Just Space response to M35 Inclusive Design   2718

M35. Would Policy D3 provide a justified and effective strategic framework for delivering inclusive design? In particular:

. a) Would Policy D3 address matters that can be delivered and enforced through the planning regime, in particular the requirement for emergency evacuation? Would it strike the right balance between providing for inclusive design and delivering the planned level of growth?

. b) Would it be effective in ensuring the diverse needs of all Londoners are integrated into development proposals from the outset? Would it be effective in ensuring that the experience and views of all Londoners, particularly excluded groups, are taken into account in the evaluation of development proposals?

. c) In this respect, would it provide an effective and justified strategic framework for the preparation of local plans and neighbourhood plans in relation to this matter?

This Policy is explicitly treated as only applying to project/building design. It should be moved or repeated in D1 which has a wider scope, covering public areas, district design, master planning.

In playing the role described here (§3.3.8) the Mayor must undertake to maintain consultations with a wide range of disability representative organisations. He should also build upon the GLA's own *Quieter Homes for London* standards of about 2005.

The text of this section relies on BS8300. This reference should be qualified because that standard is acknowledged by the BSI as not being sufficient to meet the needs of people on the autism spectrum. Furthermore the Mayor, if he is to rely on this document, should ensure that copies are available free of charge which is not the case at present.

Buried in a sub-section of text §3.3.7 *is "...show that the potential impacts of the proposal on people and communities who share a protected characteristic have been identified and assessed...*

Just Space proposal: **reflect in policy the requirement that (in effect) EquIA is needed.** Equalities considerations should be a core element in all design work.

New para §3.3.1a is welcome but does not cover this point.