



**Spinal Injuries Association (SIA) 's response to the
British Standards Institution's revised Code of Practice (BS8300):
Design of buildings and their approaches to meet the needs of disabled people**

Foreword - Presentational convention

Comment: The document should be easier to read in an accessible format.

Proposed Change: To a sans serif font such as Arial in a 12 point format.

4.1 Car parking, setting-down and picking-up points, and garaging

Comment: There should be implicit mention throughout this section of the requirement of many disabled people to open their door fully to enter or exit their vehicle, just as there is reference to the need for transfer hoists. It is important to also remember people of small stature and those with restricted limbs and restricted limb movement who have difficulty in operating some of the current car parking systems.

Proposed Change: The driver of a vehicle (alone or accompanied) or a passenger might be disabled and might need to enter or leave the vehicle using a transfer hoist that is usually semi-permanently attached to the vehicle. Add "The door of the vehicle will often need to be opened fully to enable the disabled person to alight or exit their vehicle. Alternatively, it might be necessary ..."
Automated systems should be accessible to all disabilities, most importantly the assistance request procedure.

4.1.1 On-street Parking Bays

Comment: Parking bays should be wide enough to allow both passenger and driver to alight from the vehicle in the bay. Bays are often designed only for alighting from one side, especially in one way systems. This is a health and safety concern for disabled people who may be both passenger and driver.

Proposed Change: Parking bays to be of a suitable width to allow both driver and passenger to alight safely from the vehicle within the bay.

4.1.2.1 General provision

Comment: Agree with previous comments. In some cases designated parking even nearest to the building is difficult for some disabled people to access

without discomfort and the emphasis of this section must be on enabling the disabled person to park as close to the premises as possible. The requirement to park close to a building should also supersede the danger of falling debris, and as stated in comment 5 good planning should be able to incorporate the needs of fire and rescue services as well as those of disabled people.

Proposed Change: To delete "Designated parking spaces should be located sufficiently far from the premises to minimize interference with the fire and rescue service or danger from falling debris."

4.1.2.4 Railway car parks

Comment: It is common for accessible bays to be provided in short stay car parks, but less common in long stay. There is no reason to assume that disabled people require long stay provision any less than other people, especially given the remarks under comment 5.

Proposed Change: Keep recommendation: "For railway car parks, the minimum number of designated spaces in both long stay and short stay should be one space for each employee who is a disabled motorist, plus 5% of the total capacity for visiting disabled motorists."

4.1.3.2 Design and layout of designated off-street parking spaces

Comment: There should be implicit mention of the requirement of many disabled people to open their door fully to enter or exit their vehicle.

Proposed Change: Add to recommendation: "to enable a disabled driver or passenger to open their door fully and get in or out of a vehicle"

4.1.5.2 Pay - and - display systems

Comment: In the event that parking is not free to blue badge holders the shortest route to pay and display machines from designated parking bays should be free of obstructions such as kerbs and excessive gradients.

Proposed Change: The pre-payment machine (e.g. a ticket dispenser) should be positioned close to the designated parking space or spaces on a route that is clear of obstructions such as kerbs and excessive gradients.

5 Access routes to and around buildings

Comment: Camber of the area plays an important part in the ability of a wheelchair user to be able to propel themselves without undue difficulty and discomfort. This is just as important as loose materials. In some instances you can feel as if you are heading for the curb and road beyond. Also the type of surface that is used is important for instance split York stone is very uncomfortable and has a jarring affect which is particularly painful for spinal injuries and arthritic wheelchair users.

Proposed Change : Walkway cambers should be at a minimum to avoid difficulties for wheelchair users, those who use walking aids and mothers with pushchairs.

5.5 Footway and footpath surfaces

Comment: All footpaths should be kept in good repair and free from flagstone unevenness, flagstones becoming loose and poor repair finish when services have disrupted the surface area.

Proposed Change: All footways and footpaths must be kept clear of all debris and any lichen etc, and monitored for safety, ensuring any repairs are carried out to return the surface to its original quality.

6 Entering a building

6.1.1 General

Comment: It is important to also remember people of small stature and those with restricted limbs and restricted limb movement. These are often people who have difficulty accessing buildings. Any control systems need to take this into consideration.

Proposed Change: Entrance doors should be able to be operated with minimum effort

8.1.6 Refuges

Comment: If there is a fire alarm going off there needs to be ear protection available in the refuge as well as an ability to communicate with the person in charge of any evacuation. In addition ear protection should be available for any disabled person using the refuge in the event of an alarm being sounded. These should be located a suitable height as to be accessible to people with limited limb movement, wheelchair users and people of small stature.

Proposed Change: Provision of ear protection in the refuge accessible to people with limited limb movement, wheelchair users and people of small stature

11 Assembly areas

Comment: Access to reception desks in opticians and pharmacies should be included.

Proposed Change: Add to third paragraph after surgeries, "opticians and pharmacies,"

11.1.10 Communication

Comment: Other hearing aid users may be able to pick up the same signal. Where there is an issue of confidentiality (e.g. Banks, doctor's surgeries etc.) an alternative area should be provided. Manned information and enquiry points are a vital link for some people especially those with visual impairments. Adequate and appropriate signage to such a point is essential. People may want information only such as which stand or platform.

Proposed Change: Hearing loops should only be installed where confidentiality can be maintained or is not an issue. Alternative should be provided if confidentiality is an issue. Signage to information and enquiry points should meet with current standards and at least one such point should be manned.

12.5.9 Emergency assistance

Comment: There should be implicit mention of the fact that an alarm cord will have to be used by people seated or lying on the floor, as often alarm cords are tied to grab rails to keep them out of the way. Whilst this would be a building management issue, reference in this document would still be worthwhile.

Proposed Change: An emergency assistance pull cord should be sited so that it can be operated from the WC and by a user seated or lying on an adjacent floor area.

12.6 Changing Places facilities

Comment: In newly designed 'larger buildings' it should be easy to plan in a Changing Places area. These spaces may be used by a small number of people but are necessary to enable such people to leave their houses in comfort and confidence and to lead the independent lives that BS8300 is seeking to achieve.

Proposed Change: Support the inclusion of this section in the new British Standard.

12.7.1 Provision of accessible bedrooms

Comment: There should be some reference to different lay out of rooms – for example, single, double and twin. More often than not accessible rooms use a double bed, but provision of twin bedrooms with accessible toilets should also be considered at the design stage, as per figure 60.

Proposed Change: That the comments above are noted and reference is made to a disabled person's equal need to a variety of room lay out.

The Spinal Injuries Association (SIA) has over 5000 members and represents the interests of approximately 40,000 people in the U.K. with Spinal Cord injury. Views were obtained by publishing proposals in our magazine and website; seeking comment from our membership. SIA's Governing Council members with expertise in access issues were also involved.

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