Gateshead Access Panel
Disability Equality in Gateshead and the Region

One Core Strategy Review January 2012

**Response on behalf of Gateshead's
Disability Service User Involvement Forum
to the Public Consultation**

LDF Feedback Report No1
for
Development and Enterprise
Gateshead Council
Local Development Framework
NewcastleGateshead One Core Strategy

January 2012

Subject:	**NewcastleGateshead One Core Strategy**
Document:	One Core Strategy, Draft Plan, Sept 2011
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*Notes in red text in the following report represent updated responses to the relevant sections of the One Core Strategy Review April 2011 report following review of the September 2011 published draft documents. References and page numbering (in black text) in these section of this report refers to the earlier draft One Core Strategy 2030, published January 2011.

Additional Feedback to Consultation

Note: Reference should also be made to the following feedback reports prepared by GAP in response to the current public consultation:

LDF Feedback Reports

No 2: Urban Core Area Action Plan Review January 2012

No 3: Urban Design SPD Review January 2012

No 4: Housing Alterations + Extension SPD Review January 2012

One Core Strategy Review, January 2012

Introduction

Gateshead Access Panel (GAP) have been involved in the review of the public consultation documents as and when they have been made available during 2011, with submission of our initial feedback to the One Core Strategy main document in May 2011.

Overview of Report

This current report (LDF Feedback Report No1) responds to the consultation documents published in September 2011, updating on the earlier report, and is one of four reports we are submitting to Gateshead Council, which include:

LDF Feedback Reports
1. One Core Strategy Review Jan 2012
2. Urban Core AAP Review Jan 2012
3. Urban Design SPD Review Jan 2012
4. Housing Alterations + Extension SPD Review Jan 2012

These reports have been prepared following earlier review and discussion of the draft One Core Strategy document, involving GAP and other members of the Gateshead Disability Equality Service User Involvement Forum (DESUIF) facilitated by Gateshead Access Panel working in partnership with Darren Ramshaw, Access Officer, Gateshead Council. Due to the volume of material that has formed the principal documents for the current consultation (September 2011 – January 2012), as well as the numerous reference documents that are identified therein, it has not been possible to consult more widely on all of the policies, strategies, action plans, and supplementary planning guidance that is proposed. It was therefore agreed that GAP would review and respond to the current consultation documents on behalf of the DESUIF group, and provide feedback to the group to facilitate further discussion and follow-up as may later be required.

The above listed feedback reports form GAP's response on behalf of the DESUIF group to the following principle consultation documents:

1. Newcastle Gateshead One Core Strategy, Draft Plan, September 2011
2. Newcastle Gateshead Urban Core Area Action Plan, Draft Plan, September 2011
3. Gateshead Urban Design SPD, Draft Supplementary Planning Document, September 2011
4. Gateshead Household Alterations and Extensions SPD, Draft Supplementary Planning Document, September 2011

Primary Aim of GAP/DESUIF Review

Gateshead Access Panel and its colleagues within the Gateshead DESUIF group consider it to be of the utmost importance that equality issues for disabled people are adequately recognised and supported by the One Core Strategy, within and across the full remit of its policies, strategies, action plans, and standards; which is why they have invested so much resources into responding to this consultation.

If these core documents do not promote policies and provision to enhance the equality issues for disabled people at this strategic level, then disabled people including older people will continue to be disadvantaged and often excluded from their communities; as well as from facilities across the North East including opportunities for employment, health, leisure and tourism. Some of the greatest concerns for disabled and older people continue to be around the continuing limitations of existing housing and transport options.

The four LDF Feedback Reports prepared by GAP aim to highlight the current limitations and barriers to access and inclusion for disabled people and to inform the further development of the Local Development Framework, in response to the current draft documents for the Newcastle Gateshead Core Strategy and Urban Core Action Plan and Gateshead's Supplementary Planning Documents published September 2011.

"One Core Strategy, January 2011" Review, April 2011

Feedback from DESUIF and GAP

Background to GAP Involvement

Gateshead Access Panel were first made aware of the consultation on the NewcastleGateshead One Core Strategy on 14th February 2011 by Darren Ramshaw, Access Officer, Property Services, Development and Enterprise. We were made aware at that time of the public consultation "drop-in" events that had begun on 10th Feb., and were due to end on 18th Feb. We were requested at this time to comment on the consultation document and provided a link to the Gateshead website www.gateshead.gov.uk/haveyoursayonplanning. Darren requested Clive Coyne to provide a presentation to GAP at the forthcoming "Disability Equality Service User Involvement Forum" (DESUIF) meeting on 15th March.

The DESUIF meeting was attended by disabled service users and carers from disability groups in Gateshead as well as GAP members and workers. Those present at the meeting expressed concerns regarding the lack of previous opportunity to be involved in the consultation and involvement in the preparation of the strategy, as well as concerns over the existing Gateshead strategies and policies that have been used as evidence base for this strategy. Concern was also expressed that the consultation document did not appear to specifically identify much about disability issues and questioned how the document will address current inequalities. Clive requested GAP to provide a statement in response to the consultation document and agreed to allow additional time for GAP to respond to the consultation: it was agreed that GAP would aim to achieve this by the end of April.

A DESUIF Technical Review Meeting took place on the 19th April at which the "NewcastleGateshead One Core Strategy 2030 – Consultation Draft January 2011" document was reviewed by Steve Hudson, GAP Consultant with Darren Ramshaw. Comments and statements from this meeting are included below, with additional notes added during the preparation of this report to aid understanding or for clarification of the issue discussed.

Additional feedback and comments are also provided following further detailed review of the "One Core Strategy" document by GAP in response to content in '**Section 2: Strategic Policies**' and '**Section 3: Character Area Policies**'. **Red text refers to follow-up review of Draft for Oct-Nov 2011 Consultation** i.e. identifying any changes to current "Draft" document.

Comments/Statements from DESUIF Technical Review Meeting 19 April 2011

General Issue:
Overuse of the term accessibility throughout the document dilutes the need to address the barriers that disadvantage disabled people. The term accessibility is all too often considered in relation to travelling distances and travelling time for the general population and assumes the existing transport infrastructure meets the needs of disabled people. More detail in the glossary of terms may assist the readers understanding. The term 'inclusive' should be used when discussing the provision of policies, strategies, facilities and services that address the disadvantage that disabled people have with regard to access; including accessing the current transport options and transport infrastructure.

Sustainability and sustainable provision are discussed throughout the various sections of the document as an identified requirement of all policies and interventions. However, for true sustainability the policies, processes, schemes, and developments must be based on inclusive provision and inclusive design concepts, otherwise inequalities will result; which will require additional interventions and funding to redress. The need to be "inclusive" requires spelling out and reiteration wherever the term "sustainability" is used, to encourage the awareness of all those involved in the policies, processes and delivery, otherwise we will never be able to move close enough to a state of "Sustainability".

Specific Comments:

Section 1 Context and Vision

Spatial Portrait – Strategic Objectives

Page 7 – 3.7 – Concern that there is no specific reference to disabled people or statistics concerning disabled people. The overall objective appears to be adequate. No relevant change / update to document. However, now (Strategic Objective) SO5.

Note: The North East has highest incident of disability (24%) so if the figures for older people (who have similar needs but may not identify themselves as disabled) are combined with this figure then we are talking about a vast

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need to ensure inclusive transport and services through this strategy. It is important to ensure an economically active population and therefore more use of 'Health Impact Assessments' should be appreciated so that disabled people and older people are not excluded from being economically active. An Impact Assessment on the decision to be "focusing on the wider determinants of health" will likely need to include a "Disability Impact Assessment"; because we cannot assume that the reason for disabled people being obese is related to poor diet.

Page 8 (ref: paragraph 3.11 to Gateshead Staithes and Strategic Objective 3) – Concern that this objective may lead to the removal of street furniture and signage. Will this objective protect 'inclusive' access by disabled people? No relevant change / update to document. Now SO6

Note: The "experiments" in development of 'Home Zones' in recent years has failed in some respects, in particular in addressing the issues for disabled people who experience increased vulnerability on shared routes. The additional elements required to facilitate the use of the external environments by disabled and older people, such as inclusive seating, are less likely to be addressed where there is the tendency to remove even basic elements of infrastructure that can otherwise aid separation between vehicles and vulnerable people and/or to aid navigation of the environment with some safety.

Page 9 – Concern that this will lead to increase in disabled people and cyclists sharing the same routes. It is important that the correct standards for separation between different users are employed. Query about how connectivity / access for disabled people into Tyne Gorge will be achieved. No relevant change / update to document. Now SO7

Note: At a recent meeting to consult on a Tyne and Wear Local Strategic Transport Infrastructure Partnership funding bid, during discussion of priorities for cyclists, GAP raised the issue that Equality legislation indicates legal priorities should include disabled and older people. The needs of disabled cyclists should be considered when designing routes e.g. for use of tricycles. Consideration should also be given to where mobility scooter users fit in to the use of shared routes – are they accommodated?

Page 10 - Objective 5 – To achieve this objective on a sustainable and inclusive basis, consider within this objective the need to ensure facilities in

support of (businesses, shopping, education) also allow for inclusive provision i.e. accommodate the needs of disabled people.
No relevant change / update to document. However, now SO1 – need to refer to Urban Action Plan for more detail.

Note: An example of GAP's concerns, are the current proposals for commercial units within the Gateshead town centre Trinity Square development, where it will be up to individual businesses leasing these units to provide a mezzanine or upper floor level. The commercial viability as well as size of units is likely to constrain the ability to provide access to such upper levels for some units and / or operators, which will adversely impact on the employment, leisure and shopping opportunities of disabled people.

Page 11 - Objective 6 – No further comment Now SO2

Page 12 - Objective 7 – Suggested additional statement – *and support the needs of disabled people and older people more appropriately.*
No relevant change / update to document. However, now SO3 – need to refer to Urban Action Plan for more detail.

Note: Advised action by GAP here is to change Objective 7 to read: "Ensure the provision of quality district and local centres with a diverse range of shops and services that are accessible to meet the needs of all local communities **and support the needs of disabled and older people more appropriately."**

Explanatory Note: Whilst it may seem to many that the use of phrases such as "needs of all" ensures 'equality' of provision and opportunity it is not generally so unless the appropriate and effective impact assessments are carried out by individuals experiences and knowledgeable for the related equality groups. With regard to provision of local facilities and services, their importance to disabled and older people are likely to be a higher priority; if for no other reason than their more limited opportunities and choice of transport to access town and city centres or more remote or centralised facilities and services.

Page 13 - Objective 8 – Concern that there is a lack of background provided about the desperate lack of wheelchair accessible housing. Suggested additional statement – *and also recognises the need to address the limitations of housing design and developments on meeting the needs of disabled, older people and their families.*

No relevant change / update to document. However, now SO9 – need to refer to Urban Action Plan for more detail.

Note: Advised action by GAP here is to change Objective 8 to read: "Ensure our residential offer provides a choice of quality accommodation in sustainable locations to meet people's current and future needs and aspirations, and recognises the need to address the limitations of housing design and developments on meeting the needs of disabled and older people and their families."

Explanatory Note: There are assumptions made by many that 'Lifetime Homes' designs are suitable for all disabled peoples and carers needs. Due to spatial constraints, Lifetime Homes are not suitable for permanent wheelchair users who require regular and/or constant use of hoist transfers and assistance, so purpose built wheelchair accessible homes are required.

Page 14 - Objective 9 – Concern that there is no reference to continued limitations of **existing** system for disabled people and the need to address these limitations.

No relevant change / update to document. However, now SO10 – need to refer to Urban Action Plan for more detail.

Note: GAP's concern here is that whilst improvements and upgrades are often recognised as better provision for the general population, many existing barriers are often inadequately addressed or retained. Example of which are recent "improvement schemes" and the current "reinvigoration" of the Tyne and Wear Metro system and stations within Gateshead and Newcastle: -

- The improvement scheme at the Haymarket Metro station saw the replacement of two existing escalators and a central staircase with three new escalators, with no increased passenger lift capacity. This has reduced the available routes for disabled and older people as well as parent with young children and buggies who can no longer use the alternative stair route, with only the remaining one passenger lift to service everyone who cannot/does not wish to use escalators for whatever reason. This action was taken even though GAP raised concerns during early planning stages with Nexus and pointedly indicated their failure to apply a 'Disability Equality Impact Assessment' to the Haymarket project.
- Retention of long ramped access between platform and street level at other Metro stations, in some cases exceeding 2.5m such as at Felling

(where regulations advised lift provision), and no provision of lift access will also continue to have a long-term affect on limiting access for many disabled and older people who may otherwise make use of such locations and transport opportunities.

Page 13 - 3.28 – Tyne Tunnel - Are there any statistics to show that congestion has been relieved as this is not what people currently believe.
No relevant change / update to document. However, now SO10

Spatial Vision Page 17
NewcastleGateshead 2030
Suggested change paragraph 3 – Development will be to the highest possible standards *of universal* design.
No relevant change / update to document.

Urban Core
Concern with regard to the investment specific areas (Walker Riverside, Follingsby, Team Valley) have limited choice of access and inclusion in its broadest sense particularly with reference to disabled people.
Some rewording – but unable to confirm issue recognised – need to refer to Urban Action Plan for more detail.

Neighbourhoods
Need to address issues in relation to disabled and older people. Need to recognise requirement for accessible parking, wheelchair accessible vehicle parking, Shopmobility schemes and public transport mobility schemes.
No relevant change / update to document.

However, statements now updated under **4.Spatial Vision**, as follows:

"**4.5** In order to achieve our spatial vision, our policies will:

Increase our economic prosperity by focusing business growth and other development within our Urban Core to reinforce its status as the major place of work, and the main shopping and visitor destination in the North East; Ensure sufficient provision for our identified growth sectors, focused at our key employment locations and our established employment and industrial areas, further contributing to our increased prosperity;

Reinvigorate our Neighbourhoods and Rural Villages to create sustainable communities through regeneration and expansion where appropriate, to

provide new affordable homes in lifetime Neighbourhoods, where the needs of all our residents are met;

Create new sustainably linked Neighbourhoods providing areas of choice to support the increase in our population;

Ensure development is deliverable and sustainable, by requiring additional infrastructure to be provided where needed, as set out in an Infrastructure Delivery Plan and through our forthcoming Community Infrastructure Levy, and ensure the provision of the full range of community and local shopping facilities which contribute to health and wellbeing;

Enhance our quality of place through the protection and enhancement of our heritage assets, green infrastructure and other natural resources, and by ensuring that development is located in the most accessible locations, alongside positive action to address the impacts of traffic within the Urban Core and Neighbourhoods specifically; and

Ensure that Gateshead and Newcastle respond to Climate Change, providing opportunities for mitigation and adaptation. "

"Infrastructure Delivery Plans" will also need to respond to local community needs, through use of the "Community Infrastructure Levy" (CIL) based on needs identified by the community. However, local communities may demonstrate little awareness of the holistic and diverse nature of their community and will need guidance on what "should" and what "may" be considered under the listing of "infrastructure". Such listing should aim to address current inequalities of provision and social inclusion in local communities as well as issues more readily recognised by those communities. Although facilities such as play areas, parks and green spaces, cultural and sports facilities, district heating schemes and police stations and other community safety may be more obvious to local communities, other needs also exist to which they are often less aware, such as: provision of Changing Places toilets, Shopmobility facilities, Inclusive Play and/or Special Needs Play facilities, road crossing Improvements, drop kerbs, and other improvements to highways infrastructure for accessibility and inclusion. The sustainability of such improvements and facilities will also need to be addressed.

GAP Consultancy Follow-up Review and Comments

Section 2: Strategic Policies

1. Spatial Strategy
1.1. The Urban Core "…will be the priority for major development including office, retail, higher education, commercial leisure, culture and tourism…"

2. Climate Change – no comment.

3. Energy – no comment.

4. Flood Risk and Water Management – no comment.

5. Transport and Accessibility
5.1. Specific reference should be made to improving the infrastructure and opportunities for access to transport and the physical environment to meet the needs of currently disadvantaged groups within the community, including disabled and older persons, in recognition of existing limitations of and barriers to transport services and the environment. This should be an over-riding objective for those currently stated in the draft document under this Policy.

5.2. The document should also further demonstrate the opportunities to achieve this objective within the paragraphs under the heading "Promoting alternative travel choices".

Under Policy CS 24 'Promoting Alternative Travel Choice' the following has been added:

We will promote alternative travel choices to encourage a modal shift from sole occupancy car use to more sustainable alternatives, we will support:

(3) Equality of access to the transport network in order to provide appropriate travel choices and prevent exclusion

However, in consideration of the references to "10.33: New Technologies" there is the potential for disabled and older people's needs to be forgotten, as GAP have already indicated such as to the LTP3 Core Team in respect of the Urban Traffic Management Control System not specified to provide information on location and / or availability of Blue Badge Parking bays, etc.

10.12 through to 10.14 refers to "Walking and Cycling" as if the two should be considered to be married alongside each other within any proposed solutions for travel routes and travel schemes, for lifestyle reasons related to: healthy lifestyle, environment, and neighbourhoods (Home Zones). Whilst not wishing to discourage the promotion of cycling, there are a number of fundamental issues that appear to be most often forgotten when planning cycle routes, particularly as regards their interaction with the pedestrian environment and resulting impact on people with impaired mobility due to physical or sensory impairments. The best option to avoid such impact will generally always be to separate cycle routes from pedestrian routes by means of a physical barrier, i.e. avoiding solutions that involve shared surfaces / shared-use routes.

10.17 states: "Given economic constraints, it is not feasible to provide public transport services for all destinations, or at all times. We will therefore work closely with taxi (hackney carriage and private hire vehicle) operators, and community transport groups, to ensure that the more flexible services they provide are better integrated into transport planning and information provision." Whilst it is apparent that this statement is intended to identify aims to address some of the disparity for people living in locations less well serviced by existing public transport routes, it gives no indication to what extent this may be achieved. Also it fails to identify proposals to address the increased disparity for disabled people who have increased limitations on access to public transport.

10.19 identifies the **Car Parking Strategy** to be based on:
"NewcastleGateshead will develop a joint car parking strategy to manage demand. The strategy will seek to minimise long-stay commuter parking in the Urban Core and local centres while maximising short-stay parking for shoppers and visitors. The progressive introduction of car parking charges at retail centres will be sought where this can be achieved without threatening the vitality and viability of the centre. This will dovetail with the improvement of conditions for sustainable modes, including the expansion of Park & Ride."
GAP has previously expressed concerns locally to Gateshead Highways Officers as well as in response to the LTP3 Core Team, with regard to the issues of parking provision and use of Park and Ride facilities by disabled people. With regard to parking provision, limitations and restrictions, it is very important to recognise that many disabled people will continue to be dependant on their own private transport for getting around, and the provision of suitably located accessible parking locations, and preferably off-road. Any reductions in parking provision, such as to encourage modal shift,

should be managed so as not to adversely impact on disabled people, such as by retention or increase in the number of accessible parking locations. Whilst it is important for Park and Ride facilities to be accessible for everyone to use as far as possible, there will be limitations on its suitability and practicality for some people with mobility impairments, who currently depend on the use of their own private transport for getting around: for some it will be more cost effective to use their own transport to reach their intended destinations; and for many it will be less arduous with respect to reduced transfers between travel modes, which can have the impact of making the difference between whether or not they make the journey and have access to social interaction as well as facilities and services.

Policy CS26: Transport Impacts for Developments
This policy among other things requires developers to "Incorporate measures to improve air quality, including the provision of charging points for electric vehicles within major developments". However, GAP have not yet been made aware of any provision to ensure that such charging points will be accessible for use by disabled persons, with respect to the charging point design and location; although we have requested that Gateshead Council ensure this is achieved.

6. Health and Well-being

6.1. GAP concur with the stated intentions, which need to recognise:

> "Health Impact Assessment (HIA) is part of the mandatory 'Impact Assessment' required by Government for all relevant policies for developing better, evidenced-based policy by careful consideration of the impact on the health of the population. HIA can identify 'win-wins' across policy areas. For example, green space and green infrastructure improve mental and physical health and have been shown to reduce health inequalities." (Department of Health website: http://www.dh.gov.uk/en/Publicationsandstatistics/Legislation/Healthassessment/DH_647.)

6.2. The application of HIAs should be recognised as a mandatory requirement by all council services and that all proposals, policies and services are tested to "consider whether any socioeconomic or equalities groups will be particularly affected" and that includes:

> "Equalities groups such as race, gender, health, disability, sexual orientation, age, religion or belief" (Health Impact Assessment Tools, Department of Health, July 2010);

and where an adverse impact or no improvement for that group is potentially provided, then further considerations should be required for improvement

and or mitigation to the benefit of that group as appropriate to equality of opportunity.

6.3. Disability needs to be recognised as being a protected characteristic that can apply and impact on each of the other protected characteristics, i.e. race, gender, health, sexual orientation, age, religion or belief.

6.4. Therefore to ensure any equality impact assessment or HIAs is adequately addressed, the impact on disabled people, either as a separate group or integral to another group, should be fully considered in the development of or changes to proposed policies, strategies, plans, provisions and services.

6.5. With regard to the text in paragraph 8.4 relating to "…Designing –out crime and designing in community safety…", GAP advise increased awareness and recognition is required of the existence and impact of hate crime on disabled and vulnerable people, so that as other people in the communities as well as those responsible for policing such issues understand the importance of both recognising the signs of such acts and the need to be responsive to avert their recurrence.

Policy CS15: Health and Wellbeing:
This now states this will require that: -
"A Health Impact Assessment is prepared as part of the sustainability appraisal, of Development Plan Documents and Neighbourhood Plans."

Concentration and emphasis on provision and promoting "healthy transport choices such as cycling and walking" generally fails to recognise the infrastructure limitations as well as the personal physical limitations of many disabled and older people.

Even though Gateshead has recently investing over £36M on improvements to Sport and Leisure facilities, there has been considerable failure to address issues and existing barriers to these facilities for activities for disabled and older persons, ignoring advice and recognised standards. There are currently a good range of quality sport and leisure facilities throughout Newcastle and Gateshead to support healthy lifestyles of the general population, but this continues to often exclude people with profound and multiple impairments, as well as people whose mobility is affected by age or obesity, and people whose religious or cultural needs are not currently met.
Addressing these inequalities of access and opportunity and health inequalities needs to be given priority for investment of resources, which will also likely result in a reduced need for other resources to address current and future health concerns of these affected groups.

7. Economic Growth

7.1. Support to the retention and potential growth in capacity of disabled service user-led organisations should be recognised as an essential part of growing and supporting the knowledge-based economy; in recognition of the relevant expertise of such groups to support the maintenance and development of the various public and private sectors, their facilities and services.

7.2. "Securing good outcomes for disabled people may also mean bringing employment and housing services together to improve their well-being and meet emerging needs." (A Vision for Adult Social Care: Capable Communities and Active Citizens, Department of Health, Nov 2010, p.13, 3.14.)

8. Leisure, Culture and Tourism

8.1. The lack of availability of accessible transport options and corresponding services for many disabled people, limits their use of leisure, cultural and tourism attractions.

8.2. The limitation of economically affordable and accessible accommodation within the commercial sector also restricts the opportunities for tourism for disabled and older people.
Current legislation and standards appear to be ignored, where even the Building Regulations Approved Document M is not complied with or enforced with regard to either guest or student accommodation.

8.3. The intentions to "…meet an otherwise unmet demand" with regard to "sport and recreation facilities" is applauded, but recent re-development of the Gateshead Leisure Centres under the "Building an Active Future" programme has to date failed to address the unmet demands of many disabled and older people; who still find the facilities do not meet their individual and/or group needs for physical access and fail to offer "warm water" swimming sessions. (See discussion on 'Health Impact Assessments' above, under Policy 6. Health and Well-being.)
No relevant changes / updates to document.

9. Existing Communities

9.1. The limitations of the existing housing stock to provide a suitable housing mix that can support the long-term needs for adapted housing for disabled and older people, needs to be recognised; especially where this relates to families with a disabled child or adult. This relates not just to the size of property and the design of the homes, but also to the density of housing development and the impact of limitations on permitted development of individual homes.

9.2. The result of the above issue is likely to be higher cost adaptations for the homeowners and/or the local authorities.
See below at 11.

10. Delivering New Housing

10.1. Current proposals for new homes that are planned to minimum of Code for Sustainable Homes Level 4 does not provide any confirmation of the commitment to providing homes designed to meet the Lifetime Homes criteria or to the provision of "Wheelchair Housing Standards".

10.2. Existing housing stock as well as current housing development design and planning fail to adequately achieve a suitable housing mix that can support the long-term needs for adapted housing for disabled and older people, especially where this relates to families with a disabled child or adult. This relates not just to the size of property and the design of the homes, but also to the density of housing development and the impact of limitations on permitted development of individual homes.

10.3. The result of the above issues not being adequately addressed is likely to be higher cost adaptations for homeowners and local authorities.
See below at 11.

11. Ensuring a Balanced Housing Stock

11.1. There is a potential need that should be recognised for single-storey and homes with two or more stories, with 3, 4 or more bedrooms and or additional living spaces, that can provide potential for future adaptations and changes of use to meet Lifetime Homes criteria and long-terms needs for families with a disabled child or adult.

11.2. Reliance should not be placed on the Code for Sustainable Homes to address the provision of homes to the Lifetime Homes standard, as this is currently only mandatory at the highest level of the Code, Level 6.

11.3. The level of commitment to provision of homes to the Lifetime Homes (LH) and Wheelchair Housing Standards (WHS) needs to be verified: such verification should state the actual percentages of LH and WHS homes that are to be required and supported by the local authorities planning requirements: this should also confirm the range and mix of dwellings to be included, and cover the full range of sizes and housing types offered.

11.4. As well as relating to the size and mix of properties and guidance on the design of the homes, the planning requirements should also address the density of housing development taking into consideration the permitted development of individual homes: the implications of which can be significant for future adaptation of homes; especially where an extension of the building footprint may be required to address individual needs for disabled persons.

Policy CS13: Ensuring a Balanced Housing Stock: The current text to this policy appears to go some way towards recognising the above concerns including need for: "choice of suitable accommodation for the increasingly elderly population"; "affordable housing"; "larger family homes"; and "by encouraging provision of Lifetime Homes and wheelchair accessible homes in locations with excellent public transport accessibility": providing the latter does not also result in adverse restrictions on choice of living location for disabled and older persons. However, the issue raised at 11.4 above does not appear to be recognised in the current document.

7.26 of current (Sept 2011) document refers to "increasing the range of good quality student accommodation", but currently legislation and standards appear to be ignored, where even the Building Regulations Approved Document M is not complied with or enforced with regard to either guest or student accommodation.

Several references in current (Sept 2011) document to Land Allocation DPDs, but no explanation / description of "DPD" – this is required in the Glossary, i.e. "Development Plan Documents are…".

Housing and Adaptability for Disabled People
Gateshead like many local authorities and housing organisations are struggling to fund adaptations to homes for disabled persons. It is widely believed that by adopting policies for the provision of Lifetime Homes and Wheelchair Housing the cost to adapt such properties to meet occupier needs will be greatly reduced. This is in part a worthwhile assumption that GAP generally supports. However, what does not appear to be generally recognised by the accommodation providers (i.e. LAs and HAs) and developers, is that this does not automatically address the housing needs of disabled people and is unlikely to provide housing that can be affordably adapted for disabled adults and children with high dependency and / or complex needs; where additional space is generally required to accommodate assisted lifestyles and care needs, such as for an ensuite wetroom for assisted bathing / showering.

A policy is required to advocate the design of homes with additional flexibility of accommodation, including potential for future ease of extending, supported by suitable allowances for permitted developments through local planning guidelines that respond to specific impairment related needs; which goes beyond the existing Lifetime Homes and Wheelchair Housing standards.

12. Local Services

12.1. "Securing good outcomes for disabled people may also mean bringing employment and housing services together to improve their well-being and meet emerging needs." (A Vision for Adult Social Care: Capable Communities and Active Citizens, Department of Health, Nov 2010, p.13, 3.14.)

12.2. References to "…centres, which offer **high levels** of accessibility…" are inaccurate and misleading and should be replaced with such as "…centres, which offer **higher levels** of accessibility…"

12.3. Accessibility of the infrastructure, transport, and services as well as the physical access to health, retail, employment, and leisure facilities and services within the centres of the urban core and communities requires continued improvements to meet the physical and cultural access needs of disabled and older people.

No relevant change / update to document, other than the apparent removal of the references to current existence of "high levels of accessibility" as advised above.

13. Promoting Good Place Making

13.1. GAP advises the following changes to the current bullet points in the document:

13.2. Insertion of the word "inclusive" to change the first point to read: "Development will respond to and enhance local distinctiveness, reinforce local characteristics, meet the needs of the local community and be fully integrated to create sustainable high-quality, **inclusive** and interactive places;"

13.3. Extend wording after "…opportunities arise" as per: "Development will take advantage of views and vistas responding to topography and landform where such opportunities arise **without detriment to the needs of the local community, including their need for such developments to support social inclusion**;"

13.4. No suggested change to: "Development will protect, sustain and enhance heritage assets, including those which benefit from statutory protection and those included on Local Lists."

13.5. Addition of wording at end of sentence as per: "Development must not leave heritage assets vulnerable to risk and must, wherever possible, promote the use, understanding and enjoyment of the historic environment **for all**;"

13.6. Extend wording after "…and unique character" as per: "Development along the Tyne must safeguard or enhance its setting in terms of scale, design, landform and integration within the existing urban context, to protect it's

importance and unique character**, as well as providing for inclusive access routes within and for connectivity through the development**;"

13.7. No suggested change to: "Development proposals must demonstrate how they have responded to and incorporated climate change mitigation and adaptation in the design process; and"

13.8. Extend wording after "…and local distinctiveness" as per: "Public Art will be promoted as an opportunity to enhance legibility, character and local distinctiveness**; and wherever possible should aim to support the desired inclusive nature of the environment in which it will play a part.**"

Policy CS17: Promoting Place Making
Revised policy now includes:
1. Development shall be designed to contribute to good place-making through high-quality and sustainable design which creates a strong locally-distinctive sense of place that is safe, inclusive and accessible to all, and that promotes social interaction and a healthy and active lifestyle.

14. Green Infrastructure and Natural Environment

14.1. An additional heading and statement(s) are advised to identify a requirement to respond to the needs for continued development of inclusive access to green infrastructure and green spaces.

14.2. GAP have worked with Gateshead Development and Enterprise to support the development of accessible and where possible inclusive routes and facilities to and within existing some of our more frequently visited green spaces, including Watergate Forest Park, Derwenthaugh Park and the Derwent Walk.

14.3. It is important that the strategy and policy to protect, maintain, and enhance the green infrastructure and natural environments and its benefits to our communities and visitors, also requires that as far as possible accessibility and inclusion issues for visitors are also addressed.

No relevant change / update to document other than at 8.5 "…The aim is to achieve improved access for all to open space, sport and recreation areas."

15. Minerals – no comment.

16. Waste – no comment.

Section 3: Character Area Policies

17. Urban Core

17.1. The reference at 12.11 to the Urban Core being "highly accessible" can by misleading. The definition of "accessibility" in the context of this document is required as an addition to the Glossary: i.e. 'In the context of this strategy document, "accessibility" refers to the existence of routes for pedestrians, public and private transport and the proximity of such routes to the existing and desired locations of housing, employment, and services. This does not specifically relate to access for disabled persons unless stated otherwise.'

18. Neighbourhoods

18.1. "User-led organisations, supported by local councils, can help people come together to reduce social isolation, particularly in rural areas. Happier, more socially connected individuals have more pride in their neighbourhoods, which can enhance quality of life, health and well-being." (A Vision for Adult Social Care: Capable Communities and Active Citizens, Department of Health, Nov 2010, p.12, 3.8.)

18.2. The reference in the draft "One Core Strategy" document at 13.23 to "Promotion of home zones…" fails to recognise the barriers and perceived safety concerns created for disabled persons with impaired physical mobility and sensory impairments. The concerns previously expressed by disabled people in consultation on home zones in Gateshead since 2005 appear to have been ignored.

10.14 in current draft states
"We will aim to introduce 20mph limits in all residential streets and will encourage new developments to be designed on "Home Zone" principles."

Current experience of Home Zones locally has not been satisfactory for many disabled people, and continues to be a concern nationally as well as locally for disability groups, especially where inadequate weighting has been given to their concerns. This experience suggests that design guidelines have not been adequately adopted or employed with regard to home zone designs and their shared surface layouts, where (IHIE) guidance identifies an expectation that vehicle speeds above 10mph will be difficult to maintain through areas of traffic calming measures and features such as street furniture. The desire for retention of distinctive and recognisable delineation between vehicle and pedestrian routes remains an over-riding concern for many, which needs to be recognised in the design brief for any home zone proposal. This will generally be most effective where the pedestrian route is allowed to run parallel to building lines and preferably following straight routes with minimal interruption or deviation; responding to familiar streetscape planning and supporting ease of wayfinding, especially for

persons with sensory impairments. Local guidelines for Home Zones should be developed with the involvement of local disability groups, which will encourage greater confidence in proposals for future home zones.

18.3. Additional funding should be considered and /or sought for alternative transport schemes such as "Dial-a-Ride" schemes.

19. Rural and Villages

19.1. "User-led organisations, supported by local councils, can help people come together to reduce social isolation, particularly in rural areas. Happier, more socially connected individuals have more pride in their neighbourhoods, which can enhance quality of life, health and well-being." (A Vision for Adult Social Care: Capable Communities and Active Citizens, Department of Health, Nov 2010, p.12, 3.8.)

19.2. Proposals for development of Follingsby appears to ignore to some extent the limited transport options for employment at this location, and the resulting high potential reliance on private vehicles; which will also likely be a socio-economic barrier for some people including disabled people.

20. Infrastructure and Developer Contributions

20.1. Reference is made to the "Infrastructure Delivery Plan and the statement that progress in its development is "summarised in the Infrastructure Topic Paper and links to the reports on the above studies can be found there. Comments on this work are invited as part of the current consultation". However, the relevant documentation or links to this have not been found within the consultation document or on the Gateshead Council website.

A "Draft IDP Schedule" can be found only by searching through pages of document download links on the Gateshead Council website. This document is not date referenced, so it is not possible to identify whether this is still a current draft. Access to relevant documents should be easier, with the latest and most relevant documents grouped together to aid access to this material.
Consultation on "Social Infrastructure" and "Community Facilities" needs to be supported by guidance information for communities, to inform their thinking. See comments above under "**Neighbourhoods**" (page 6 of this documents). Such consultation on proposals for "infrastructure " improvements has yet to be achieved in Gateshead.

Delivery and Monitoring – Monitoring and Review

Delivery Framework

12.3 states:

"There are a number of mechanisms for implementing the Plan Policies, they include: Supplementary Planning Documents and other guidance, Development management, CIL, S106s/conditions of planning permission, partnership working, the projects of infrastructure providers and asset management. The main methods and proposals for implementing Plan policy are identified within the supporting Infrastructure and Resources Technical Paper."

The Technical Paper states:

"Assessment of site delivery and plan implementation is also attached alongside the Core Strategy as appendices to this paper. The delivery of Key Sites and other development sites as assessed are attached at Appendix 1. The methods of assessing delivery of the plan policies are also identified and attached at Appendix 2."

Core Strategy and Urban Core AAP: Joint Technical Papers: Infrastructure Overview, September 2011.

Appendix 2 appears to identify how the planned schemes are to be implemented in line with the One Core Strategy and existing national, regional and local policies and guidance. However, this does not identify or reinforce understanding of how the methods of implementation will address Social and Community Infrastructure issues and Community Involvement to support Sustainable Development in accordance with Planning Policy Statement 1 (PPS1).

Stakeholders

"12.5 Stakeholders and service providers have a crucial role in delivering high quality services and improving our infrastructure. Infrastructure plans of partner organisations will help to shape policy and joint infrastructure planning making best use wherever possible, of facility buildings or land. This is an ongoing dialogue, and we will continue to work together to help meet infrastructure needs."

GAP are concerned that this does not appear to recognise or confirm the local community as stakeholders including voluntary sector and community groups, as well as the public authorities, statutory agencies, and service providers.

Monitoring and Review

Statements from 12.10 to 12.14 include:

"Both Council's Local Development Framework Annual Monitoring Reports (AMR) will summarise the results of the monitoring of the Core Strategy. Monitoring will be based on specific indicators and targets adopted for each of our Strategic policies. The AMRs will assess how our policies are performing towards delivering our objectives."

"The monitoring table (see Note to Reader below) will show the indicators and targets we propose to monitor for each of our strategic policies."

"The indicators are selected based not only on their appropriateness, but also on the availability of data. Listed indicators need to have data that is both available at the local level and that is updated on at suitable interval. Where appropriate National targets have been identified, these are included within the framework."

Note to Reader
"…Indicators and targets will be identified for each of our Strategic Policies, to enable us to monitor progress towards achieving the objectives of the Plan and the sustainability objectives identified in our Sustainability Appraisal."

GAP are concerned that there has been a continuing tendency for national, regional and local indicators to fail to recognise the disparities and inequalities that impact adversely on many disabled people, with few indicators even reflecting on disability. The above statements do not provide any evidence to suggest the proposed monitoring tools will be adequately effective with regard to collecting applicable data, identifying limitations and adverse impact on disabled people, identifying respective needs to support disabled peoples involvement in society, or to identify options to mitigate any such limitations and inequalities.

General Comments on the current draft "One Core Strategy, January 2011":

A. There appears to be an overall failure within the "One Core Strategy" documentation to respond to the relevant guidance in "PPS1: Delivering Sustainable Development, ODPM, 2005" and "Planning and Access for Disabled People: A Good Practice Guide, ODPM 2003", including particularly references to inclusive design, improving physical access and increasing opportunities for access and social inclusion.

B. Reliance cannot be placed on the individual strategies and policies that have preceded this document or an assumption that subsequent documents of the Local Development Frameworks (LDFs) will adequately recognise the relevant issues and details to address the issues that impact on physical access and social inclusion for disabled and older people.

C. Such issues as "inclusive design" and "social inclusion" need to be central to the core of the Core Strategy itself and be replicated throughout in all its parts, i.e. stated and demonstrated within all strategies, policies, action plans, and projects.

D. With regard to the consultation and development process for this draft "One Core Strategy" document, the opportunities for involvement of disability and access groups such as GAP have been largely inadequately considered, and our involvement itself has been very late in the proceedings, with little opportunity for this to be adequately resourced within the timeline allowed.

E. The format of the draft document has also created problems for readability of the PDF file and printed versions, which is likely to have resulted in further limitation of opportunity for involvement of some disabled people, especially those with impaired sight. This issue has been further exacerbated by a lack of any link on the Gateshead website to obtain or request the consultation documents in alternative formats.

F. Although further time has been allowed for GAP's review and response to this draft "One Core Strategy" document, the limitation in the strategy development team's planned involvement and consultation with GAP has resulted in our inability to resource a review of the "Urban Core Area Action Plan" within the timescale allowed for this response.

G. Current studies undertaken in preparation of the "Infrastructure Delivery Plan" have not been made available to GAP as part of this consultation, and have

not been found on the Gateshead website. This omission is considered a further barrier to consultation and involvement on the development of this strategy.

H.   As evidence of what steps should have been included in the preparation and development of this draft "One Core Strategy", but do not appear to be evidenced in the document, the following example texts are offered for reference:

"(iv) Planning policies should promote high quality inclusive design in the layout of new developments and individual buildings in terms of function and impact, not just for the short term but over the lifetime of the development. Design which fails to take the opportunities available for improving the character and quality of an area should not be accepted (see paragraphs 33 – 39 below).
(v) Development plans should also contain clear, comprehensive and inclusive access policies – in terms of both location and external physical access. Such policies should consider people's diverse needs and aim to break down unnecessary barriers and exclusions in a manner that benefits the entire community."
(PPS1: Delivering Sustainable Development: National Planning Policies – Key Principles, ODPM, 2005.)

"15. Regeneration of the built environment alone cannot deal with poverty, inequality and social exclusion. These issues can only be addressed through the better integration of all strategies and programmes, partnership working and effective community involvement.
16. Development plans should promote development that creates socially inclusive communities, including suitable mixes of housing. Plan policies should:
– ensure that the impact of development on the social fabric of communities is considered and taken into account;
– seek to reduce social inequalities;
– address accessibility (both in terms of location and physical access) for all members of the community to jobs, health, housing, education, shops, leisure and community facilities;
– take into account the needs of all the community, including particular requirements relating to age, sex, ethnic background, religion, disability or income;
– deliver safe, healthy and attractive places to live; and,
– support the promotion of health and well being by making provision for physical activity."

(PPS1: Delivering Sustainable Development: Planning For Sustainable Development - Social Cohesion and Inclusion, ODPM, 2005.)

"42. Planning authorities should build a clear understanding of the make-up, interests and needs of the communities in their areas. Communities will be made up of many different interest groups, for example, relating to a particular place, issues (such as access for the disabled, local environmental quality, or support for small businesses), values or religion. Some of these will be well established and represented. But some groups may be less well equipped to engage with the planning system. An inclusive approach should be taken to ensure that different groups have the opportunity to participate and are not disadvantaged in the process. Identifying and understanding the needs of groups who find it difficult to engage with the planning system is critical to achieving sustainable development objectives.

43. Community involvement in planning should not be a reactive, tick-box, process. It should enable the local community to say what sort of place they want to live in at a stage when this can make a difference. Effective community involvement requires an approach which:

– tells communities about emerging policies and proposals **in good time**;

– enables communities to put forward ideas and suggestions and participate in developing proposals and options. It is not sufficient to invite them to simply comment once these have been worked-up;

– consults on formal proposals;

– ensures that consultation takes place in locations that are widely accessible;

– provides and seeks feedback."

(PPS1: Delivering Sustainable Development: Community Involvement, ODPM, 2005.)

I.   The Department of Health and Department for Transport have recently published guidance in response to the requirement for Local Transport Plans (LTPs) to be assessed through Strategic Environmental Assessment (SEA) (European Directive 2001/42/EC) as an integral part of developing, appraising and later, delivering LTPs.   "Addressing human health is a key requirement of the SEA directive, and health impacts are also covered in the statutory duty to assess for the Impact on Equality, which will need to be carried out for all LTPs."

The following extracts are provided for reference, which will also have relevance inherently to the proposed "One Core Strategy" generally and in particular for "Policy 5: Transport and Accessibility" and the Urban Core:

- "personal barriers to active travel vary within community groups and between commuter types. Addressing and removing such barriers requires an appreciation as to local circumstance, demography, age structure, community and commuter needs and perceived risks (this can be achieved through community profiling and engagement);
- barriers for older people and those with disabilities often include perceptions of safety and risk of injury on the way to public transport or while waiting for modal interchange. There is therefore a requirement to engage with such groups in order to ascertain such barriers and the best way in addressing them; and
- barriers limiting the uptake by vulnerable community groups may include concern of personal safety and crime. Defining such issues during consultation will aid in developing bespoke initiatives, aid in addressing health inequalities and support the delivery of LTPs."

"8.7 Private vehicle use presents a number of environmental health risks that are typically disproportionately dispersed within socio-economically deprived communities and vulnerable community groups. Such risks are in part being addressed through improvements in vehicle technology and safety features, and more strategically through LTPs. LTPs can also be applied to encourage more active and healthier lifestyles, with significant health protection and promotion benefits. However, it is important to note that transport options geared towards a modal shift away from private vehicle use, may have a particular impact upon vulnerable community groups (i.e. communities in rural and suburban areas, the older people, people with disabilities etc)."

"8.8 In order to not widen socio-economic and health inequality, additional initiatives may be required to ensure that such community groups do not result in a decrease in access and accessibility or become isolated. The primary means of addressing such issues is through effective consultation with such groups to establish their relative transport needs and current barriers limiting access and accessibility."

(Transport and Health Resource: Delivering Healthy Local Transport Plans: Suggested Transport Mitigation and Community Support Initiatives: Transport Mode 8.5 - 8.8, p. 68 - 70, Department of Health and Department for Transport, 20 January 2011.)

J. The above quoted Government guidance makes reference to 'social cohesion and inclusion' and the need for consideration and involvement of the "community" and "community groups" as a collective, whereas the intended

meaning is much wider. As all to often is found within government documents, this shorthand approach to addressing or visualising the local "community" as one body or group unnaturally infers or is interpreted as a group with broadly similar characteristics or needs: whereas in fact, it is aiming to address groups with varying characteristics and needs. The references to community in such documents therefore, and in this instance in the 'One Core Strategy', should be more correctly or appropriately stated and should be recognised as meaning community and voluntary sector and / or groups.   So by the same principle, where the 'One Core Strategy' refers to community, it is equally important that similar qualification is given where this is intended to include the voluntary sector. It is also vitally important to recognise that involvement of community groups and community representatives is unlikely to provide adequate or meaningful involvement of voluntary sector groups or adequate representation of the individual equality groups; as the latter have more specific needs and requirements and therefore require more specific involvement. For example, Gateshead Development and Enterprise recognised the importance of appointing an Access Officer in 2007 and their increased need and duty to involve disabled people and their carers, such as in consideration of their proposed implementation of policies, strategies, and development of proposed schemes and plans; which led to D+E's partnership activities with GAP in setting-up the DESUIF (Disability Equality Service User Forum) and Access Champion roles within each service. GAP's central role was recognised as a pan-disability group and user-led organisation (ULO) working to support disabled people and carers across the impairment spectrum, with contacts and working relationships with a wide number of other voluntary sector groups in Gateshead and the region.

Note: GAP is currently the only ULO in Gateshead recognised by DoH (Department of Health) criteria.

Steve Hudson
Design and Access Consultant
GAP Consultancy
Gateshead Access Panel
Tel: 0191 443 0058
Direct Line: 0191 416 6560
Email: accessconsultant@btinternet.com
Website: www.access-gateshead.org.uk

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