

Design in the Planning Process

Consultation Response

January 2015



About Us

The National Deaf Children's Society (NDCS) Cymru is the national charity dedicated to creating a world without barriers for deaf children and young people.

We support and represent the interests of deaf children and young people from birth through to independence. In referring to "deaf" we refer to all levels of hearing loss, including mild, moderate, severe, profound and temporary hearing loss.

Background

NDCS Cymru welcomes the opportunity to respond to this consultation. Indeed, we have concerns that the planning process is not effective in ensuring that school, college and nursery buildings are accessible to deaf learners.

Following the devolution of building regulations, we launched our *Sounds Good* campaign at the end of 2011. The campaign called for more robust acoustic regulations for school, college and nursery buildings in Wales.

Poor acoustics in school buildings present access issues for all pupils, but particularly for children with additional learning needs, including autism, speech and language difficulties, visual impairment and deafness. Indeed, many deaf children and young people have an oral approach to learning and require a good listening environment in order to utilise their access to sound. While many deaf pupils use assistive listening equipment, such as hearing aids or radio aids, these devices do not restore typical hearing levels and a good acoustic environment is required for these devices to be effective. Welsh Government statistics demonstrate that deaf pupils in Wales are underachieving at every Key Stage and, as deaf young people have themselves identified,¹ poor acoustics is a key barrier preventing them from reaching their full potential.

Although school buildings are required to meet a minimum acoustic standard, our campaign report highlighted a lack of confidence that this is being achieved. It

¹ NDCS Cymru worked with deaf children and young people to create a video talking about the key barriers they face at school. The young people identified poor acoustics as one key barrier. For more information and to watch the video, please visit http://www.ndcs.org.uk/about_us/campaign_with_us/wales/close_the_gap/index.html.

highlighted that most school building projects in Wales were neither tested for compliance with these standards nor involved any consultation with an acoustic specialist. The report identified the following concerns:

- That it is relatively easy to opt out of meeting acoustic standards and, in practice, acoustic standards can be dropped without thorough consideration.
- That the importance of meeting acoustic standards in school buildings was being undermined as there was no compulsory requirement to test for compliance with acoustic standards.
- That legal standards on acoustics do not apply to all nursery and further education buildings.

NDCS Cymru is pleased that the Welsh Government has acknowledged the importance of improving compliance with acoustic standards through making specific contractual demands of projects funded through its 21st Century Schools Programme. However, NDCS Cymru considers that the Welsh Government could utilise this opportunity to take this commitment further; NDCS Cymru wishes to ensure that all school, college and nursery buildings sound good, regardless of how they are funded.

For more information on our Sounds Good campaign, please visit

http://www.ndcs.org.uk/about_us/campaign_with_us/wales/sounds_good/index.html

The need to improve acoustics in school buildings was also identified by deaf children and young people themselves through our Close the Gap petition presented to the National Assembly for Wales' Petitions Committee in May 2013. The Petitions Committee is presently taking evidence on acoustics in school and will write a report on the issue in due course. For more information on this petition and to see what the young people said on their petition video, please visit:

http://www.ndcs.org.uk/about_us/campaign_with_us/wales/close_the_gap/index.html

Response

1. Is the planning system effectively delivering the five key objectives of Good design?

NDCS Cymru is concerned that the key objective “ensuring ease of access for all” is often not achieved for the deaf population through the current planning process. The current position is that good design for the hearing impaired is not common, therefore separate access provision is required as the norm.

As outlined above, we have identified particular issues in relation to meeting acoustic standards in school buildings through our *Sounds Good* campaign and would urge

the Welsh Government to improve building regulations to this end. In particular, we would suggest that:

- Compulsory pre-completion testing for compliance with acoustic standards is required and that buildings which fail receive remedial action to bring them up to standard.
- That the acoustic standards are extended to cover all nursery and further education buildings as well as schools.
- At present, it is relatively easy to opt out of meeting acoustic standards and, in practice standards can be dropped without thorough consideration. We would like the regulations to be tightened to prevent this from happening.

2. Do you agree that a national development management policy on design would be beneficial?

We are of the view that a national development management policy on design would be beneficial only if it could adequately provide provision for equal access to deaf children and people with a hearing impairment.

6. Other than further training or additional practice guidance what additional tools would assist you in assessing the quality of design in planning proposals?

The National Deaf Children's Society has recently produced a series of resources that set out the simple steps that can be taken to improve the listening environment in schools, nurseries and other education settings.² Improving listening environments will benefit not only deaf children but other children with additional learning needs. Teachers and support staff will also benefit from an improved listening environment. The resources are tailored for different audiences, including property managers, commissioners, local authorities and other professionals.

NDCS has also developed three quality marks as part of a self-accreditation scheme to help schools demonstrate that their classrooms provide a good listening environment for pupils. The Quality Marks can only be used if an acoustic test has been carried out by a competent person such as a member of the Institute of Acoustics (IOA) (www.ioa.org.uk) or whose company is a member of the Association of Noise Consultants (www.association-of-noise-consultants.co.uk)

7. Do you agree that the amendments to the 1APP form will ensure inclusive access issues are considered in development proposals?

² The free resources are available here: www.ndcs.org.uk/acoustics

No, we do not agree. In our experience deaf children and hearing impaired people are NOT properly considered as part of the inclusive design process. They routinely have to struggle with unsuitable spaces and therefore need some additional assistance from DAS. If the DAS are removed there would, in all probability, be no provision for the hearing impaired, leading to less inclusion.

8. What information or other measure would assist local planning authorities assess planning proposals in terms of inclusive access?

An inclusive design assessment would be of assistance to test whether proper consideration has been given to the needs of deaf children and the hearing impaired. If it has not, then an access statement should continue to be required. This is the opposite of what is being proposed.

9. How can PAIS and DCfW mainstream good design and inclusive access in the planning process?

PAIS and DCfW should make sure that good acoustic design standards are considered and delivered as part of Inclusive Access Designs, and that suitable specialists have tested to check that the design has been implemented.

Architect Julian Treasure presented a TED talk in 2012 on why architects and designers need to “use their ears” and pay attention to the invisible architecture of sound. We would recommend that PAIS and DCfW use this talk in any training or resources relating to good design and inclusive access. The talk is available here: <https://www.youtube.com/watch?v=y5nbWUOc9tY>

10. How can we continue to raise the design skills of local authority officers and members and what further specific training is required?

In 2011, NDCS Cymru issued Freedom of Information Requests to all 22 local authorities to establish how acoustic standards were being applied on the ground. As identified in our *Sounds Good*³ campaign report, the feedback we received suggested that officers were confused about the status of minimum acoustic standards.

NDCS Cymru recommends that local authority officers and members receive training in acoustic standards. It would also be beneficial to include information on why good acoustics are so important for vulnerable groups of learners, particularly deaf pupils. Our sound simulation demonstrates what it is like to be a deaf pupil in a classroom with poor acoustics. To listen to this simulation, please visit http://www.ndcs.org.uk/family_support/audiology/hearing_loss_simulation/index.html.

We would also recommend the TED Talk by Julian Treasure mentioned above in question 9 as an essential element of training in acoustic standards.

³ *Sounds Good* Campaign report (2011), available at http://www.ndcs.org.uk/about_us/campaign_with_us/wales/sounds_good/index.html

As mentioned previously, NDCS has recently published a new resource pack for schools, local authorities and parents on how to achieve good listening conditions in learning environments. We would welcome the opportunity to work with the Welsh Government and local authorities to ensure that this pack is utilised throughout Wales.

12. Can you highlight areas of good practice, from Wales or elsewhere, relating to any of the above, which promote and/or lead to the achievement of good design and inclusive access?

NDCS Cymru contributed to a case study on Rogiet Primary School, Monmouthshire, which was built as part of the 21st Century Schools programme. NDCS Cymru was asked for advice on the importance of ensuring a good acoustic environment in the school.

The school site is located near the M4, M48, and a railway, but good acoustic design has ensured that these outside noises are not able to distract pupils inside the school building. Careful consideration has also been given to the interior of the school, so that noise from corridors and neighbouring classrooms does not carry through to other areas of the school. As a result, pupils are not distracted by background noise and teachers do not have to strain their voices to be heard. While the good acoustics are beneficial to everyone within the school, the quiet environment has also made the school more inclusive of pupils with a hearing loss.

In order to achieve a good acoustic environment, acousticians were consulted from the design phase of the project and, following completion of the project, acoustic testing ensured compliance with the acoustic standards outlined within Building Bulletin 93.

The acoustic standard at Rogiet Primary was achieved as a result of carefully considering the acoustics from the design phase throughout the project. At the start of the project, a noise survey was conducted onsite and consideration was given to the positioning of the school building in order to minimise the impact of noise from the nearby train line and roads.

Acousticians worked closely with the architects throughout the project and a number of measures were taken to secure a good acoustic environment. For example, careful consideration of cross ventilation and a BMS system controlling window openings was used to meet the ventilation requirements of BB101 without the need for wide window openings, helping to ensure that children within the school building are not disrupted by outside noise.

Acoustically rated, solid core doors were also utilised with acoustic seals on all four sides, in order to help ensure that noise does not travel between rooms.

Following completion of the project, acoustic testing ensured compliance with the acoustic standards outlined within Building Bulletin 93.

More details of the project can be found on the 21st Century Schools website where Rogiet Primary School is used as an exemplar of inclusive access in achieving good acoustic standards.⁴

14. Should the mandatory requirement for Design and Access Statements be removed from secondary legislation? Give reasons for your answer.

No. If DAS were removed from secondary legislation there would be no way to check whether any provision has been made for deaf children and hearing impaired people. This could be open to legal challenge and could be deemed to be unlawful under the Equalities Act 2010.

15. We have asked a number of specific questions. If you have any related issues or ways which design can be improved through the planning system which we have not specifically addressed, please let us know.

Acoustics is of critical importance to inclusive design and for access by those with hearing impairment. Much more could be done to require good standards of internal acoustics from the planning stages in all types of buildings. There is not one raft of guidance, as there now is for school acoustics, but it would be beneficial to create such guidance. Assistance can be provided by the Institute of Acoustics in preparing a guide to inclusive acoustic design for Wales.

For More Information

For more information on the points raised in this consultation, please contact Wales.Campaigns@ndcs.org.uk.

Many thanks.

⁴ <http://21stcenturyschools.org/projects/south-wales/rogietprimaryschool/?lang=en>

Design in the Planning Process (Consultation)

Date: 6 October 2014 - 16 January 2015

Name	Debbie Thomas & Elin Wyn	
Organisation	National Deaf Children's Society Cymru	
Address	2 Ty Nant Court, Morganstown, Cardiff CF15 8LW	
E-mail address	Wales.campaigns@ndcs.org.uk	
Telephone	02920 373474	
Type <i>(please select one from the following)</i>	Business	<input type="checkbox"/>
	Local Planning Authority	<input type="checkbox"/>
	Government Agency / Other Public Sector	<input type="checkbox"/>
	Professional Body / Interest Group	<input type="checkbox"/>
	Voluntary sector (community groups, volunteers, self-help groups, co-operatives, enterprises, religious, not for profit organisations)	<input checked="" type="checkbox"/>
	Other (other groups not listed above)	<input type="checkbox"/>