IMPROVING ACCESS to Listed Buildings in the City of London
Introduction

The Corporation supports and requires access to the built environment, where this can be achieved in a manner which is inclusive to all. Special care needs to be taken in the case of listed buildings to provide an inclusive approach to accessibility. The unique architectural heritage of listed buildings is an intrinsic part of the character of the City of London. The Corporation of London recognises the historic and cultural importance of these buildings, which are an irreplaceable resource. Some listed buildings are, by their design, inaccessible to some disabled people.

The Department of Planning and Transportation and the Department of Community Services recognise that buildings are individual and that any alterations need to be specific to a building and its use. The solution for one building may be unacceptable for another building and a range of alternatives will need to be considered, including how the building is used and ways to minimise alterations. In a few cases, inclusive access may be limited and building management will be crucial to the successful use of the building. However, even minor alterations can sometimes make a significant improvement.

This Planning Advice Note illustrates some of the issues that concern owners, developers and architects when considering access and access alterations to listed buildings. Expectations of what can be achieved change constantly and improvements are always sought. Information on relevant legislation, policies and guidance is included. Case studies highlight examples of what has been achieved to reconcile listed building considerations and access. The Advice Note includes a suggested plan of action for consideration of alterations to listed buildings.

St. Giles Cripplegate, Barbican Estate
Steps extended and ramp built

Cover: St Laurence Jewry
External paving raised and step removed at west entrance
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Listed Buildings and Access
Legislation, Policy, and Other Advice

Department of the Environment/Department of National Heritage: Planning and the Historic Environment (PPG 15) states: “It is important, in principle, that disabled people should have dignified easy access to and within historic buildings. It should normally be possible to plan suitable access for disabled people without compromising a building’s special interest.” (paragraph 3.28)

The London Plan: Spatial Development Strategy for Greater London 2004 states that The Mayor will require all future development to meet the highest standards of accessibility and inclusion. Unitary Development Plans should integrate and adopt the principles of inclusive design. It also states that Boroughs should encourage and facilitate inclusive solutions to providing access to all, to and within the historic environment. The Mayor is producing Supplementary Planning Guidance, Accessible London www.london.gov.uk/mayor/strategies/sds/accessible_london

City of London Unitary Development Plan (UDP) 2002
Policy STRAT 10E “To require accessibility throughout the City for everyone unless it can be demonstrated to the Corporation’s satisfaction that there are justifiable reasons for not doing so.”

Policy ENV 12 “Development in conservation areas will be permitted only if it preserves or enhances the special architectural or historic character or appearance of the conservation area.”

Policy ENV 16 “To grant consent for the alteration of the exterior or interior of a listed building only where this would not detract from its special architectural or historic interest.”

Policy ENV 27 “To require access to the built environment for everyone including the provision of facilities and amenities for disabled people.”

The UDP also states “as the City changes through the upgrading and refurbishment of buildings, opportunities arise to ensure that the City’s environment caters for everyone’s needs, including disabled people.”

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Guildhall Ambulatory
Lift access to crypt

Guildhall Crypt
Access lift
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English Heritage: Easy Access to Historic Properties 1995 (under revision)

A guidance note to help those concerned with improving access to historic properties to strike a balance between conservation and access requirements, states: “English Heritage seeks to ensure that its programmes and activities are accessible to everyone, wherever practicable. It will also encourage others who own or manage historic buildings to adopt access plans which are consistent with the special architectural, historic, or archaeological character of the property concerned.”


The guide provides guidance, information and examples of good practice to all those involved in the development and planning process. A series of good practice points are suggested to help achieve an inclusive environment to the benefit of all.

The Disability Discrimination Act (DDA) 1995 has made it unlawful to discriminate against disabled people and gives them rights in the areas of employment, access to goods, facilities and services, and buying or renting land or property. From 1st October 2004, there is a duty to overcome physical barriers in a building which make it impossible or unreasonably difficult for a disabled person to use the service.


In recognising that service providers hold the key to promoting an environment which is accessible to all, this Code offers practical guidance on making ‘reasonable adjustments’ specifically for disabled people.


Article 14 Prohibition of Discrimination states: “In the application of Convention Rights, you have the right not to be treated differently because of your race, religion, sex, political views or any other status (this includes disability), unless this can be justified objectively.”
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Planning and Access for Disabled People, A Good Practice Guide.
Office of the Deputy Prime Minister 2003
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The Revised European Social Charter in Article 15, paragraph 3 states:

"regarding the right of persons with disabilities to independence, social integration and participation in the life of the community, in particular through measures aiming to overcome barriers to communication and mobility and enabling access to transport, housing, cultural activities and leisure."


"States should recognise the overall importance of accessibility in the process of the equalisation of opportunities in all spheres of society. For persons with disabilities of any kind, States should introduce programmes of action to make the physical environment accessible."

Bishopsgate Police Station
Access lift

Wood Street Police Station
Ramp & handrails
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United Nations Standard Rules on the Equalisation of Opportunities for Persons with Disabilities 1993. Rule 5. Accessibility “States should recognise the overall importance of accessibility in the process of the equalisation of opportunities in all spheres of society. For persons with disabilities of any kind, States should introduce programmes of action to make the physical environment accessible.”
Access Standards and Guidance

Designing an Accessible City, Corporation of London 1998.
www.cityoflondon.gov.uk (under revision)

BS 8300:2001 Design of buildings and their approaches to meet the needs of disabled people Code of Practice.


Access to the Historic Environment - Meeting the needs of disabled people 1997 Lisa Foster, Donhead Publishing.

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Action Plan

The following stages are recommended to develop an access action plan if the building is not accessible to all.

1. Is the building listed, in a conservation area, or a scheduled ancient monument? If so, discuss what consents may be applicable with the Department of Planning and Transportation.

2. Carry out an Access Audit of the building and site in order to identify access requirements.
   a) Establish what activities take place in the building
   b) Who uses the building? Include potential employees and building users
   c) Can access be provided in a dignified and appropriate way that avoids alterations to the building, and that is compatible with the building design, for example;
      - can an alternative route to and within the building be used?
      - can organisational changes be made, for example, can services be relocated to an accessible area of the building?
      - are the proposals well designed and sympathetic to the special character of the building

3. Consult with disabled users, the Access Team and the City of London Access Group to decide priorities and accessibility design standards. Consult with the Department of Planning and Transportation on the proposed alterations and need for consents.

4. Prepare an Access Statement to submit with any planning, listed building or conservation area consent application.

5. Obtain any necessary consents.

6. Prepare a programme and timetable for implementation of the scheme.

7. Carry out regular reviews of the building to ensure that the original aims are being met.

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Staple Inn
Ramp and handrails
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Contacts

Early consultation with the Department of Planning and Transportation and the Department of Community Services is advised, and specific advice can be obtained from:

**Department of Planning and Transportation**
Planning Enquiries
020 7332 1710
plans@corporoflondon.gov.uk/plans
www.cityoflondon.gov.uk/plans

**Department of Community Services**
Head of Access Team
020 7332 1995
020 7332 3929 (text phone)
Access@corporoflondon.gov.uk
www.cityoflondon.gov.uk/access

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This publication can be made available, upon request, in other languages, large print, Braille and on tape. Please contact the Planning and Transportation Enquiries Office on 020 7332 1710

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