will avoid the need for significant ramps.</p> <p>* All wheelchair standard dwellings should have a ventilated area for charging and storing an electronically powered wheelchair. A minimum size of 1200mm x 1200mm x 700mm with an adjacent unobstructed transfer area are required. Access should be from the long side. The charging area's location should allow high level passive ventilation with mechanical ventilation only if this is not possible.</p> |  |
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|  |  | <p>WC's, Showers and Bathrooms - Wheelchair Standard Home (p20)</p> <p>* The bathroom/shower room is the most important room in the house for many disabled people as the ability to live independently can succeed or fail on reasonable provision for personal hygiene.</p> <p>* For a wheelchair standard house the bathroom should be located next to the main bedroom with either a storey height knock out panel or folding/sliding doors to allow easy access for a wheelchair user.</p> <p>Kitchens - Wheelchair Standard Home (p22)</p> <p>* At design stage it is often not known if the wheelchair user or non-disabled member of the household will use the kitchen. Therefore the kitchen design must allow for easy adjustment when the occupying household is identified as a tenant or purchaser. Care must also be taken in the relationship between various units to allow for the safe transference of pans etc with unobstructed knee space.</p> <p>Living Rooms - Wheelchair Standard Home (p24)</p> |  |
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|  |  | <p>* A secondary entrance is often best located here to allow the living area to be 'extended' into the garden via the patio noted on page 17. Unless a separate dining area is identified, a defined dining space with adequate circulation routes should be allowed. The living room should not be a through route to other rooms.</p> <p>Fixtures and Fittings - Wheelchair Standard Home (p26)</p> <p>* It is recommended that electrical sockets are positioned 750mm above floor level (except for those for appliances such as a washing machine) and at least 600mm from a wall intersection.</p> <p>* Each dwelling should have a telephone point in the living room, main bedroom and second bedroom. Telephone points should be adjacent to power points for lifeline connection.</p> |  |
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