

## **RNIB Cymru response to Consultation into the General Principles of the Planning (Wales) Bill 6 November 2014**

### **1. About RNIB Cymru**

1.1. RNIB Cymru is Wales' largest sight loss charity. We provide support, advice and information to people living with sight loss across Wales, as well as campaigning for improvements to services and raising awareness of the issues facing blind and partially sighted people. RNIB Cymru welcomes the opportunity to respond to this inquiry. We also support Guide Dogs Cymru's response to the inquiry.

### **2. Unintended consequences of the Bill**

2.1. The proposed removal of the mandatory requirement for Design and Access Statements risks serious unintended consequences. We would like to draw the Committee's attention to RNIB Cymru and Guide Dogs Cymru's responses to the Positive Planning consultation in which we opposed removing the mandatory requirement for Design and Access Statements.

2.2. The built environment has a massive impact on the independence of the 100,000 blind and partially sighted people living in Wales. The accessibility of buildings and their surroundings can be a crucial factor in determining whether blind and partially sighted people are able to live independent and active lives within their local area.

2.3. Design and Access Statements encourage designers and architects to show how they have taken a broadly inclusive approach. We are concerned that if the requirement is removed, compliance will diminish to meet the basic minimum required to allow for physical access – for example, ramps, wider doors and lifts- and neglect consideration of factors such as colour contrast,

tactile surfaces, appropriate warning for steps and flights of stairs, good lighting and helpful location of reception areas.

2.4. The review of Design and Access Statements in Wales identified that despite the emphasis on inclusive design in policy and guidance in Wales, access and equality considerations do not always feature strongly in the design of developments. RNIB Cymru is concerned that unless there are mandatory requirements to consider access issues, questions of accessibility will be neglected in many developments, with consequent adverse impact on blind and partially sighted people.

2.5. RNIB Cymru are also concerned that blind and partially sighted people are often disenfranchised from consultation around changes to the built environment. Typically, consultation relies on printed information, including technical plans and maps, which are not made available in formats that are accessible to someone with sight loss. We are aware of a number of developments that have failed to take into account the needs of blind and partially sighted people – the result of which in some cases is costly retrofitting, such as at Aberystwyth bus station. We are concerned that the removal of the mandatory requirement for Design and Access Statements could compound this situation.

2.6. We are aware that the Welsh Government's current consultation 'Design in the Planning Process' seeks views on how to facilitate the delivery of good and inclusive design through the planning system through alternative measures. We welcome the opportunity to contribute to further discussion of this issue.

2.7. We accept that Design and Access Statements are not the only means of achieving inclusive design, and that in their current form are not always effective in achieving this. However we remain very concerned that removing a mandatory requirement for Design and Access Statements sends a message to developers that inclusive design is no longer important.

2.8. We would suggest that the Welsh Government should focus on finding effective ways to ensure that Design and Access Statements achieve what they were intended to do, rather than

removing the mandatory requirement. It is vital that inclusive design is considered at the design/planning stage before construction is underway. Making alterations at a later stage is both costly, and may limit the options available to ensure accessibility.

### **3. Further information**

3.1. For further information, please contact Tess Saunders, Policy and Campaigns Officer: [tess.saunders@rnib.org.uk](mailto:tess.saunders@rnib.org.uk); 029 2082 8564.