
(a) The Wychavon Accessible Historic Environment Supplementary Planning Document (SPD) was adopted by Wychavon District Council on 10th January 2006.

(b) Any person aggrieved by the SPD may apply to the High Court for permission to apply for judicial review of the decision to adopt the SPD.

(c) Any such application for leave must be made promptly and in any event not later than 3 months after the date on which the SPD was adopted.

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Supplementary Planning Document

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Preface

This Supplementary Planning Document (SPD) discusses some of the Planning and Conservation issues surrounding the provision of access for all to the historic buildings and historic designed landscapes of Wychavon.

The document builds on Government Guidance, such as that contained in PPG15, and is concerned with reconciling the interests of conservation and access in the light of the reasonable adjustment provisions of Parts I, III and IV of the Disability Discrimination Act 1995, the inclusion of existing buildings within Approved Document Part M (2004) of the Building Regulations (2000), and the provisions of the new British Standard on Access BS 8300 (2001) Design of Buildings and Their Approaches to Meet the Needs of Disabled People: Code of Practice; the policies of Wychavon District Local Plan and guidelines published by national bodies such as English Heritage. It should therefore be read in conjunction with those documents.

If they are to be successful, any development proposals that may have an impact on historic properties should address those specific issues identified by the District Council in this document.

Historic buildings and places should be accessible to everyone, including people with mobility or sensory impairments, older people, parents with small children and anyone who is temporarily disabled as a result of illness or injury. Owners and managers of historic properties with public access must commit themselves to creating an environment in which this can be achieved.

The word “access” is widely interpreted to include access to and within any building or site, and access to all facilities and services. The objective is to provide, as much as is reasonably achievable, a barrier-free environment for all. Part M of the Building Regulations covers this area.

Providing access to services and buildings for people with mobility and sensory difficulties is required under the Disability Discrimination Act 1995. Nevertheless, there is also a distinct need to conserve historic places and not to alter them in ways that adversely affect their architectural or historic interest.

The purpose of this Supplementary Planning Document is to establish a balance in such situations between the legal need to provide accessibility and the legal duty of the local authority to give special consideration to the preservation of historic buildings, conservation areas and historic landscapes. Objectives of both sets of legislation may not always overlap.

Historic buildings play an important part in communicating history to present and future generations, and constitute a considerable percentage of the existing built environment. As well as private homes and shops, they include civic buildings, such as town halls, post offices and court buildings, places of worship, and places of social gathering such as community halls and hotels.
Planning access solutions will be unique to each historic building. Consequently, standardised design or blanket approaches would be inappropriate. However, adopting a process that combines an understanding of the two fundamental principles of equality of access and heritage conservation with practical outcomes will assist managers, users and designers to achieve effective and acceptable solutions.

There will be some cases where access is not feasible if the heritage asset is to be adequately preserved. These will be few: innovative thinking will usually provide an acceptable solution.

Reference should be made to the Cotswold ANOB Management Plan Policy TOP4 and actions TOA1 and TOA7 where development proposals for disabled access involving listed buildings, settings and conservation areas, historic parks and gardens and designed landscapes fall within the Cotswold AONB.
1.0 Access and the Historic Environment

1.1 Background
The Disability Discrimination Act 1995 (DDA) was introduced with the aim of opening up access to facilities in a way that provides (as far as possible) identical access for all, this is an important principle to bear in mind when considering the implications of the DDA. This document deals primarily with proposals which affect listed buildings, but can be applied to all historic buildings and landscape and the historic environment as a whole.

Our protected buildings, landscapes and monuments are part of our cultural identity. They are irreplaceable but sometimes they need to be changed for the building's continued viability. These benefits must be balanced against the potential damage alterations may cause to the significance of the building itself. The general presumption is in favour of the preservation of listed buildings except where a convincing case can be made for their alteration. This principle is embodied in current listed building legislation and national policy guidance, which seeks to prevent unnecessary demolition and inappropriate or insensitive alteration.

By following the careful process of research, described below, in most cases, access can be improved without compromising the special interest of the historic building. There is therefore ample scope for early pre-application discussions between the local planning authority and relevant parties for reaching acceptable solutions to providing access to historic locations.

1.2 Requirements of the Disability Discrimination Act
All employers and all service providers need to comply with all the requirements of Part III of the Disability Discrimination Act from October 2004. The Act states that service providers have a duty to make reasonable adjustments to make services fully accessible to disabled people. That is all those who have a 'physical or mental impairment, which has a substantial and long-term adverse effect on ability to carry out normal day to day activities'. The duty to make reasonable adjustments is an 'anticipatory duty', service providers are required to anticipate the needs of people with disabilities and provide for them in a wide variety of ways. **The Disability Discrimination Act does not override other legislation such as listed building or planning legislation, and the need to obtain appropriate approvals still applies in the case of changes made to improve access.**

Where a physical feature makes it impossible or unreasonably difficult for disabled people to make use of services, a service provider must make reasonable adjustments to:

- **remove** the feature; or
- **alter** it so that it no longer has that effect; or
- provide a reasonable means of **avoiding** it; or
- provide a reasonable **alternative** method of making the services available.
The 'physical feature' in this context is a feature arising from the design or construction of a building or the approach or access to premises. Physical features include furniture and displays which make it impossible or unreasonably difficult for disabled people to use the service provided.

1.3 General Approach to Making Reasonable Adjustments
Where there is a physical barrier, the service provider's aim should be to make its services accessible to disabled people. Important guidance on what is likely to be reasonable in historic buildings and landscapes can be found in the Disability Discrimination Act 1995: Code of Practice: Goods, Facilities, Service and Premises produced by the Disability Rights Commission. Historic Buildings should be made accessible to disabled people, wherever possible, without compromising conservation and heritage issues. The extent to which the Codes recommendations apply to listed and historic buildings is determined on a case by case basis, reasonable steps would be dependant on 'all the circumstances of the case' varying according to:
- the type of service being provided;
- the nature of the service provider and its size and resources;
- the effect of the disability on the individual disabled person.

Factors which might be taken into account when considering what is reasonable:
- whether taking any particular steps would be effective in overcoming the difficulty that disabled people face in assessing the services in question;
- the extent to which it is practicable for the service provider to take the steps;
- the financial and other costs of making the adjustment;
- the extent of any disruption which taking the steps would cause;
- the extent of the service provider's financial and other resources;
- the amount of any resources already spent on making adjustments;
- the availability of financial and other assistance.

Provisions of the Code of Practice must be taken into account, though they are not in themselves binding.

What are a service provider's obligations in respect of physical features?

- **Removing the physical feature**
Removing the physical feature may be a reasonable step, and the most effective one, for a service provider to take. Physical features often create barriers that impede disabled people accessing services. Examples of this are widening of doors and construction of ramps to enable access to buildings by those in wheelchairs.

Service providers are urged by legislation to adopt an 'inclusive' approach to ensure that the service provided is enjoyed by all in the same way. It is better
to widen or adapt the door into the building rather than construct a separate one to be used only by the less mobile.

However, the requirement is to take only such steps as are ‘reasonable, in all the circumstances of the case’ and may be difficult to achieve satisfactorily if the building is of historic interest.

Where this is the case 'additive' change rather than 'destructive' change in the form of a reversible semi-permanent solution may be most appropriate. To determine whether this complies with reasonableness it will be essential to assess the relative contribution the affected features make and to set this against costs and benefits which removal might bring. Frequency of use may be significant when making this assessment.

- **Altering the physical feature**
  Solutions, which do not adversely affect the historic fabric should be considered, including sympathetic reduction rather than removal of physical features. Where it is not possible to comply fully with design standards recommended in BS 8300 or Approved Document M of the Building Regulations an Access Statement should be used as a way of reconciling the access issues in order to achieve a 'reasonable adjustment'.

- **Providing a reasonable means of avoiding the physical feature**
  Providing a reasonable means of avoiding the physical feature may also be a reasonable step for a service provider to take. This may avoid the need to make damaging alterations to a listed building or its elements. This could be achieved by changing the way the building is managed, by provision of preferred secondary access routes, whilst still maintaining the principal entry. Proposals for alternative solutions should be detailed in an Access Statement prepared by the service provider.

- **Providing the service in another way**
  This is the minimal level of provision and will not be considered reasonable if one of the other options above could have provided an integrated service for all users. Disabled users should be consulted to establish the acceptability of providing the service in a different way to that offered to others.

  This option might include:-
  - Relocating services from the upper to ground floor
  - Using print and computer technology
  - Adjusting circulation routes to avoid stepped thresholds and narrow doorways

**2.0 Determining Reasonableness**

**2.1 The Access Strategy**
It is essential to establish an access strategy. Any organisation that is required to make reasonable adjustments under the DDA will need to make a commitment at high level to make the service more inclusive. Measures subsequently identified in the access planning process, should be made the
responsibility of someone who should oversee, evaluate and review any measures considered necessary. The needs of people with disabilities and the options available to meet those needs should be fully considered before works are undertaken.

2.2 Access Audit
An access audit will be required to assess and document barriers to access for all users which exist within a building and its surroundings. This should be undertaken in advance of proposals to improve access.

To comply with the requirements of the DDA a provider must consider:-

- What services are being or might in the future be provided
- What barriers there might be to everyone being able to take advantage of those services

A list must then be compiled of all the changes that could be made in the way a service could be provided, or, in relation to the building where it is provided, enable those barriers to be removed or avoided. This is the ‘access audit’.

The changes should be costed and a list of priorities made, necessary works should then be carried out. Where the changes are financially significant work does not need to be carried out all at the same time but completion should not be delayed for too long. A written record should be kept at all stages about what is to be done, what has been considered and what has been rejected in the event of possible future defence to a claim under the Act.

Professional practitioners in access audit are listed in the National Register of Access Consultants. It is also possible to purchase an Access Audit Pack from the Disability Rights Commission.

2.3 The Conservation Assessment
The conservation assessment is a complementary part of the process, which establishes the relative significance of a building in terms of its special architectural, historical or archaeological features. If a Conservation Plan exists, the significance of the place and its associated elements should have been adequately defined. Where a Conservation Plan does not exist or the significance is not adequately defined, it is vital to identify overall significance and important elements, and what must be protected from change. A specialist conservation professional may be required to assist this process or to review existing information. Architectural historians or conservation architects usually prepare these although amenity societies and local authorities may also be a source of guidance.

The historic value of a place can lie in its construction materials, its style, principal elevations, major architectural or landscape features or principal public spaces. Every effort should be made to minimise damage to original materials, fabric and elements that contribute to the significance of the place. It is critical that this significance is clearly defined and understood. Alterations
should, as far as possible, be reversible, especially if these involve change to the original fabric.

Secondary spaces and less important elements should also be identified, as these may possibly be altered without adversely affecting the primary significance of the place. Items of low importance are more amenable to alteration without detrimentally affecting the overall historic character or appearance of a place.

2.4 The Access Plan
When the access audit and conservation assessment have been completed the access plan can be prepared. This should reconcile the needs of access and conservation, and will involve assessing the significance of the building and its setting and the access needs of users.

The process of preparing the access plan should consider the options available, including providing the service by other means. The access plan can seek to employ best practice in access design and building conservation, recognising that for financial and operational reasons, work may need to be phased over a period of time and that alternative service provision may be necessary during any physical works.

The plan should address the needs of all possible users including wheelchair users, people with restricted mobility, sensory impairments, learning difficulties, older people and parents with small children. It should be central to an organisation’s strategic commitment to improving access and needs to be reviewed periodically to keep provision up to date and take account of any changes in regulation and in available solutions. Proposals can be tested with the help of people with disabilities drawn from local access groups.

The plan can be used to inform any Access Statement required under Approved Document Part M of the Building Regulations. Departure from the guidance set out in Approved Document Part M must be justified by the ‘Access Statement’ which should accompany planning applications affecting listed buildings and conservation areas. In the case of an historic building, the statement will allow the designer to identify the constraints posed by the existing structure and its immediate environment. Where full access proves to be impracticable or only achievable at disproportionate cost compensatory measures can be proposed.

The ‘Access Statement’ is a way of showing that every effort has been made to provide an inclusive environment and that it is not being used as justification to lower standards of access provision.

3.0 Understanding Architectural Character

3.1 Entrances
The historic buildings' design and character will inevitably have an impact on accessibility. The façade, in particular should be respected when considering the preferred access entrance, generally this will be the main entrance to
satisfy the ‘inclusion’ element for the DDA. Classical styled buildings follow strict rules of symmetry and proportion and frequently the entrance is set on a raised base approached by a flight of steps. Classical rules of symmetry should be respected when any alterations are proposed, though this does not mean that there can be no relatively small scale changes as long as they do not affect the appearance significantly. Buildings in Gothic and other styles are generally not as affected by symmetry of design but proportion and balance must be a consideration.

If space is limited, generally in urban locations, regrading pavements up to or within a porch or portico may be a solution. Where Georgian and Victorian terraces have steps to the front door, consideration should be given to alternative entrance points. Where a basement exists between the pavement and building it may be possible to install a platform lift, adaptation of steps, railings and landing can be in keeping with existing design.

### 3.2 Physical features

Architectural features should be understood in their own right and in the context of the building. Efforts should be made to disturb or obscure these features as little as possible where they contribute to the building's significance, character or composition. Features arising from design or construction include; architectural details such as plinths, column bases, staircases, ironwork and door openings, fixtures, fittings, furnishings, furniture, equipment and other materials. Additional features to consider are those arising from the external physical elements and setting including; kerbs, exterior surfaces, paving, parking areas, trees and planting, building entrances and exits and emergency escape routes.

It is important for service providers not to assume that the only way to make services accessible to disabled people is to make a physical alteration to premises. Minor measures such as paying special attention to take more time to serve a disabled customer will help the disabled person to use the service. Early pre-application consultation with Wychavon District Council Planning Services is advisable.

### 4.0 Practical Access Solutions

Horizontal and vertical movement throughout an historic building may be constrained by, floor surfaces, doors and openings, thresholds and small and large changes in level. Alterations to these can impact upon the appearance and significance of the building. It may not always be possible to conform strictly to Approved Document Part M of the Building Regulations but the aim should be to achieve a balance between reasonable adjustment and the historic building. It is essential that detailed design studies, supported by accurate drawings and visualisations ensure that any intervention is properly planned and the impact fully understood.

Staff training in disability awareness is likely to be appropriate. If minor measures do not overcome barriers to access then physical alterations may be the only answer. Best practice is the 'inclusive’ approach to adjustments to
make services available to everyone in the same way. Generally providing an ‘alternative’ method of service offers disabled people a different form of service than is provided for non-disabled people.

4.1 Doors and openings
Door and window openings should not generally be altered in their proportions or detail as these are likely to be significant. Internal spaces provide a greater opportunity to have doors left open, closed doors normally must have a clear width at least 800mm to permit easy access by wheelchair users. Compromise may be possible, Approved Document Part M suggests a minimum clear width of 750mm in existing buildings.

Wheelchairs can inadvertently damage narrow doorcases, it may be necessary to safeguard historic fabric by use of applied protection.

Historic door furniture or traditional ironmongery may be integral to the design and character of the door and every effort should be made to retain it. It may be possible to automate the door or to rely on staff assistance rather than replace significant fittings with lever type handles. There are a number of aids available that can be used with existing door furniture for those with limited grip.

- handles should be at an accessible height (less than 1100mm),
- door knockers or bells should be at an accessible height,
- handles should be able to be easily turned, lever handles are better, but if the handles are significant the original ones should be retained.
- there should be no obstacles such as mats.

If doors are not wide enough, it may be possible to increase the effective opening width by joining two leaves together, or by fitting offset hinges.

A door should not be too heavy or difficult to open. If heavy, assistance may be required by mechanical or electrical means, such as automatic or power assisted doors. Closers are available that can be made automatic for wheelchair users and manual for other users. Operation can be by beams, touch pads or pressure sensitive mats. Siting of touch pads should be carefully considered in relation to their setting.

Management options can be adopted, which will have few permanent impacts on the historic fabric. While the building is open, where appropriate, the door can be kept open, thereby overcoming most access-through-door issues, provided it is wide enough.

It is essential to ensure there is sufficient space beside and in front of the door, particularly on the handle side, to enable a wheelchair to manoeuvre through it.

Sometimes there is more than one door into a room, with one accessible and the other not. This may mean guiding people through a place by entering through the accessible door, rather than trying to overcome the problem of the
narrower door. If doors and doorways are not original and not significant, widening them can be considered. Widening should only be considered after an appraisal of the age and sensitivity of surrounding fabric has been made.

4.2 Thresholds
Raised thresholds can be a barrier to wheelchair users or a trip hazard, these can be removed or overcome by adding threshold ramps or adjusting levels to remove the step. Worn thresholds are also a concern, especially for wheelchair users, and therefore may require replacement or building up in ways that do not affect the essential historic character. In timber framed buildings cutting sill plates or other framing members would compromise the structural and historic integrity of the building. Small differences in height can be overcome by use of a bevelled fillet on either side. Raised thresholds up to a maximum of 25mm can be manoeuvred over in a wheelchair, portable bevelled leading edges or short ramps can be provided to assist. Sill plates which are to be covered by a raised floor or ramp should have adequate ventilation to avoid increasing moisture levels which can lead to timber decay.

4.3 Ramps
Ramps can be used by wheelchair users, ambulant disabled, older people and people with pushchairs. Platform lifts, may be necessary where there are larger changes in level involving extensive ramping, inadequate space, or where there is an established need to protect architectural or archaeological features. Standard guidance advises a maximum of 1:12 rise over 2 metres, cases for use of a steeper ramp to that recommended in Approved Document M would need to be made in the Access Statement. When considering permanent ramps and raising floor levels, design features such as skirtings, plinths and dado rails should be taken into account. Handrails should be sensitively designed in keeping with context.

- **Temporary ramps** are unlikely to provide a long-term solution, but may, however, be considered a reasonable adjustment if they form part of a long-term strategy prior to providing a permanent solution. Any temporary measures should be of high standard and quality, seeking to minimise visual impact and provide an integrated and independent access.

- **Portable ramps** may provide a solution where use would be very infrequent. This might be suitable for an occasional single visitor or for periodic events lasting a few days. This option involves staff intervention, appropriate training and storage space for the ramp. A temporary or portable ramp provides the most acceptable solution whilst a long-term solution is being prepared. Many ambulant disabled people do not find ramps easy to use. Steps should be provided as well as the ramp unless the ramp is short with a shallow gradient and has a rise that is no more than the minimum provided by two risers. Portable ramps should be removed and stored nearby (this kind of ramp can prove to be a hazard to the partially sighted). Availability should be advertised in advance.
4.4 Stairs and landings

Historic principal staircases often do not comply with current standards but changing them is likely to be contentious. This may not be a problem if there is a secondary staircase where alteration may be acceptable.

- **Handrails** represent a critical design issue and even where sensitively designed will inevitably have impact on character. Proposed handrails should be in keeping with context, match existing designs and materials and may not be necessary where alternative access is available, for example a lift, within reasonable proximity. Replication of existing handrail design may not fully comply with the *Approved Document Part M* but could otherwise be regarded as a reasonable adjustment. Where alterations are proposed and conservation and aesthetic considerations require the retention of non-compliant but historic handrails then this issue should be raised in the Access Statement. **Advice should be sought from the Conservation Officer at an early stage in the design process.**

To comply with current standards: -

- handrails should be on both sides where there are flights of 2 or more steps with a 1m unobstructed width between them, on wider steps it can be less intrusive to install a single central handrail, on narrower stairways there should be at least one good handrail
- handrails should extend 300mm beyond the first and last riser (upright face of a step)
- handrails should not be too thick or thin to grip (not more than 50mm or less than 40mm), it may be possible to insert an additional handrail in order to comply.

**Hazard warning surface texture and contrasts** used on external and internal steps and landings may be undesirable in historic buildings. It might be possible where stairs represent a safety hazard for people with visual impairment, to use carpeting or lighting to improve contrast or reversible paint to identify the edges of steps and landings.

4.5 Passenger Lifts

A passenger lift is the most suitable means of vertical access and should be provided wherever possible. In historic listed buildings where it is not possible to install the type and size of passenger lift that would be suitable for use by all, other options can be considered to provide for users with mobility impairments:

- a lifting platform, of a type designed for the vertical height to be travelled;
- a wheelchair platform stairlift serving an intermediate level or a single storey but only in exceptional circumstances and only where there are no decorative or sensitive historic surfaces for example dadoes or panelling.

The case for using any of these options should be argued in the Access Statement.

Lifts should be located in less sensitive parts of the historic buildings, for example, secondary staircases, light wells or previously disturbed or altered areas.
Wheelchair users need sufficient space and time to enter and leave a passenger lift, particularly when sharing it with other people. The lift car should be large enough to accommodate any type of wheelchair with at least one other passenger. Lifts with a clear turning circle of 1.5m are desirable for heavy visitor use.

**Smaller car lift:** Where a smaller car is the only option 80% of wheelchair users can cope with a smaller lift. The minimum car size for a passenger lift is 1.4 x 1.1m this will accommodate one wheelchair and one passenger. Wherever possible the lift should operate as a through lift so that the wheelchair user does not have to turn round or reverse to exit. This also applies to short-rise platform lifts.

**Short-rise Platform lift:** For changes of level between 1m and 4m partially enclosed cars specially designed for wheelchairs can be used instead of the above lift types. This type of platform lift offers integrated access beneficial to all types of user. Modern technology reduces or avoids the necessity for overruns or lift pits and the lift can travel up to 4m in an enclosed shaft. Use is mainly internal but external use is increasing. This type of lift requires high levels of maintenance and supervision but is less obtrusive than a long ramp with handrails. Minimum platform size required for a wheelchair is 1.05m wide x 1.25m long.

**Incline stair lifts:** These are inevitably intrusive and cannot be fitted to a staircase where they may create a hazard if the width of the stairway is reduced to less than the acceptable minimum for an escape route. They cannot be used by those unable to transfer from their own wheelchair and tend to be unpopular with wheelchair users in general. They should be considered only as a last resort where it is impossible to fit a vertical lift or ramp.

**Stair climber:** These have significant drawbacks and do not generally offer a suitable solution for all wheelchair users, in addition they may cause damage to stair treads though the technology is improving.

**Emergency egress:** British Standard 5588 Part 8: Code of Practice for Means of Escape for Disabled People gives guidance on assisted escape and sets out standards for evacuation lifts. Revised part M of the Building Regulations states that where a lift is to be used to evacuate disabled people in an emergency then it should conform to the relevant recommendations of BS 5588 Part 8. Evacuation lifts are increasingly being used in preference to carrying a wheelchair user down the stairs or using stair climbers.

### 4.6 Toilet Facilities

In most places one unisex toilet is all that is required. Toilets can be incorporated in less significant rooms (usually bathrooms that obviously have been modified), for example, store rooms or external rooms. Turning spaces for wheelchairs must be a minimum of 1500m diameter, not including fitments or baby changing facilities. Colour contrast is essential for the visually impaired.
impaired, walls, floors, grab rails should contrast with sanitary ware. Alarms should ideally be connected to a permanently staffed point.

Minimum dimensions and layout for unisex toilets can be found in Approved Document M.

4.7 Sensory
- Visual: Colour contrast will assist visually impaired people. This does not have to be extreme - tonal contrasts are useful. Printed information should be in large print format.
- Sound: Consider provision for people with hearing loss: induction loops at information points, sounds can be distorted and muffled by hard or carpeted floor surfaces, printed material should be available.

5.0 Historic Settings and Landscapes

Where the service that is being provided is within the setting of a listed building or in the historic designed landscape the same considerations will apply to landscape and setting as to historic buildings. Additionally an Historic Landscape Assessment and Environmental Impact Assessment may be required, these are surveys undertaken by appropriate specialists. It is therefore essential that prior to formulating proposals for access there should be prior consultation with the Conservation Officer. This section should be read in conjunction with Wychavon District Supplementary Planning Document: Historic Parks and Gardens. The Disability Discrimination Act does not override other legislation such as listed building or planning legislation, and the need to obtain appropriate approvals still applies in the case of changes made to improve access.

Principles to be applied when determining what is reasonable in terms of the Disability Discrimination Act are described in 1 above. The following should form part of the assessment and formation of the Access Plan as described in 2 above.

- The Access Strategy
- Access Audit
- Historic Landscape Assessment
- Environmental Impact Assessment
- The Access Plan

An Access Statement is a way of showing that every effort has been made to provide an inclusive environment and that it is not being used as justification to lower standards of access provision. A written record should be kept at all stages about what is to be done, what has been considered and what has been rejected in the event of possible future defence to a claim under the Act.

When considering what would be a ‘reasonable adjustment’ any works should be of ‘additive’ change rather than ‘destructive’ change in the form of a reversible semi-permanent solution that may be most appropriate. To determine whether this complies with what is reasonable it will be essential to
assess the relative contribution the affected features make, and to set this against costs and benefits which removal might bring. Frequency of use may be significant when making this assessment.

Accessibility Standards and an audit checklist can be found in BT *Countryside for All Standards and Guidelines*.

It is essential that detailed design studies, supported by accurate drawings and visualisations ensure that any intervention is properly planned and the impact fully understood.

5.1 Landscape Character and Appearance

Design and character will inevitably have an impact on accessibility in historic landscapes and settings. Garden design should be respected though this does not mean that small scale change cannot be made, so long as appearance is not significantly affected.

Commonly the value of landscape is in its current state as the sum of various styles of development as they were laid out or altered in response to contemporary fashions. Phases of development may be overlying or existing alongside earlier works, each having its own degree of interest and impact on the landscape. Architectural features should be understood in their own right within the context of landscape and buildings. Effort should be made to obscure or disturb these features as little as possible where they contribute to significance, character or composition. Features arising from design or construction include, lodges and gates, steps, walks and drives, parkland, ha-ha, pleasure grounds, ornamental planting, kitchen garden, water features, garden buildings and ornaments.

Areas of secondary importance such as altered paths should be identified, especially those where modifications for access will not destroy the landscape’s significance. A sympathetic circulation experience can then be developed, after identifying those features that do or do not contribute to significance.

5.2 Landscape Solutions

A route around a site can vary depending on the capability of people, so a range of options can be presented to all users. While this is not a perfect solution, people can then select the best option for themselves. Routes can be specially designed for wheelchairs, people who cannot walk very far, or for visually impaired people. This flexibility is a practical way of overcoming access problems without the need for extensive alteration to create a single route accessible to everyone at all times. Good conservation practice involving the historic landscape should not compromise the potential for repairs to historic landscape in the future.

Reference should be made to BT *Countryside for All Standards and Guidelines* for information on how to comply with accessibility standards in the countryside.
Path widths should be a minimum of 1200mm, 815mm at a gateway and 2000mm for free movement of two-way traffic for all including wheelchair users and double pushchairs. Path edging is not essential but there should be a clear visual distinction between path and adjoining ground. Passing places should be provided every 50m where the path is less than 1500mm wide. Path gradients should be a maximum of 1:12 for wheelchair users. Gradients for wheelchair users steeper than 1:20 will require landings at appropriate distances apart. To be accessible paths should be compact and firm, stable, nonslip and obstacle free.

There should be a clear walking tunnel directly above a path extending to 2100mm, with a clear width of 1200mm for the visually impaired. Mounted objects must not protrude more than 100mm into paths or trails.

Bridges and boardwalks need a clear minimum width of 1200mm for one-way traffic and 2000mm to two-way traffic. Risk assessment should be done where there are gradients, sharp turns and other hazards; edge boards and handrails should be considered.

Steps, gates and stiles create barriers to many people with disabilities. Some ambulant people will find steps more convenient than ramps, so provide both where possible. Historical steps may not comply with current standards but changing them is likely to be contentious. This may not be a problem where an alternative can be provided. Gates can be left open wherever practicable.

Seats and perches should be placed at regular intervals to enable ambulant disabled and elderly people to rest.

Ground surfaces
- Depth and size of loose surface material is important, existing gravel surfaces can be replaced with self-binding gravel or by adding binding agents such as bitumen or resin.
- Hoggin (a type of pathway made of self binding gravel) may provide a suitable surface for all to use while still being appropriate for the historic landscape context.
- Stone setts can be relayed with tighter joints, or pointed to form a less recessed joint, or a level surface can be incorporated within them so that they are more accessible.
- Forming dropped kerbs generally requires tactile paving, in sensitive locations continuation of natural stone is the preferred option.

Where the historic environment would be otherwise compromised implementing management measures may provide a reasonable adjustment
- Introduction of alternative routes through a park or to a building, and signing them accordingly.
- Introducing alternative routes, which give access to certain key features and views within the landscape, while acknowledging that full access, may not be possible.
• Using interpretation and alternative media to provide intellectual access to those areas that will remain physically inaccessible.
• Providing handrails, electric buggies and frequent resting places to maximise access for as many people as possible.
• Use of trained staff and guided tours as opposed to making physical changes.

Sensory
• Taking full advantage of the sensory qualities of all gardens and landscapes and of seasonal changes

Parking
Parking should be provided as close as possible to the principal public entry with clear sign-posting. Often spaces close to buildings are reserved for staff, but there is always the possibility of indicating “Staff or disability permit holders only” or something similar.

Access is needed from a parking space to the pathway system. A properly constructed dropped kerb, or level access to the path can usually achieve this.

A sealed surface (concrete or bitumen) is best, but a well compacted or cement stabilised gravel can be suitable and, in many rural settings, more appropriate. Loose gravel is a problem for wheelchairs, which have difficulty in traversing it. It can also be unbalancing for others with physical impairments. Gravel can be embedded in a sub-base such as bitumen. This gives the impression of gravel, but is quite firm.

Summary of Principles
Each case must be individually and carefully assessed. Nevertheless some general principles do apply:

General approach

1. Review the significance of the place and identify the elements of greatest significance.
2. Undertake an access audit to determine the location’s existing and required level of accessibility.
3. Evaluate accessibility options within a conservation context.
4. Establish a policy on access and conservation and prepare an access plan
5. Obtain any necessary consents.
6. Implement the access plan.

To conserve heritage significance

1. Make alterations sympathetic to the original building.
2. Ensure designs are reversible.
3. Ensure new material is evident on close inspection.
4. Preserve items of higher significance if a compromise is required.
To provide access

1. Make the main or principal public entrance accessible wherever possible.
2. Ensure an accessible path of travel to all areas and facilities.
3. Where toilets and facilities are provided, ensure that at least one is accessible to disabled users.
4. Methods of interpretation and communication should aim to be suitable for all users, and for a range of disabilities.
5. Use modern technology and methods where appropriate if it makes access easier.
6. Train staff and volunteers to understand the needs of people with disabilities and best means of ensuring adequate and equitable access.

References

Primary Legislation:
*Disability Discrimination Act* 1995, HMSO
*Planning (Listed Buildings and Conservation Areas) Act* 1990, HMSO
*Town and Country Planning Act* 1990, HMSO

Official Guidance Documents:
*Planning Policy Guidance Note 15*:
Planning and the Historic Environment, HMSO

Department of the Environment (1990).
*Planning Policy Guidance Note 16*:
Archaeology and Planning, HMSO

*Building Regulations* (2000)
*Access to and Use of Buildings*, HMSO

British Standards Institute (2001)
*Design of Buildings and their Approaches*
*To meet the needs of Disabled People:*
*Code of Practice* (BS 8300)
Further Reading
Bright, K., & Flanagan, S. (2004). Buildings for all to use 2: improving the accessibility of public buildings and environments, CIRIA
Foster, J., (1997) Access to the Historic Environment, Donhead
Sensory Trust: Easy Access to Historic Landscapes: Sources of Information download from www.sensorytrust.org.uk

Access Audits
Access Plans: Helping your Application, Heritage Lottery Fund, 2004
BT Countryside for All Standards and Guidelines, Fieldfare Trust.

Contacts
Access Association
Walsall MBC
Civic Centre
Darwall Street
Walsall WS1 1TP
www.access-association.org.uk
01922 652010
Age Concern
Astral House
1268 London Road
London SW16 4ER
www.ageconcern.org.uk
020 8765 7200

The Adapt Trust
Wellpark
120 Sydney Street
Glasgow G31 1JF
www.adapttrust.co.uk
0141 556 2233
British Council of Disabled People
Litchurch Plaza
Litchurch Lane
Derby DE24 8AA
www.bcodp.org.uk
01332 295551

Centre for Accessible Environments
70 South Lambeth Road
London SW8 1RL
www.cae.org.uk
020 7840 0125
MENCAP
123 Golden Lane
London EC1Y ORT
www.mencap.com
020 7454 0454

Church Action on Disability
50 Scrutton Street
London EC2A 4XQ
www.charitiesdirect.com
020 7452 2085
National Register of Access Consultants
70 South Lambeth Road
London SW8 1RL
www.nrac.org.uk
020 7735
Disability Rights Commission
DRC Helpline
Freepost MID 02164
Stratford upon Avon CV37 9BR
www.drc.org.uk
08457 622633

Radar Access Advisory Committee
12 City Forum
250 City Road
London EC1V 8AF
www.radar.org.uk
020 7250 3222

DPTAC (Disabled Persons Transport Advisory Committee)
Zone 1/14
Great Minster House
76 Marsham Street
London SW1P 4DR

Royal National Institute for the Blind (RNIB)
105 Judd Street
London WC1H 9NE
www.rnib.org.uk
0845 766 9999

Help the Aged
207-221 Pentonville Road
London N1 9UZ
www.helptheaged.org.uk
020 7278 1114

Royal National Institute for Deaf People (RNID)
19-23 Featherstone Street
London EC1Y 8SL
www.rnid.org.uk
0808 808 0123

JMU Access Partnership
105 Judd Street
London WC1H 9NE
www.jmuaccess.org.uk
020 7391 2002

Scope
PO Box 833
Milton Keynes MK12 5NY
www.scope.org.uk
0808 800 3333

NATIONAL AMENITY SOCIETIES

Ancient Monuments Society
St Ann’s Vestry Hall
2 Church Entry
London EC4V 5HB
www.ancientmonumentssociety.org.uk
020 7236 3934

Society for the Protection of Ancient Buildings
37 Spital Square
London E1 6DY
www.spab.org.uk
020 7377 1644

Council for British Archaeology
Bowes Morrell House
111 Walmgate
York YO1 9WA
www.britarch.ac.uk
01904 671417

Twentieth Century Society
70 Cowcross Street
London EC1M 6EJ
www.c20society.org.uk
020 7250 3857

Garden History Society
70 Cowcross Street
London EC1M 6EJ
www.gardenhistorysociety.org
020 7608 2409

Victorian Society
1 Priory Gardens
Bedford Park
London W4 1TT
www.victorian-society.org.uk
1. Introduction
1.1 This statement is a summary of consultation undertaken by Wychavon District Council in respect of Draft Supplementary Planning Document 'Accessible Historic Environment'.
1.2 The content of this statement has had regard to the provision of the Town and Country Planning (Local Development)(England) Regulations, 2004.
1.3 The consultation period has ended; a report to the Development Control Committee provides details of representations received and proposed changes as a result of the consultation exercise.
1.4 The Council will then seek to adopt the SPD.

2. Background

2.1 A report to Committee on 8 December 2005 highlights the reasons for seeking to introduce the Draft SPD on Accessible Historic Environment. Specifically, the Draft SPD seeks to address concerns over the provision of access to services and buildings for people with disabilities as required under the Disability Discrimination Act 1995. Historic buildings and places should be accessible to everyone including the disabled, nevertheless, there is also a distinct need to conserve historic buildings and landscapes, and not to alter them in ways that adversely affect their architectural or historic interest.

2.1 The Draft SPD has had regard to the Sustainability Appraisal (Appendix 2) in the Wychavon District Local Plan to ensure that the new guidance contributes to sustainable development.

3. Consultation

3.1 The Consultation period began on 16 September 2005 and ended on 28 October 2005. The following documents are available for public consultation:-
• Draft SPD on Accessible Historic Environment
• Appendix I Statement of Consultation
• Appendix 2 Sustainability Appraisal

Availability of Documentation

3.2 The above documents are available for public inspection at the following locations:-
• Planning Reception Wychavon District Council, Civic Centre, Queen Elizabeth Drive, Pershore, 9.00 am - 5.00 pm Monday to Friday.
• All libraries in the District;
• The Council Website www.Wychavon.gov.uk

Persons Consulted

3.3 This Draft SPD has been forwarded to the following:
• Members of the District Council;
• Worcestershire County Council;
• All Parish Councils in the District;
• Local, County and National Amenity Groups

4. Publicity

4.1 Notice of the consultation period has been given by way of local advertisement in the Worcester News.

5. Further Information

5.1 A document detailing a complete list of all consultees, a copy of the advert, and response form will be available after the consultation period has expired. Copies will be available to view at Planning Reception at the Civic Centre or a copy can be requested using the contact details below:-

Heritage
Planning Services
Wychavon District Council
Civic Centre
Pershore

Tel - 01386 565323
Fax - 01386 561092
Email - Elaine.Artherton@wychavon.gov.uk
Website address - http//www.wychavon.gov.uk
SUPPLEMENTARY PLANNING DOCUMENT
ACCESSIBLE HISTORIC ENVIRONMENT

Appendix 3 - Sustainability Appraisal

6. Introduction

6.1 This statement is a summary of the Sustainability Appraisal undertaken by Wychavon District Council in respect of Draft Supplementary Planning Document Accessible Historic Environment.

6.2 The content of this statement has had regard to the provision of the Town and Country Planning (Local Development)(England) Regulations, 2004.

6.3 The Council will then seek to adopt the SPD.

7. Background

7.1 The Draft SPD has had regard to the Statement of Consultation (Appendix 2).

8. Sustainability Appraisal

3.1 Accessible Historic Environment SPD has regard to Policy ENV1, ENV12, ENV13, ENV15, ENV16 of the Wychavon District Local Plan (First Deposit) and Worcester County Structure Plan Policies CTC1 and CTC 19.

8.1 The Wychavon Local Plan Review (Supporting Document) Sustainability Appraisal Revised Deposit July 2003 considers the impact of individual policies, including ENV1, ENV12, ENV13, ENV15, ENV16, against a range of sustainability criteria. A Sustainability Matrix highlights the extent to which different Policies contribute to the different facets of
Impact of Policies on each of the sustainability criteria has been limited to their effect at a local level, rather than on a regional, national or global scale. Performance of policies over time will be evaluated against the sustainability criteria to ensure the Plan's sustainability objectives are being met and to indicate where a Policy may require further consideration.

8.2 The Matrix shows that Wychavon Policy ENV1, ENV12, ENV13, ENV15, ENV16 either moves towards sustainability or has insignificant impact.

9. Further Information

A copy of Wychavon District Local Plan Review Supporting Document Sustainability Appraisal, July 2003 is available to view at Wychavon Planning Services.

Tel - 01386 565323
Fax - 01386 561824
Email - Elaine.Artherton@wychavon.gov.uk
Website address - http://www.wychavon.gov.uk
The following table is a summary of the main issues raised during consultation.

G = General
R = Further Reading
A = Appendix

<table>
<thead>
<tr>
<th>Response</th>
<th>Name</th>
<th>Section</th>
<th>Comments</th>
<th>Officer Recommendation</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>The Cotswold Conservation Board</td>
<td></td>
<td>Well presented and thorough should provide helpful tool in balancing access for all and conservation of historic environment.</td>
<td>Noted</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>It is noted that policy framework does not include WDLP ENV12 (Cotswold ANOB policy). The Board wishes to see reference to this.</td>
<td>Disagree: The SPD addresses issues relating to the historic environment and the DDA raised in WDLP ENV15.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>The SPD could refer to the Cotswold AONB Management Plan including Policy TOP4 and actions TOA1 and TOA7.</td>
<td>Agreed: Where development proposals for disabled access in the Cotswold AONB involving listed buildings, settings and conservation areas, historic parks and gardens and designed landscapes, reference should also be made to the Cotswolds AONB Management Plan</td>
</tr>
<tr>
<td></td>
<td>2 Droitwich Spa Town Council</td>
<td>Welcomes document and has no objections.</td>
<td>Noted</td>
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<td>3</td>
<td>The ADAPT Trust</td>
<td>4.6 This should be expanded to include:</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td>• Turning spaces for wheelchairs must be a minimum of 1500mm diameter and fitments must not encroach on this space - this includes any baby changing facilities</td>
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<td></td>
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<tr>
<td></td>
<td></td>
<td>• Colour contrast is essential for visually impaired users i.e. walls, floors, grab rails should contrast in colour with sanitary ware</td>
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<td></td>
<td></td>
<td>• Alarms should be connected to a permanently staffed point where possible</td>
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<td></td>
<td></td>
<td></td>
<td>Agreed</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td>4.7 Visual: colour contrast will assist visually impaired people. Does not have to be extreme tonal contrasts are useful. Printed information should be in large print. Sound: provision for people with hearing loss should be considered e.g. induction loops at points where information is given and floor surfaces such as wood or carpet will distort/muffle sounds so alternative means of imparting information such as printed material will assist.</td>
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<td></td>
<td></td>
<td></td>
<td>Agreed</td>
<td></td>
</tr>
<tr>
<td></td>
<td>4 Ancient Monument</td>
<td>The text reads with authority and we have no objections.</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>Noted</td>
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<tr>
<td>Society</td>
<td>adverse observations to offer.</td>
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<tr>
<td>5</td>
<td>Research Group for Inclusive Environments</td>
<td>Preface</td>
<td>Refer to 'elderly' preferred term is normally 'older people'.</td>
<td>Agreed</td>
</tr>
<tr>
<td>1.2 DDA Act 1995 (Amendment) Regulations 2003 came into force which brings DDA in line with European Union Regulations where Part 2 of DDA has been extended to cover all employers.</td>
<td>Agreed: Replace 'every business employing more than 20 people' with 'all employers'.</td>
<td></td>
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</tr>
<tr>
<td>Suggest revised Code of Practice for the DDA 1995 Rights of Access: Services and Premises (Services to the Public, Public Authority Functions, Clubs and Premises) particularly relevant.</td>
<td>Disagree: Not relevant to this SPD</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6 Abbots Morton Parish Council</td>
<td>It is a good document but a sensible view must be taken in rural villages. It is important that sympathetic alterations are made with minimum impact where an historic building is involved.</td>
<td>Noted</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Open access to all is not practical. The safety aspect of greater use of technology should be considered.</td>
<td>Disagree: Access to the historic environment can be provided in a number of ways, some of which may involve technology. Safety aspects are a separate issue dealt with by other legislation.</td>
<td></td>
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<tr>
<td>Accountability for everyone is a good aim, however, a balance is needed in situations where implementing an idea would affect the architectural or historic interest.</td>
<td>Noted: The Accessible Historic Environment SPD has been written to inform development control decisions when this involves the historic environment and the DDA.</td>
<td></td>
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<tr>
<td>7 Society for the Protection</td>
<td>Very good, seems to provide sensible and useful advice.</td>
<td>Noted</td>
<td></td>
<td></td>
</tr>
<tr>
<td>of Ancient Buildings</td>
<td>4.1</td>
<td>There are a few places where the text says 'wheelchairs' rather than 'wheelchair users' which seems more polite.</td>
<td>Agreed</td>
<td></td>
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<td></td>
<td>Use of 'original' as in 'original features' a C18 door opening in C16 fabric is not original but may be significant. Unwise therefore to suggest that features may be altered as long as they are not 'original'.</td>
<td>Agreed: Insert 'not original and not significant' for clarity.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Another reference for bibliography Lisa Foster Access to the Historic Environment Donhead 1997</td>
<td>Agreed:</td>
<td></td>
</tr>
<tr>
<td>8 Mr Jardine Spetchley Estates</td>
<td></td>
<td>Is in support of the SPD and considers it a balanced draft.</td>
<td>Noted</td>
<td></td>
</tr>
<tr>
<td>9 White Ladies Aston Parish Meeting</td>
<td></td>
<td>This would appear to be an excellent document and tries to cover all points sympathetically from all angles.</td>
<td>Noted</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Main concern is that unrealistic demands could be made on the historic environment and it is hoped that common sense will prevail. Also concern that financial demands could be overwhelming.</td>
<td>Noted</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Could a small glossary be contained within the document.</td>
<td>Noted: Amend text for clarity</td>
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<tr>
<td></td>
<td></td>
<td>Would be grateful if a copy of draft consultation document could be sent to Spetchley Estate</td>
<td>Agreed: Copy sent to all Wychavon Registered Parks and Gardens</td>
<td></td>
</tr>
<tr>
<td>10 National Trust</td>
<td></td>
<td>The Trust very much welcomes the initiative of Wychavon District Council in producing this SPD and appreciates the</td>
<td>Noted</td>
<td></td>
</tr>
<tr>
<td>General approach pg 18</td>
<td>'Obtain any necessary consents' clearly needs to come before 'implement the access plan'.</td>
<td>Agreed</td>
<td></td>
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<td>------------------------</td>
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</tbody>
</table>
| General approach pg 18 | The SPD is hampered by lack of illustrations, the need for brevity and to address a variety of audiences. | • A collection of local photographs will be used to illustrate the adopted SPD.  
• The SPD is for the use of planners and conservation officers in the course of their work, the brief therefore was not brevity but thoroughness.  
• A general guidance note for the public will follow at a later date. |
| A good addition to the references in the SPD would be English Heritage Easy Access to Historic Buildings (2004) and Easy Access to Historic Landscapes (2005). | The English Heritage publication *Easy Access to Historic Buildings* is referred to in the references section. *Easy Access to Historic Landscapes* was not published at the time the SPD went out for public consultation. It will be added to the further reading list. |
| Many historic buildings are in private residential use, the advice could be relevant where owners are considering adaptation. | In the case of a listed dwelling the SPD is relevant to applications for listed building consent where this involves disabled access. |
| Preface | The fourth paragraph of the preface outlines the need for access to the historic environment. The primary service actively provided by the | Disagree: 'For the purposes of this SPD, and to fulfil the requirements of the DDA, 'access' means both 'to' and 'within' when disabled access affects the historic |
The majority of historic buildings and landscapes is not as heritage visitor attractions: the equality of access required both morally and under the DDA is not necessarily access to the historic environment but access within the historic environment. We feel that this is an important distinction and one that subtly changes the focus of the SPD.

<table>
<thead>
<tr>
<th>11</th>
<th>English Heritage</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Congratulates the Council on production of a thoughtful and well prepared statement. It should be of great assistance to applicants, members of the public, other professionals and members of the Council in interpreting and balancing the requirements of access and heritage legislation against the specific needs of individual historic sites and buildings.</td>
</tr>
<tr>
<td></td>
<td>Noted</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Preface</th>
<th>Suggest add 'The objectives of both sets of legislation may not always overlap'.</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1</td>
<td>Add 'and national policy guidance'.</td>
</tr>
<tr>
<td>1.3</td>
<td>Clarify if the Code is advisory or mandatory.</td>
</tr>
<tr>
<td></td>
<td>Define 'additive' and 'destructive' change and 'sympathetic reduction'. by example.</td>
</tr>
<tr>
<td></td>
<td>A collection of local photographs will be used for illustration purposes.</td>
</tr>
<tr>
<td></td>
<td>Clarify if the relocation of services is discriminatory if it applies to all users not just the disabled.</td>
</tr>
<tr>
<td></td>
<td>This is an optional way of providing the service for disabled people if all other options have proved</td>
</tr>
<tr>
<td>4.1</td>
<td>Should emphasise that door closers should be of a concealed type, and the siting of touch pads carefully considered in relation to their setting.</td>
</tr>
<tr>
<td>Suggest 'Door and Doorways'. Widening should only be considered after an appraisal of the age and sensitivity of the surrounding fabric has been made.</td>
<td>Agreed</td>
</tr>
<tr>
<td>Add 'historic integrity'.</td>
<td>Agreed</td>
</tr>
<tr>
<td>4.2</td>
<td>Principles advanced here seem to run counter to those set out at para 4.1</td>
</tr>
<tr>
<td>4.3</td>
<td>Wording in this paragraph is ambiguous and could beneficially be reconsidered.</td>
</tr>
<tr>
<td>4.4</td>
<td>The location of handrails should be carefully considered to make sure they do not damage historically sensitive or decorated surfaces including panelling and painted dadoes. Projection beyond the end of stair may not always be possible or desirable in sensitive historic locations. The advisory dimensions for a handrail may appear clumsy in some historic locations and may need to be modified to fit. Suggest adding a note</td>
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</tr>
<tr>
<td>4.6</td>
<td>Number of toilets should be clarified. More might be said about identifying suitable rooms for additional toilets.</td>
</tr>
<tr>
<td></td>
<td>Mention Building Regulations for minimum dimensions and potential for conflict.</td>
</tr>
<tr>
<td>5.1</td>
<td>Might frequency of 'passing bays' be dependent on the likely intensity of traffic?</td>
</tr>
<tr>
<td></td>
<td>Might 'unobstructed headroom' read better than 'tunnel'.</td>
</tr>
<tr>
<td>5.1</td>
<td>Discuss potential pedestrian-vehicle conflicts that might arise if car parking for disabled users is brought close to buildings in otherwise pedestrian areas?</td>
</tr>
<tr>
<td>Further Reading</td>
<td>Reference should be made to English Heritage <em>Easy Access to Historic Landscapes</em> published during the consultation period.</td>
</tr>
</tbody>
</table>