

# Managing easy access to listed buildings in Wales



Cover: Enhancing access was an important guiding principle in an ambitious conservation project at Llancaiach Fawr. The addition of an entirely new staircase tower with a platform lift ensures that, for the first time in its long history, there is now easy access to the upper floors of this magnificent grade I listed building.  
© Crown copyright (2022), Cadw, Welsh Government

# Contents

<b>Statement of Purpose</b>	<b>04</b>	<b>4. Making Access a Reality</b>	<b>32</b>
<b>Fast Facts</b>	<b>06</b>	4.1 Practical Advice and Examples	
<b>Introduction</b>	<b>07</b>	4.2 General Considerations	
<b>1. Why Access Matters</b>	<b>09</b>	4.3 Horizontal Movement	
1.1 Conservation Principles		4.3.1 Making an Entrance	
1.2 Well-being of Future Generations		4.3.2 Doors and Openings	
1.3 Equality		4.3.3 Thresholds	
1.3.1 The Public Sector Equality Duty		4.3.4 Floors	
1.3.2 Employers		4.3.5 Corridors	
1.3.3 Service Providers		4.3.6 Visual Contrast	
1.3.4 Volunteers			
1.3.5 Educational Institutions		4.4 Vertical Movement	
<b>2. The Regulatory Framework</b>	<b>15</b>	4.4.1 Ramps	
2.1 Planning Permission		4.4.2 Stairs and Landings	
2.2 The Building Regulations 2010: Approved Document M for Use in Wales		4.4.3 Handrails	
2.3 Listed Building Consent		4.4.4 Lifts	
2.4 Ecclesiastical Exemption		4.4.5 Emergency Escape	
2.5 Scheduled Monument Consent		4.5 Lighting, Signs and Information	
2.6 Historic Parks and Gardens		4.5.1 Lighting	
<b>3. Planning Better Access</b>	<b>21</b>	4.5.2 Signs	
3.1 What is Reasonable?		4.5.3 Information	
3.1.1 The Access Strategy and Plan		4.6 Landscape and Settings	
3.1.2 The Access Audit		4.7 Street Furniture and Seating	
3.1.3 The Assessment of Significance			
3.1.4 The Access Plan		<b>Further Information</b>	<b>53</b>
3.1.5 Management Issues			
3.1.6 Funding for Access Improvements		<b>Contacts</b>	<b>55</b>
3.2 Barriers to Access			
3.2.1 Overcoming Barriers			
3.2.2 Removing the Feature			
3.2.3 Altering the Feature			
3.2.4 Finding Ways Around Barriers to Access			
3.2.5 Providing the Service in Another Way			

# Statement of Purpose

*Managing Easy Access to Listed Buildings in Wales* explains how to plan and improve physical access to listed buildings in Wales. It uses real-life examples, ranging from minor improvement works to high-quality modern design solutions, to show how better access can be achieved.

It also explains how improvements in access can take account of Cadw's *Conservation Principles for the Sustainable Management of the Historic Environment in Wales*<sup>1</sup> and summarises the regulatory framework that governs changes to listed buildings.

*Managing Easy Access to Listed Buildings in Wales* is intended to help all those who own, manage or occupy listed buildings in Wales. It should also assist those who plan alterations or advise on alternative forms of service provision. It is especially relevant for those listed buildings that offer services to members of the public, such as catering, banking or shopping, or which people visit for leisure, work, worship or education purposes.

Although *Managing Easy Access to Listed Buildings in Wales* applies specifically to listed buildings, the approaches described here are applicable to any historic building in Wales.

*Approved Document M of the Building Regulations for Wales*<sup>2</sup> and BS 8300 *Design of an Accessible and Inclusive Built Environment*<sup>3</sup> should be consulted for advice and guidance about broader policies, practices and procedures relating to access. They also contain general design guidance. Additional advice about design is available in *Technical Advice Note 12: Design*<sup>4</sup> and from the Design Commission for Wales in *Inclusive Design in the Built Environment: Who Do we Design For?*<sup>5</sup>

Decision-making authorities should also use this guidance alongside *Planning Policy Wales*,<sup>6</sup> *Technical Advice Note 24: The Historic Environment*<sup>7</sup> and *Conservation Principles* to inform their own policies and when considering individual applications for planning permission and listed building consent, including pre-application discussions.

### **Acknowledgement**

Cadw is grateful to Historic England for permission to base the text of this best-practice guidance on *Easy Access to Historic Buildings*,<sup>8</sup> published in 2015.



# Fast Facts

---

- Good-quality access to listed buildings can enhance understanding and appreciation of the historic environment.
- Sensitive alteration to improve access need not harm a listed building's special architectural or historic interest.
- The local planning authority, Cadw and local access groups can provide valuable advice before you apply for any consents to improve access.
- Access audits, strategies and plans can help balance the needs of people with those of listed buildings.
- Access statements are good practice and must accompany some heritage impact statements for listed building consent.
- Design and access statements are required for some applications for planning permission.
- BS 8300 *Design of an Accessible and Inclusive Built Environment, Approved Document M of the Building Regulations for Wales* and *Inclusive Design in the Built Environment: Who Do we Design For?* are good sources of guidance.

---

## Old Library, Cardiff

Keeping our listed buildings in use and accessible is a key to effective protection. Cardiff's Old Library now houses the Museum of Cardiff and commercial premises. A podium incorporating a ramp with handrails added to one of the building's principal facades provides access for all to this major public building in the heart of the city.

© Crown copyright (2022), Cadw, Welsh Government



# Introduction

---

The historic environment is a vital part of our shared cultural heritage. It shapes our sense of place and contributes to our well-being and quality of life. Listed buildings play an important role in the Welsh historic environment. They are often focal points in towns and communities, making significant economic, social and cultural contributions as visitor attractions, businesses, community centres, education and leisure facilities, and homes.

This means that listed buildings should be accessible to everyone and whilst the needs of disabled people must be a priority, easier access will benefit almost all of us at some stage in our lives. Thoughtful and effective design is valuable to everyone.

Cadw is keen to promote access solutions that combine conservation with excellent and innovative modern design. With the right kind of thought and discussion, a way can be found around almost any barrier, especially as the technical opportunities to meet them — as well as people's expectations — are constantly evolving. *Managing Easy Access to Listed Buildings in Wales* shows how this vision can be turned into practical reality.

This guidance is structured in four parts. Sections 1 and 2 provide an overview of why access matters and the statutory framework which governs changes to listed buildings. Section 3 looks at planning better access, including strategies, audits, conservation assessments and access plans. The final part, section 4, looks in more detail at how to put access plans into practice using real-life examples which show how easy access to listed buildings can be achieved.

Cadw hopes that *Managing Easy Access to Listed Buildings in Wales* will promote good-quality solutions that make access easier while at the same time encouraging responsible care of the historic buildings that matter to us all.

The policy of the Equality Act 2010 is not a minimalist policy of simply ensuring that some access is available to disabled people; it is, so far as is reasonably practicable, to approximate the access enjoyed by disabled people to that enjoyed by the rest of the public. The purpose of the duty to make reasonable adjustments is to provide access to a service as close as it is reasonably possible to get to the standard normally offered to the public at large (and their equivalents in relation to associations or the exercise of public functions).

*Equality Act 2010 Services, Public Functions and Associations: Statutory Code of Practice, 2011.*<sup>9</sup>

## Esplanade Hotel, Llandudno

Good design is an important element in successful access solutions to listed buildings. When the Esplanade Hotel in Llandudno was refurbished in 2014, it made access for disabled people and their carers the focus of its business. The detailing on the access ramp echoes the fine art-deco veranda railings. © Crown copyright (2022), Cadw, Welsh Government





# 1— Why Access Matters

## Caernarfon Castle, Caernarfon

The historic environment is a resource for everyone to enjoy. Providing access to a medieval fortress like Caernarfon Castle is a challenge, but there is a ramp to the main entrance and level surfaces in the inner wards.

Cadw welcomes disabled visitors and their carers into its sites free of charge. © Crown copyright (2022), Visit Wales



**Cadw recognises that everyone should be able to enjoy easy and inclusive access to the historic environment. Removing the barriers to access can allow many more people to use and benefit from the historic environment and, if done sensitively, need not compromise the ability of future generations to do the same.**

Providing easy access to properties that have changes of level, uneven routes and other obstacles can seem daunting. It is nevertheless remarkable how much can be achieved with careful thought and good advice. While physical barriers often pose the greatest challenges, improvements to interpretation and services can also increase people's ability to engage with our cultural heritage, compensating at least in part for any unavoidable limitations to physical access.

Making it easier to use listed buildings and their surrounding landscapes can also be a legislative requirement. Not only does the Well-being of Future Generations (Wales) Act 2015 embed the goal of a more equal Wales in law, but the Equality Act 2010 also gives people protection from discrimination in a range of areas including the accessing of services, education and employment.

There may be scope for a greater range of works to receive advance consent where they have been defined and agreed in an existing conservation management plan.

The Welsh Government has adopted the social model of disability,<sup>10</sup> which is enshrined in the United Nations Convention on the Rights of Persons with Disabilities.<sup>11</sup> The social model makes an important distinction between 'impairment' and 'disability'. It recognises that people with impairments are disabled by barriers that commonly exist in society. These barriers include negative attitudes and physical and organisational barriers that can prevent disabled people's inclusion and participation in all walks of life. To help implement the principles of the convention, the Welsh Government publishes a strategic equality plan, which sets out its equality objectives and the actions to achieve them.<sup>12</sup> *Managing Easy Access to Listed Buildings in Wales* is based on these principles and helps to fulfil the Welsh Government's commitment to giving disabled people more independence, choice and control.

## Conservation Principles

---

Listed buildings are protected not for their own sake but for our benefit and that of the generations who will succeed us. They are an integral part of our cultural identity and contribute towards a strong sense of place, whether in a local, regional or national context. They are irreplaceable, but sometimes they need to be modified to meet the changing needs of those that use them. The survival of most listed buildings depends upon their continued, viable use and this may, among other things, require alterations to improve access.

Sensitive alteration will take into account what it is that makes a particular building special or significant. Significance may arise from its distinctive physical features, from its layout and relative completeness, from the materials and methods of its construction, or from its association with particular personalities and events. Significance may also lie in the archaeological remains that survive hidden in the ground below. Understanding the significance of a building is a vital first step in thinking about how much it can be changed.

In most cases access can be improved without compromising the special interest of listed buildings. There are only rare occasions when nothing can be done to improve or facilitate access. By undertaking a careful process of research, brief-taking, consultation and creative exploration of alternatives, good-quality solutions that add a new layer of history to our listed buildings are usually possible.

Cadw's *Conservation Principles for the Sustainable Management of the Historic Environment in Wales*<sup>13</sup> sets out a consistent approach to making decisions about all aspects of the historic environment. It also shows how its protection can be reconciled with the economic and social needs and aspirations of the people who live in it. *Conservation Principles* align with *Planning Policy Wales*,<sup>14</sup> which sets out the Welsh Government's national planning policies for Wales. The principles also provide a framework for sustainable development and give strategies for conserving and enhancing the historic environment. The provision of easy access can be an important part of a sustainable approach to caring for the historic environment. *Conservation Principles* shows how access can be improved without compromising the significance of special places.

## Gloddaeth Church, Llandudno

Gloddaeth Church's bold contribution to the townscape of Llandudno reflects its important position in the life of the town. It is important that it is accessible to all. Reordering work completed in 2017 included improved access arrangements to the church and adjacent hall. A ramp is tucked in behind the existing boundary wall, with light railings to minimise visual impact. © Crown copyright (2022), Cadw, Welsh Government



## 1.2

# Well-being of Future Generations

---

The Well-being of Future Generations (Wales) Act 2015<sup>15</sup> sets out to improve the social, economic, environmental and cultural well-being of Wales. Public bodies listed in the Act must think more about the long term, work better with people, communities and each other, look to prevent problems and take a more joined-up approach. It puts in place seven well-being goals, including a more equal Wales, which provide the framework to help create a Wales fit for now and the future. This groundbreaking legislation means that all public authorities in Wales must adopt policies and plans consistent with this ambition, recognising that equality is one of the basic human rights.

The Welsh Government has adopted the United Nations Convention on the Rights of the Child 1989 (UNCRC)<sup>16</sup> as the basis of all policy making for children and young people. Under the Rights of Children and Young Persons (Wales) Measure 2011,<sup>17</sup> the Welsh Ministers must have due regard to the UNCRC in the exercise of their functions.

Article 31 of UNCRC sets out that 'States Parties shall respect and promote the right of the child to participate fully in cultural and artistic life and shall encourage the provision of appropriate and equal opportunities for cultural, artistic, recreational and leisure activity'. Article 23 states that 'a mentally or physically disabled child should enjoy a full and decent life, in conditions which ensure dignity, promote self-reliance and facilitate the child's active participation in the community'.

Good-quality access arrangements that address the specific needs of children as 'people' will accordingly have a positive impact in ensuring that children in Wales are able to enjoy their human rights, including the right to participate freely in cultural life and the arts. The importance of providing children with opportunities to participate in matters affecting them is also recognised; therefore, whenever there are occasions to work collaboratively and to consult, children and young people should be included.

## 1.3

# Equality

---

The Equality Act 2010,<sup>18</sup> the Wales-specific equality duties<sup>19</sup> and the Public Sector Equality Duty<sup>20</sup> provide a legal framework to protect the rights of individuals and advance equality of opportunity for all. The Act covers discrimination because of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. These categories are known as 'protected characteristics'. The Act sets out the different ways in which it is unlawful to treat someone. This includes direct and indirect discrimination, harassment, victimisation and failing to make a reasonable adjustment for a disabled person.

People and organisations who own, manage or occupy listed buildings in Wales, and who have duties under the service provider, employer, education and other provisions of the Act, need to ensure that they do not discriminate against people with protected characteristics. These provisions also apply to voluntary groups who care for buildings (such as places of worship) where a service is provided to the public. When considering physical access to listed buildings and their surroundings it is necessary to take account of duties relating to disabled people and to consider potential barriers to access. However, it is important to remember that the Equality Act 2010 is about people and not buildings. It does not include standards for accessible building design, though minimum standards are set out in BS 8300: *Design of an Accessible and Inclusive Built Environment*<sup>21</sup> and *Approved Document M of the Building Regulations; for Wales*,<sup>22</sup> which can help duty holders to provide a reasonable standard of access so that they fulfil their duties under the Act.



### 1.3.1 The Public Sector Equality Duty

The Public Sector Equality Duty,<sup>23</sup> which is made up of a general equality duty supported by Wales specific duties,<sup>24</sup> applies to public sector bodies in Wales listed in the Act. These include key organisations such as local authorities and the providers of health, transport and education services. Those bodies must have due regard to the need to eliminate unlawful discrimination, harassment and victimisation, advance equality of opportunity and foster good relations between different groups. This duty encourages consideration of physical access for disabled people and the making of appropriate adjustments.

### 1.3.2 Employers

All employers, large and small, have a duty to make reasonable adjustments to avoid substantial disadvantage to disabled employees. The duty to make these changes is not anticipatory, but in response to the needs of a specific individual who is disabled. It may, however, be more cost-effective to consider access improvements as part of a programme of planned refurbishment, thereby allowing for disabled people to be employed in the future without the need for further alterations.

### 1.3.3 Service Providers

The duty to make reasonable adjustments requires service providers to take positive steps to ensure that disabled people can access services at a standard that is as close as possible to that offered to the public at large. This duty may require service providers to make reasonable adjustments to any physical features, including furniture and displays, wherever disabled customers or potential customers would otherwise be at a substantial disadvantage compared with non-disabled people.

Unlike the duty imposed on employers, this is an anticipatory duty; service providers are required to anticipate the needs of disabled people and to accommodate them in a wide variety of ways. The duty to make reasonable adjustments is also a continuous one and service providers will need to review the changes they have made at periodic intervals.

### 1.3.4 Volunteers

Volunteers may also be protected under the Equality Act 2010. If volunteers have a contract and receive more than just out-of-pocket expenses then they may be treated as employees. Other volunteers may also be protected as guidance states that providing someone with a volunteering opportunity counts as providing them with a service and so service-provider duties come into play.

### 1.3.5 Educational Institutions

Post-16 educational institutions have a duty to make reasonable adjustments for disabled students, including modifications to physical features. This duty is similar to that imposed on service providers and is again anticipatory.

Where educational buildings are used for conferences, banquets and other non-educational purposes, this is likely to give rise to service-provider duties.

*The Equality Act 2010 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.*

## The Palace Cinema, Risca

The Palace Cinema in Risca had been closed for several years when it found a new lease of life as a library and customer service centre in 2011. A former shop adjacent to the cinema provided level access without the need to alter the cinema's striking façade; the pavement was mounded slightly to remove the need for a step. Inside, the library offers accessible computer facilities including adjustable workstations and chairs, big keyboards, track ball mice and accessibility software. © Crown copyright (2022), Cadw, Welsh Government



## 2–

# The Regulatory Framework

Improved accessibility should always be a priority, where practically possible, but this should not be at the expense of the character of a listed building or increase the risk of long-term deterioration to the building's fabric or fittings. This means developing creative and carefully considered proposals when planning changes to make listed buildings as accessible as possible.

To achieve the best solutions, pre-application consultation with conservation and access officers is recommended, as well as taking into account the views of Cadw and local access groups.

## 2.1

### Planning Permission

---

The planning system is used to manage the development of land and buildings; it is administered by planning authorities. Planning permission is required for most kinds of work that involve material alteration to the external appearance of a building. Most changes of use to a building also require planning permission.

A planning application for a major development and for certain types of proposal within a World Heritage Site or conservation area needs to be supported by a design and access statement.<sup>25</sup> The design and access statement sets out the design principles that have been applied to the proposal and describes how inclusive access is to be achieved. It needs to make particular reference to the needs of disabled people and can be used to explain any proposed reasonable adjustments to physical features of the building.

There is more information about design and access statements in the Welsh Government guidance, *Design and Access Statements in Wales*.<sup>26</sup>

## 2.2

# The Building Regulations 2010: Approved Document M for Use in Wales

---

Part M<sup>27</sup> of the Building Regulations is about access to and use of buildings. It applies to material alterations of and extensions to non-domestic buildings and to material changes to some non-domestic uses. The regulation requires reasonable provision to be made for people to gain access to the building and to use its facilities. Approved Document M gives guidance on meeting the regulation and sets out minimum standards for access.

The need to conserve the special characteristics of listed buildings is recognised in Approved Document M. It also recognises that there may be some departures from the guidance and recommends that these are explained in an access statement. A formal access statement must be included in a heritage impact statement for some listed building consent applications (see section 2.3).

Following the guidance in Approved Document M can be a helpful way to establish reasonable provision under the Equality Act 2010. Failing to meet the guidance need not automatically imply discrimination, however, as there may be other means of achieving the same end result. This approach is in line with the principles that underpin the protection of listed buildings, in that it can allow access to be provided in ways that avoid removing those features of a building which contribute to its significance, and thus to its listing.<sup>28</sup>

**BS 8300-1: 2018** *Design of an Accessible and Inclusive Built Environment. Part 1: External Environment — Code of Practice*

**BS 8300-2: 2018** *Design of an Accessible and Inclusive Built Environment. Part 2: Buildings — Code of Practice*

**BS 8300** provides guidance on good practice in the design of buildings and their approaches to allow convenient use by disabled people. The extent to which the standards apply to listed buildings will be determined on an individual basis. It should be noted that in certain respects guidance in BS 8300 differs from that in Approved Document M.



## 2.3

### Listed Building Consent

---

Under the terms of the Planning (Listed Buildings and Conservation Areas) Act 1990,<sup>29</sup> consent is required for any works of demolition, alteration or extension that will affect the character of a listed building, including any associated structures and fittings within its curtilage. Listed building legislation applies to both internal and external changes, irrespective of whether features are identified separately in the list description. Local planning authorities administer listed building consent and their advice should be sought on the need for consent at an early stage in the design process.

When seeking listed building consent, applications must be accompanied by a heritage impact statement, which is the culmination of a heritage impact assessment.<sup>30</sup> This should contain information about the architectural and historical significance of the building and assess the likely impact of the proposed changes.

The application must demonstrate why any potentially damaging works are necessary or desirable, thus establishing that a balance is being struck between conservation and change.

A formal statement on access must be included in heritage impact statements for proposed works which affect the access arrangements to or within any part of a listed building that is not used as a private dwelling. The local planning authority will be able to advise whether or not an access statement is required, but even if it is not mandatory, access should be taken into account during the heritage impact assessment.

Heritage impact assessment is a useful tool to inform access plans which are described more fully in section 3.1

#### Insole Court, Cardiff

---

An ambitious community project with funding from the National Lottery Heritage Fund is bringing Insole Court in Cardiff back to life. The mansion's once-derelict stable yard now accommodates a range of facilities, including a café, and hosts community, corporate and private functions. The choice of materials for the spacious ramped access helps it to enhance rather than detract from the character of the historic building. © Crown copyright (2022), Cadw, Welsh Government



## Heritage Impact Assessment: Access Statement

An access statement should examine all viable alternatives as part of the heritage impact assessment to identify the option that best provides reasonable access and has the least detrimental impact on the significance of the listed building. The access statement will need to make clear how the approach to inclusive design has balanced any duties required by the Equality Act 2010 with the historic and architectural significance of the listed building.

It should show that all reasonable steps have been taken to provide full access, whilst recognising that the significance of the listed building may sometimes constrain the options for doing so. The statement should record any specific issues, including any departure from the guidance set out in Approved Document M, and the range of options considered. If the design is not fully inclusive, the statement should explain why this is not possible.

If the historic character of the listed building is such that it cannot be altered in a way that would meet minimum levels of accessibility, other adaptations or procedures to meet the requirements of the Equality Act 2010 could be specified. These might include, for example, the use of portable equipment or changes to management practices.

Conversely, there may also be circumstances in which changes can be justified on the basis that inclusive design would enable the beneficial use of the listed building.

Essentially the access statement is a way of demonstrating that every effort has been made to provide an inclusive environment and it should not be used to justify lower standards of access provision.

Sections 3 and 4 of this best-practice guidance are a good source of helpful advice about inclusive design. A satisfactory solution can almost always be found so long as imaginative and innovative approaches are fully explored.

It may also be necessary to apply for listed building consent for temporary access measures, including those made in advance of permanent solutions being adopted, if these will affect the character of the building. The local planning authority will advise on the need for consent. Portable ramps that are not fixed in place and which are removed after use do not require consent.

There is more information about listed building consent, heritage impact statements and access statements in *Managing Change to Listed Buildings in Wales*<sup>31</sup> and *Heritage Impact Assessment in Wales*.<sup>32</sup>

## 2.4

### Ecclesiastical Exemption

Some denominations are exempted from the need to obtain listed building consent. This is because they have consent procedures which have been accepted by the Welsh Ministers as providing an appropriate level of protection for their listed buildings, which is at least equivalent to that in the secular system.<sup>33</sup> These denominations will advise on the need for consent through their own procedures.

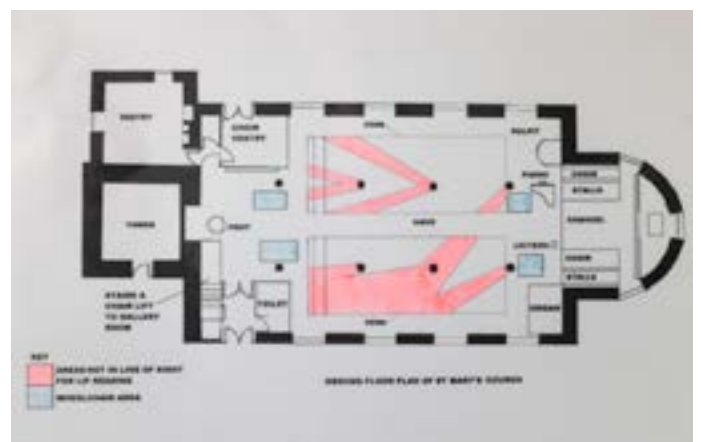
There is more information about the principles and practices for making changes to listed places of worship in *Managing Change to Historic Places of Worship in Wales: Ecclesiastical Exemption*.<sup>34</sup>

The Equality Act 2010 and the access principles described here are as relevant to listed buildings covered by ecclesiastical exemption as to all others. Most of the exempt denominations employ, or can signpost, disability advisers who can offer specialist help.

#### St Mary's Church, Dolgellau

A series of interventions has improved access at St Mary's Church in Dolgellau. A stairlift gives access to an upper gallery room, and the step up to the chancel is surmounted by a small ramp. The removal of some pews has created areas of open space suitable for wheelchairs, and a plan in the church porch indicates their position and maps sight lines. These relatively simple measures have proved effective, and the church enjoys a good reputation for its accessibility.

© Crown copyright (2022), Cadw, Welsh Government



## 2.5

### Scheduled Monument Consent

---

As well as being listed, some listed buildings and their surroundings may be protected as scheduled monuments under the Ancient Monuments and Archaeological Areas Act 1979.<sup>35</sup> Consent is required for any work to an archaeological site or building that has been designated as a scheduled monument. Where a listed building is also a scheduled monument, only scheduled monument consent will be required. Applications for scheduled monument consent are dealt with by Cadw.

There is more information about scheduled monument consent in *Managing Scheduled Monuments in Wales*.<sup>36</sup>

## 2.6

### Historic Parks and Gardens

---

The historic parks and gardens associated with listed buildings may also be of special historic interest in their own right and included on Cadw's register of historic parks and gardens in Wales. The register contains a diverse range of sites, including gardens, cemeteries and parks. If planning permission is required for any proposals that would affect registered historic parks and gardens, or their settings, the local planning authority must consult Cadw and may also consult with the Welsh Historic Gardens Trust.

There is more information about historic parks and gardens in *Managing Change to Registered Historic Parks and Gardens in Wales*.<sup>37</sup>

#### How to look up listings and other designations

Cof Cymru, Cadw's online database of Wales's designated historic assets ([cadw.gov.wales/historicenvironment/recordsv1/cof-cymru/?lang=en](http://cadw.gov.wales/historicenvironment/recordsv1/cof-cymru/?lang=en)), provides up-to-date information on:

- listed buildings
- scheduled monuments
- protected wreck sites
- registered historic parks and gardens
- World Heritage Sites.



# 3— Planning Better Access

## 3.1

### What is Reasonable?

---

The Equality Act 2010 places a legal duty on employers and service providers to make ‘reasonable adjustments’ to ensure that disabled people are not disadvantaged when visiting a property. Adjustments may be made by changing the way things are done, by making changes to the property itself, or by providing auxiliary aids and services. The identification of ‘reasonable adjustments’ will emerge from a clear appreciation of both access needs and the sensitivities of the building. An access strategy is a structured way of doing this, and helps set the direction for planning for change.



#### Celynyn Collieries Workmen’s Institute

---

The Celynyn Collieries Workmen’s Institute was built in 1908, and the Memorial Hall was added in 1924. The ‘Memo’ opened its doors again in 2014 as a fully refurbished events space, and the institute is now a resource centre. A new link extension provides the entrance for both spaces. The access ramp has been carefully designed with stonework that matches the building’s original plinth, and the light handrail minimises visual impact.

© Crown copyright (2022), Cadw, Welsh Government.



### 3.1.1 The Access Strategy and Plan

Any organisation, be it a high-street retailer, museum, restaurant or place of worship, that wants to make it easier for everyone to use its listed building is strongly advised to start by establishing an access strategy and plan — a document that answers six basic questions:

- What is it that needs to be improved — is it the building itself, the way it is managed or a combination of the two?
- What are the statutory obligations that have to be met?
- Which are the conservation considerations that need to be taken into account?
- Who is going to be responsible for balancing these requirements?
- What would be a reasonable adjustment?
- How much will it cost and how long is it going to take?

The secret of a successful strategy is clarity — making sure that the needs of visitors and users are as clearly understood as the sensitivities of the building that will be accommodating them. With careful planning it should be possible to provide suitable access for disabled people without compromising a building's special interest.

Strategic commitment from the top of the organisation is another vital component, so too is the presence of someone who will be responsible for implementing and reviewing the measures identified in the access planning process.

The Equality Act requires service providers to make reasonable adjustments for disabled people in the way they deliver their services. However, the Act does not specify how a service provider should go about meeting its obligations; it is up to them to decide whether they need to physically alter an obstructing feature or whether they can find a way of avoiding it by providing the same service in an alternative way.

It is not always necessary to remove an obstacle. In many cases the same desired result can be achieved by providing alternative routes or reorganising the use of spaces, without any need for physical alterations. To avoid making the wrong decisions organisations and professionals should never undertake access works without first understanding which solutions would actually be preferred by disabled people themselves. This means that it is vital to involve disabled people at all stages in the development of any project.

### 3.1.2 The Access Audit

The first step in planning access improvements is to undertake an access audit. This will assess and document barriers to access which exist within a building and its surroundings. A good audit will consider the requirements of wheelchair users, ambulant disabled people and those with sensory or cognitive impairments. It will consider intellectual access as well as physical access and can take into account the needs of families with young children, young people and older people.

It is helpful for the audit to follow the sequence of the visitor's journey through the building — from arrival on foot, by car or public transport, through entry into the building, access to each of the services and facilities provided, and finally to the exit route. An audit can also consider how people would be helped to leave in the event of an emergency.

The purpose of the audit is to compare the existing situation with best-practice guidance, thereby helping to identify any barriers to access that there may be. The auditor will make recommendations about possible ways of improving access, taking into account the use and nature of the building. It is recommended that someone experienced in assessing access issues should carry out the audit. Reference could be made to the National Register of Access Consultants.<sup>38</sup>

It is vital to involve disabled people during the audit process so as to make sure that their needs are fully appreciated at the earliest possible stage.

## Church of St Francis Xavier, Usk

A major renovation project at the Catholic Church of St Francis Xavier and St David Lewis in Usk was completed in 2019 with funding from the National Lottery Heritage Fund and others. It included extensive conservation work to the building, the development of educational and visitor resources, the creation of a chapel dedicated to St David Lewis on an underused upper floor, and the provision of full access to facilities on the ground floor. Access is provided through the east face of the porch, allowing for a 1:21 ramp. Although quite a radical intervention, it doesn't compromise the strong character of the building, and, combined with new toilet facilities inside, supports much wider use of the church. © Archdiocese of Cardiff; Volute Architects





### 1. Think Strategically

Set objectives including how to provide easy access for users without compromising the significance and character of the building.

Identify users including disabled people, older people, children, young people and families, and people with protected characteristics.

Consider available resources, including budget.



### 2. Understand Opportunities for Change

**Access audit** — completed with disabled user groups, preferably by an access expert

What is the existing situation?

What would good practice look like? (refer to guidance)

Make recommendations

**Heritage assessment** — preferably undertaken by a conservation specialist

Identify and describe the special architectural, historic and archaeological interest of the building and the significance of its constituent parts



### 3. Identify and Test Options for Change

#### Prepare draft access plan

Identify options for improving access in conjunction with user groups

Consult local authority planning and conservation officers (or denominational advisors where ecclesiastical exemption applies), conservation bodies and other relevant specialist organisations

Test options by carrying out a heritage impact assessment

Test affordability against budget

Are proposed adjustments reasonable?



### 4. Develop Specific Proposals

#### Development of proposals

Develop design where physical alteration is recommended — justify departure from Part M of the Building Regulations where necessary

Are consents required? Is a heritage impact statement required, with or without an access statement?

If planning permission is required, is a design and access statement needed?



### 5. Finalise the Access Plan

#### The access plan

Set out range of solutions, from physical alteration to operational changes

Implement in stages according to access needs, long-term strategy and budget

Review regularly in relation to the access strategy



### 3.1.3 The Assessment of Significance

A complementary part of the process will be to prepare a heritage assessment that establishes the significance of the listed building and its constituent parts in terms of its special architectural, historic or archaeological interest. The assessment needs to be prepared by someone with appropriate knowledge and understanding of the building, such as an architectural historian or conservation architect. Amenity societies, the Welsh archaeological trusts and local authorities may also be a source of guidance. The heritage assessment can also be used as a statement of significance in the heritage impact assessment process.

### 3.1.4 The Access Plan

Once an access audit and an assessment of significance have been completed, it becomes possible to prepare a detailed access plan that reconciles, where necessary, the needs of access and conservation. The plan will consider options for improvement, identify needs and impacts, and look at what is likely to be a reasonable adjustment. This stage of the process should include consultation not only with access and conservation bodies but with disabled people themselves.

**The aim of an access plan should be, as far as is reasonably practicable, to provide a standard of access for disabled people equal to that enjoyed by the rest of the public.**

The access plan will normally have four related objectives:

- establish short- and long-term aims in relation to opportunities
- set out proposed solutions, ranging from change of operational use to physical alteration, including compliance with or departure from Part M of the Buildings Regulations
- identify statutory consents or other approvals that are required, such as listed building consent, including the need for heritage impact statements and access statements, and planning permission, including the need for a design and access statement
- proposed timescales for implementation.

Linked to maintenance and management procedures, the plan can also help to ensure that access remains an ongoing priority. To make sure this happens, it should be reviewed at regular intervals and used to record decisions and alterations to the original scheme and timetable. Everyone involved in caring for the building or working in it should be aware of the access plan.

### The role of the conservation officer

The local authority's building conservation officer should be able to provide specialist advice on the repair and maintenance of listed buildings, including adaptation and alterations. This can be particularly valuable if alterations to improve access are likely to need planning permission or listed building consent.

It is the detailed preparation of the access plan that will confirm the need for any alterations to a listed building, including those alterations requiring listed building or scheduled monument consent and planning permission. However, the process should begin by considering all the other options available — including the provision of the service by other means — and assessing the impact that each of these would have on the building's significance. In effect, this equates to stages 3 and 4 of a heritage impact assessment, which identify proposed changes and assess their likely impact on the building's significance in order to arrive at an approach that realises the greatest benefit and causes the least harm.

If there are any conflicts between the interests of access and conservation, it may be possible to reconcile these through creative and sensitive design. For financial and operational reasons, physical works may need to be phased over a period of time, in which case the plan may need to allow for alternative ways of providing the service in the interim.

The access plan should not be restricted to wheelchair users. It also needs to consider the requirements of people with limited mobility, sensory and cognitive impairments, and the needs of families with young children, young people and older people. A well-drafted plan should be central to any organisation's strategic commitment to improving access. It also needs to be reviewed regularly so that the current provisions can be kept up to date, not only in terms of changes in regulations but also new technical solutions, both of which the service provider is duty-bound to take reasonable steps to comply with.

Focus groups made up of disabled people, or drawn from a local access group, can be invaluable in testing proposals before they are incorporated into the access plan. The finished plan can also be used as the basis of a heritage impact statement, including an access statement, and a design and access statement required for some statutory consents as well as providing a useful record of decisions taken in relation to duties under the Equality Act 2010.

### The role of officers who consider access

Officers who consider access are normally based in the planning and building control departments of local authorities. Their main role is likely to be providing advice on development proposals in relation to planning policy (whether or not the requirements for planning permission have been met) and/or Part M of the Building Regulations. As part of their role, they could also help to develop access policies and design guidance, and facilitate local access groups made up of disabled people. All of this makes them invaluable sources of practical advice on access improvements so they should be consulted as early as possible in the development of an access plan.

### 3.1.5 Management Issues

No access plan will be truly successful unless it is underpinned by a commitment from the very top of the organisation to meet or exceed currently agreed standards of good practice. Training and ongoing management support to make all staff aware of the agreed standards will also be essential. An accessible WC used to store cleaning materials rapidly ceases to be accessible; a cluttered reception desk with a profusion of leaflets and notices offers clear information to no one. Good access depends on the effective management of the whole service — in many instances a simple change in operational working can overcome an apparently stubborn physical access issue.

### 3.1.6 Funding for Access Improvements

Neither Cadw nor the National Lottery Heritage Fund is in a position to provide the owners of historic buildings with money specifically to improve access. However, the National Lottery Heritage Fund can fund physical and sensory access improvements to historic buildings or sites (including places of worship) if they form part of a wider project to repair and open up the building or site to the public. The National Lottery Heritage Fund can also grant-aid the completion of an access audit as part of the development phase of a project.

There may be other sources of funding in particular areas or for particular types of improvement. There may also be indirect economic benefits associated with access works; they may, for instance, benefit from lower VAT rates.

## 3.2

## Barriers to Access

### 3.2.1 Overcoming Barriers

First and foremost, the access planning process is about finding ways to overcome the barriers to access that are the concern of the Equality Act 2010 — and especially those relating to physical obstructions. All service providers covered by the Equality Act 2010 are required to make whatever reasonable adjustments are necessary to ensure that disabled people are not put at a substantial disadvantage. Potential obstacles fall into two broad categories:

- external physical elements of the building and its setting, including landscape features, kerbs, exterior surfaces, paving, parking areas, building entrances and exits as well as emergency escape routes
- any feature arising from the design or construction of a building itself, including architectural details (such as plinths, column bases, staircases, ironwork and door openings), fixtures, fittings, furnishings, furniture, equipment and other materials.

It is important that each feature is properly understood, both in its own right and in the context of the whole building. Every effort should be made to leave features unchanged and visible if they contribute to the building's significance, character or composition. In some circumstances a reasonable adjustment may involve avoiding a feature rather than making an alteration.

The type of service or activity that takes place within the building will also be a major factor in determining the appropriate level of access and the required degree of alteration. Factors that might affect whether a potential adjustment is seen as reasonable include the effectiveness of the change, its practicability and cost, and the size and financial resources of an organisation.

Any necessary changes to access that result from a proposed change of use related to service-provider or education functions need to be considered carefully so that they can be accommodated sensitively within the existing structure.

## The National Library of Wales, Aberystwyth

The National Library of Wales occupies a commanding position overlooking Aberystwyth. As a national institution, it was intended to be imposing, and the principal entrance was designed for dramatic effect. Its high podium reached by a long flight of steps forms a strong centrepiece of the building's composition — too high for ramped access and too formal for an external lift to be appropriate. The solution was to modify an existing ground-floor entrance and designate it as the new main entrance for all visitors. Full access was achieved by moving the original steps forward to permit an adjacent ramp to land on a level area in front of the steps. The ramp is designed in a complementary style and uses matching materials. The original building has a strong horizontal emphasis, and the use of horizontal parapet walls surmounted by a glass barrier means that the handrail is the only visible sloping element in the design. Inside the library, there is level access to reception, toilets and cloakrooms, and lifts to all areas. Other changes designed to enhance the visitor experience include the installation of audio loops, the use of colour differentials, and the use of Braille.

© Crown copyright (2022), Visit Wales / © Crown copyright (2022), Cadw, Welsh Government







### Cardiff Law Courts

The Cardiff Law Courts are housed in another very formal building, with the original entrance on a high podium above a grand entrance stair. This is an essential part of the character of the building. Level access has been provided by modifying an existing pavement-level door and, within, a lift takes visitors to all levels of the building. An adjacent disabled parking bay further facilitates access. It was not possible to make this the main entrance, but disabled visitors reach the main hallway from the lift.

© Crown copyright (2022), Cadw, Welsh Government



### Church Hall, Usk

The only access to this little church hall in Usk was originally through a gap in the railings in front of the doorway and then up a step. A ramp, with a handrail mounted on the wall of the building, now makes it much more accessible. The historic railings were repositioned to protect the ramp and a new opening formed through them. This low-key but effective solution to improve access respected the historic character of the building, minimising loss of historic fabric and detail.

© Crown copyright (2022), Cadw, Welsh Government





## Hanbury Road Chapel, Bargoed

Sometimes, radical interventions are needed to help to give historic buildings a new lease of life and support full and inclusive use. When the Hanbury Road Chapel in Bargoed was converted for use as a library, a rear extension accommodated community facilities, a worship space and a café, and provided level access to the entire building via a lift. The original street-facing façade remains in use, but the building now has a second front facing the car park at the back. © Crown copyright (2022), Cadw, Welsh Government.



### Dialogue and discussion

Cadw encourages early pre-application consultation with local authority conservation, building control and planning officers, relevant specialist organisations (including denominational advisors in the case of historic places of worship) and local access groups. Applications involving access provisions are reviewed by officers in planning departments, who should be able to advise on the suitability of the proposed solutions, or recommend alternative sources of advice and guidance. Where the proposed changes are likely to have a major impact on the significance of the building, Cadw can also be involved in pre-application meetings alongside the local planning authority.

Continuous dialogue and feedback from users can ease the handling of applications for listed building and other consents, and help to achieve solutions which combine access and conservation.

The Equality Act 2010 includes four options for overcoming a barrier caused by a physical feature.<sup>39</sup> These are:

- removal of the feature
- alterations to the feature
- providing a reasonable means of avoiding it
- providing the service by a reasonable alternative method if none of the preceding options is viable.

The Act does not prescribe which option should be considered first, but the statutory code of practice recommends that service providers should start by considering whether the physical feature which creates a barrier can be removed or altered.<sup>40</sup> This represents an inclusive approach to access because it makes services available to everyone in the same way. The Act requires that any means of avoiding the physical feature must be a 'reasonable' one. In determining reasonableness, consideration should be given to the dignity of disabled people and the extent to which they are caused inconvenience or anxiety. It should always be remembered that the aim is to achieve an equal standard of access for everyone.

### 3.2.2 Removing the Feature

Before removing a feature, it will be essential to assess the contribution that the feature makes to the building as a whole, and to set this against the costs and benefits which removal might bring. This will determine what is reasonable.

For example, a narrow doorway or staircase may be the feature which makes up the special interest of a building but also forms the barrier to access. In this case, removal is unlikely to constitute a reasonable adjustment and an alternative solution will be more appropriate.

### 3.2.3 Altering the Feature

Alterations that do not affect the historic fabric or quality of the building adversely may be possible. The heritage impact and access statements can be used to explain the constraints and justify why the proposed alterations are reasonable, including any departure from the guidance set out in Approved Document M of the Building Regulations.

Alternatives that look beyond standard solutions might include the sympathetic alteration of physical features.

### 3.2.4 Finding Ways Around Barriers to Access

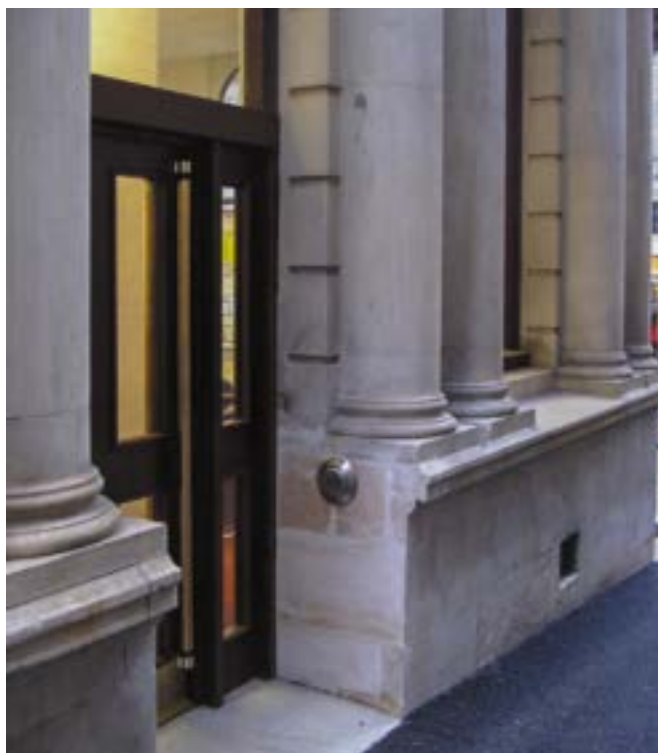
It may be possible to avoid a barrier by changing the way in which a building is managed and used. For example, if the principal entrance is inaccessible and it is inappropriate to alter it, access could be provided by an alternative route or by opening up a secondary main entrance. The principal entrance would still be available, but the preferred option would be for everyone to use the accessible entrance. Any alternative entrance should respect the dignity of users.

This may require further changes to the management of the building and to the use of its internal spaces. For example, relocating public services from the upper to the ground floor could further improve access. Circulation routes within a building could be adjusted to avoid barriers such as stepped thresholds and narrow doorways.

## Bank, Cardigan

The narrow pavement outside this bank in Cardigan meant that an external ramp was not an option. However, the lane to the side of the building rises to the internal floor level, and this was exploited to improve access. The lane was resurfaced, and an existing window modified to create a doorway. Motorised doors operated by a large low-level button give easy additional access directly to the banking hall.

© Crown copyright (2022), Cadw, Welsh Government



### 3.2.5 Providing the Service in Another Way

This approach can be considered in addition to those discussed above, or where physical changes have been considered and rejected. For example, where physical barriers cannot be overcome, service providers might investigate using print, computer or audio-visual means to provide access to the service. In such instances, disabled users should be consulted to find out whether it is acceptable for the service to be provided in a different way from that offered to others.

However, this approach may not be considered reasonable on its own if one of the other options would have provided a more inclusive service for all users.

#### Reasonable Adjustments in Practice

The Equality Act 2010 statutory code of practice guidance for service providers gives a list of measures that can be taken to identify or make reasonable adjustments.<sup>41</sup> This list is not exhaustive and, in many cases, more than one of these measures may be needed:

- planning in advance for the requirements of disabled people and reviewing the reasonable adjustments in place

- conducting access audits on premises
- asking disabled customers for their views on reasonable adjustments
- consulting local and national disability groups
- drawing disabled people's attention to relevant reasonable adjustments so they know they can use the service
- properly maintaining auxiliary aids and having contingency plans in place in case of the failure of the auxiliary aid
- training employees to appreciate how to respond to requests for reasonable adjustment
- encouraging employees to develop additional serving skills for disabled people (for example, communicating with hearing-impaired people)
- ensuring that employees are aware of the duty to make reasonable adjustments and understand how to communicate with disabled customers so that such adjustments can be identified and made.

#### Bank, Rhyl

This bank in Rhyl has two entrances, both of which are used to afford full access to its facilities. The original principal entrance remains unchanged, but, inside the building, the counter area has been moved to the side entrance. This ramped entrance thus provides the most direct access to the customer service area, and customers entering via the grand corner doorway are directed through the building to the counter area.

© Crown copyright (2022), Cadw, Welsh Government





# 4– Making Access a Reality

## 4.1 Practical Advice and Examples

Easy physical access involves people being able to circulate freely and cope with changes in level. Horizontal movement is most likely to be constrained by floor surfaces, corridors, doorways, thresholds and small changes in level. Improvements to vertical circulation may require alterations to steps, stairs and handrails or involve the introduction of ramps or lifts. All of these can affect the appearance and significance of the building. Path surfaces, steps and gradients present similar issues in parks and gardens and much of the guidance below will be equally applicable to outdoor environments.

What follows is an overview of situations in which difficult decisions often need to be made. Some of the examples may not conform strictly to guidance in Approved Document M of the Building Regulations but nevertheless achieve a successful balance between reasonable adjustment and the sensitivities of historic places.

This section contains general guidance on common themes. Specialist advice for particular building types may also be available from organisations referenced under 'Further Information' below.

Where there is a physical barrier, the service provider's aim should be to make its services accessible to disabled people and, in particular, to provide access to a service as close as it is reasonably possible to get to the standard normally offered to the public at large. When considering which option to adopt, service providers must balance and compare the alternatives in light of the policy of the Act, which is, as far as is reasonably practicable, to approximate the access enjoyed by disabled persons to that enjoyed by the rest of the public.

Equality Act 2010, Services, Public Functions and Associations: Statutory Code of Practice, 2011, 7.58<sup>42</sup>

## 4.2 General Considerations

The form and layout of listed buildings may be important aspects of their architectural character and aesthetic value. They may also contribute to their historic interest, providing evidence of their purpose, age and development. Understanding the design principles underlying the arrangement of facades and the organisation of interior spaces is a vital starting point when planning changes intended to improve access.

For example, large secular buildings were often designed with a hierarchy of spaces and a prescribed sequence of movement through the building — the entrance hall, principal staircase, primary corridor and principal rooms. Similarly, places of worship also have a hierarchy of spaces reflecting the way in which they were designed to be used. The form and decoration of each of these spaces may be part of the building's special interest and the visual impact of any alteration must be carefully considered. In smaller buildings there may simply be too little space for additions such as ramps or lifts, while the visual impact might be damaging.

When dealing with level changes and restricted space, the conservation concerns are likely to centre on issues of scale, proportion and continuity in materials, design and finish, as well as structural factors affecting corridor widths and floor levels.



## 4.3

# Horizontal Movement

---

### 4.3.1 Making an Entrance

The aim should be to make a building's main entrance accessible to everyone on a permanent basis. Conservation constraints may arise from the design and character of the building's facade and setting,

and each building will have its own characteristics which should, as far as possible, be respected in considering alterations for access.

#### Temple of Peace, Cardiff

---

The Temple of Peace in Cardiff is a classical building, designed to be rigorously symmetrical. Like many other classical buildings, the entrance is raised on a podium. To improve access whilst respecting the character of the building, symmetrical ramps were built flanking the portico. © Crown copyright (2022), Cadw, Welsh Government



Classical buildings, for example, are usually built to a single, unified plan that follows strict rules of symmetry and proportion. Derived from the idea of a temple, the entrance is often set upon a base and approached by a flight of steps. Alterations to such buildings need to respect these rules, although sometimes relatively small-scale changes may break them without significantly affecting the appearance.

Symmetry may be less of an issue in other types of less formal architecture. Proportion and balance will still be important, but greater flexibility may allow the insertion of a single asymmetrical ramp, for example.

### **Nineteenth-century house, University of Bangor**

---

This late nineteenth-century house is now part of the University of Bangor. The access ramp has been designed on a diagonal axis, which fits comfortably with the building's eccentric mix of styles and picturesque asymmetry.

© Crown copyright (2022), Cadw, Welsh Government





Georgian and Victorian terraced houses with steps up to the front door can pose seemingly intractable problems in relation to access. Alternative entrance points such as a mews may be available. Alternatively, a basement area between the building and the pavement may allow the incorporation of a platform lift to provide access from street level to the basement floor. Platform lifts can often be visually less intrusive than ramps over basement areas.

In urban locations, space in front of buildings will frequently be restricted. Where it is available, it may be possible to regrade the pedestrian approach up to or within a porch or portico. Where an existing entrance cannot be adapted it may be possible to form a new accessible entrance for everyone to use.

### Church, Cardiff

---

The original steps in front of this church in the centre of Cardiff were surmounted by removing the boundary wall which originally enclosed the forecourt, and raising the pavement. The paving slopes in two directions, so that the church door can be approached from either street. © Crown copyright (2022), Cadw, Welsh Government



### 4.3.2 Doors and Openings

Door and window openings establish the character of an elevation and are an integral part of the facade; alterations to their proportions or detail should generally be avoided.

Where the principal entrance is a key element in the design of a building facade, the door frame or surround and the door itself are likely to be significant. Alteration may be possible but should be carefully considered. In the case of heavy doors it may be possible to add a powered opening device or at least a bell to call for assistance.

Approved Document M recommends an 800mm clear opening for a head-on approach in new buildings, although the majority of manually propelled wheelchairs can manage with slightly less than this. A compromise may therefore be possible, subject to consultation. Approved Document M suggests a minimum clear width of 750mm in existing buildings and 775mm for external doors.

Room to manoeuvre alongside the leading edge of a door is particularly important. Where space is inadequate and an alternative route is not feasible, doors could be held open or even removed.

Wheelchairs and other mobility aids can inadvertently damage narrow door cases and joinery. Applied protection may be necessary to safeguard the historic fabric.

Double doors with narrow leaves can also pose a problem as it can be difficult for a wheelchair user to open both doors together. Doors can be held open with electromagnetic catches, linked, if necessary, to a fire alarm system. Powered opening may be possible, although the addition of devices may cause damage to joinery. It may even be possible to fix the leaves together to act as a single door. Sometimes leaves may have to be replaced with ones of unequal width, to provide a clear 800mm opening on one side.

The addition of vision panels in important historic doors is rarely acceptable. It is more usual to hold doors open to achieve improved access.

Every effort should be made to retain historic door furniture or traditional ironmongery that is integral to the design and character of the door. Automating the door opening or relying on staff assistance is likely to be preferable to replacing significant fittings with lever-type handles. Consideration should be given to the height, ease of use and visual contrast between the handle and door. Self-closing mechanisms with an abrupt or heavy action should be regularly adjusted to their minimum operating pressure.



City centre bank, Cardiff

Originally there were two granite steps at the entrance to this prominent city centre bank in Cardiff. Ramped access was achieved by mounding the pavement to achieve most of the level difference, then trimming the nosing of the last step and dressing the stone into an angle. The ramp continues to the original solid doors, which are fixed open during the day. There is a new level porch in front of modern automatic doors.

© Crown copyright (2022), Cadw, Welsh Government



Old Bank, Abergavenny

At the Old Bank in Abergavenny, the leaves of the original door are held open during business hours, and an automatic door has been inserted inside.

© Crown copyright (2022), Cadw, Welsh Government



### 4.3.3 Thresholds

The generally accepted maximum raised threshold over which an independent wheelchair user can manoeuvre is 15mm, although in practice some people may be able to negotiate a slightly higher one, especially if the leading edge is bevelled. Short temporary threshold ramps can be provided, though care should be taken to ensure they are used safely.

In timber-framed buildings every effort should be made to avoid cutting sill plates or other framing members that contribute to the building's structural integrity. A bevelled fillet on either side can resolve a small difference in height. If sill plates are to be covered by a raised floor or ramp, care should be taken to maintain ventilation and avoid moisture entrapment, which can lead to timber decay.

### 4.3.4 Floors

Routes through buildings need to be free of trip hazards and smooth enough for easy wheelchair use. However, the levelling or alteration of historic floors should only be considered as a last resort once other less potentially damaging options have been fully considered. If the historic floor surface is particularly fragile, it is likely to require protection against foot traffic and wheelchairs, especially the heavy electrically powered ones. A temporary covering, removable for occasional viewing, may be the only appropriate answer. In such cases, fully accessible information about the floor and its importance should be available nearby.

Over-polished floors can be hazardous and slip-resistant finishes are important, particularly in areas where the floor may become wet. Loose rugs without any underlay to anchor them or with edges creating a trip hazard should also be avoided. Thick pile carpets can hinder wheelchair passage.

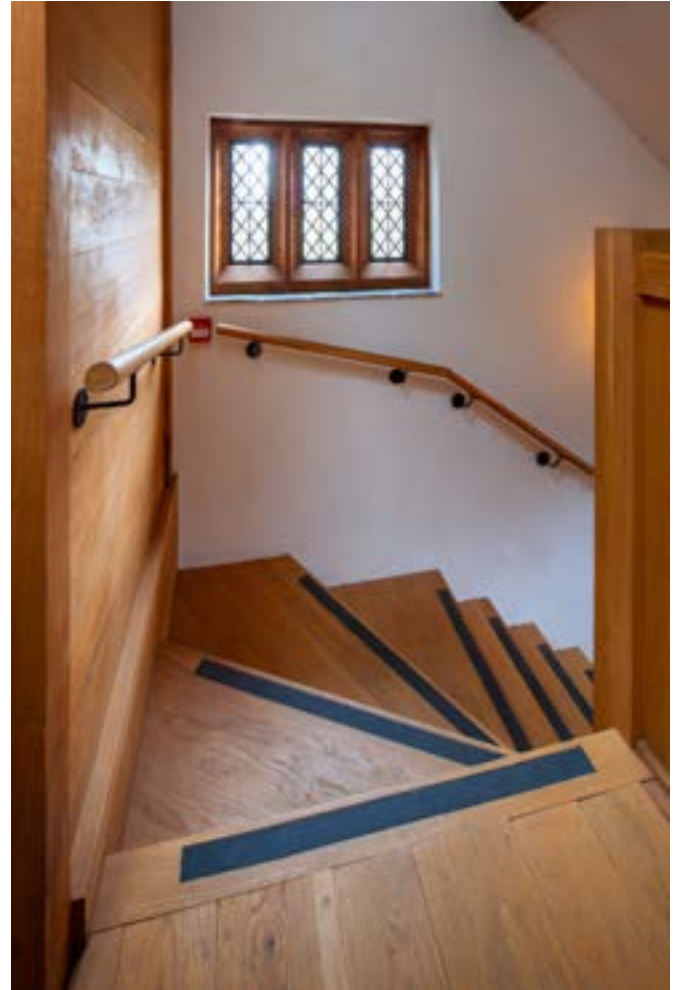
### 4.3.5 Corridors

Circulation routes must allow easy movement and provide a sense of location and direction. The preferred unobstructed width of a corridor is 1200mm, though 1800mm is recommended to allow wheelchair users to pass each other.

### 4.3.6 Visual contrast

Visual contrast can be a useful way to distinguish floor and wall surfaces and thus help people to orient themselves. Contrasting tones for doors or door frames and potential obstructions will also help people to move around safely. Light reflectance values (LRVs) should be checked to ensure adequate contrast. Approved Document M advises that there should be at least 30 points difference in the LRVs of visually contrasting surfaces.

Visual contrast to step nosings is recommended and can be particularly helpful for people with visual impairments. Tactile metal studs may also be appropriate in some situations. Contrasting nosings can be provided on carpeted stairs, removable paint can be used if appropriate and where alteration is not possible directional lighting can help provide shadow contrast.



### Llancaiach Fawr

Llancaiach Fawr is a grade I listed sixteenth-century house run as a visitor attraction by Caerphilly County Borough Council. Many improvements to access were made when the house was refurbished. These included the bold decision to add an entirely new block to the house, accommodating a new staircase and lift. The house is presented as it might have appeared in 1645, and the new block has been designed to fit comfortably with that period. The new staircase is of traditional appearance, but the stairs themselves are level and have coarse safety grips.

© Crown copyright (2022), Cadw, Welsh Government

### St Cadoc's Church, Raglan

---

At St Cadoc's Church, Raglan, the step between the main body of the church and the chancel has been left uncarpeted to provide visual contrast, drawing attention to the height difference.

© Crown copyright (2022), Cadw, Welsh Government



### Great Hall, Llancaiach Fawr

---

The Great Hall at Llancaiach Fawr is on the first floor, and historical level changes mean that it is not accessible by wheelchair. However, steps and level changes have been evened up to improve accessibility for all ambulant visitors, and the dais step has been finished with a contrasting material to draw attention to the height difference. A virtual tour is available on a screen in the visitor centre for those unable to visit the Great Hall.

© Crown copyright (2022), Cadw, Welsh Government





## 4.4

# Vertical Movement

### 4.4.1 Ramps

Ramps are usually preferable to platform lifts and can provide easy and convenient access provided gradients are not too steep or too long. They also tend to be cheaper and much easier to maintain. However, where changes of level are too great, where there is inadequate space or there is an established need to protect architectural or archaeological features, a lift may still have to be considered.

#### Llandudno bank

The entrance to this grand Llandudno bank is raised up steps in a recessed semi-circular porch. Improved access is provided by a ramp, which, although quite steep, is also short. The ramp has been built using high-quality materials and detail that complements the exceptional quality of the original building.

© Crown copyright (2022), Cadw, Welsh Government



Any slope of 1:20 or steeper is defined as a ramp by Approved Document M. Gradients should be as shallow as practicable as steep slopes create difficulties for some wheelchair users and ambulant disabled people. Approved Document M advises a maximum gradient of 1:12 for a distance of up to 2m between level landings. A longer ramp is acceptable where the gradient is shallower and suitable landings are provided. In exceptional circumstances, steeper grades over shorter distances may be preferable to no ramp at all, although these will not be suitable for some wheelchair users without assistance and care should be taken to ensure safe use. Electrically powered wheelchairs can generally cope with steeper slopes than manually propelled ones. The case for a steeper or longer ramp than that recommended in the Approved Document M would need to be made in the access statement as part of the heritage impact statement.

When forming permanent ramps and raising floor levels, account should be taken of design features such as skirtings, plinths or dado rails. These can often make important contributions to the scale and proportion of a room.

#### Gloddaeth Church, Llandudno

At Gloddaeth Church, Llandudno, a long ramp with a shallow gradient provides easy access to both the church and the adjacent hall.

© Crown copyright (2022), Cadw, Welsh Government





## Hotel in Llandudno

At this Llandudno hotel, the constrained site combined with the elevated position of the building necessitated a longer than usual access ramp. The design and detail are such that it blends successfully into the surrounding townscape. © Crown copyright (2022), Cadw, Welsh Government





Temporary ramps can have a detrimental visual impact and are unlikely to provide a satisfactory long-term solution to access problems. However, they may be considered a reasonable adjustment prior to the provision of a planned permanent solution, or where access may be needed for a relatively short period in a building's life, or where use is infrequent. Temporary measures should be made to the same standards of design and construction as permanent interventions, not least because they may also require formal approval. Just like permanent arrangements, they should seek to minimise visual impact and to provide the greatest possible degree of integration and independence.

In places of worship, changes in floor levels may have historical and liturgical significance. Where level changes are not great a temporary ramp might be considered though a permanent intervention, carefully designed to respect the historic integrity of its surroundings, is always preferable.

The use of portable ramps has management implications, such as the availability of staff to erect and remove them as required and to ensure their safe use.

They may be used from time to time for a single visitor, or periodically for an event lasting several days. As well as avoiding the risk of visual intrusion, portable ramps may also be preferable for smaller properties or those where wheelchair use is infrequent. Appropriate staffing arrangements, training and storage space are integral parts of the solution.

Many ambulant disabled people do not find ramps easy to use. Where a change of level is greater than 300mm it is recommended that steps are provided as well as a ramp. Changes of level of 2m or more should be accompanied by an alternative means of access such as a lift.

#### 4.4.2 Stairs and Landings

The principal staircase is often the major element in the most important public space within a building. It is therefore likely to be of considerable architectural and historic importance. Such staircases often fail to comply with current standards and changing them is likely to be contentious. An alternative solution may be possible if there is a secondary staircase that would be less sensitive to alteration.

### Holyhead's historic market hall

---

Holyhead's historic market hall is now a library. An important aim of the conversion was inclusive access and a user group convened for the project included representation from disabled people. A long ramp rises from the building's entrance to the library floor, but the design incorporates a landing space to break up the length, and also provides good visual contrast, and generously proportioned handrails.

Isle of Anglesey County Council; © Andy Marshall



## Christ Church, Bala

Making the church a welcoming space for all was an important driver in the comprehensive reordering scheme at Christ Church, Bala. The church now has a light and open worship space, and the design incorporates an elegant ramp alongside the steps giving access to the chancel.

© Crown copyright (2022), Cadw, Welsh Government / © Michael Plane, Diocese of St Asaph



#### 4.4.3 Handrails

Handrails are highly visible and so represent a critical design issue. The introduction of new handrails to stairs will inevitably have an impact on the character of existing spaces and features, even when designed with great care and sensitivity. Detailed design studies, supported by accurate drawings and visualisations, are essential if such interventions are to be properly planned and their impact fully understood.

In older buildings, handrails were not generally designed to extend 300mm beyond the first or last riser, or to have the currently recommended profile. Where handrails do not extend or have a profile that cannot be gripped it may be possible to insert a more suitable additional rail. Current standards require all flights of steps to have handrails on both sides and additional central handrails where a flight is more than 1800mm wide. On wider flights, where side handrails cannot be provided, a single, central handrail gives the desired left- and right-hand option. On narrow stairways, one good handrail is better than none.

The historic context of a staircase may suggest the replication of an existing handrail design that does not comply fully with guidance in Approved Document M, but which could nonetheless be regarded as a reasonable adjustment. Where conservation and aesthetic considerations require the retention of non-compliant but historic handrails then this issue should be raised in the access statement in the heritage impact statement.

#### Llancaiach Fawr attics

The attics at Llancaiach Fawr present a particular access challenge as the original turning stair is uneven and steep. A new iron handrail now helps ambulant visitors to reach the attics, which are shown as the servants' quarters of the house. By careful design, the rail enhances rather than detracts from the character of this historic feature. © Crown copyright (2022), Cadw, Welsh Government





## City Hall, Cardiff

---

In Cardiff City Hall, a platform lift overcomes the steps in the entrance lobby. In order to install it, a small portion of the grand entrance stair was removed and a doorway was cut through one of the curved flanking walls of the entrance hall. The handrails on the steps were installed some time ago: brass is a traditional material that provides good visual contrast. The large round profile is easy to grasp. © Crown copyright (2022), Cadw, Welsh Government





## Stair tower at Llancaiach Fawr

---

The new stair tower at Llancaiach Fawr echoes the style of the original sixteenth-century house, but the traditional limewash finish draws a subtle distinction between old and new. Ramped access is concealed behind the stone parapet wall. © Crown copyright (2022), Cadw, Welsh Government





## Llancaiach Fawr

One of the distinguishing features of Llancaiach Fawr is the sheer number of internal staircases which originally provided a network of escape routes in an outwardly undefended building. There are also many internal level changes, which present access challenges for today's visitors. In one instance removable wooden steps have been placed on top of the original stone ones to offer an even surface. New handrails added to historic stairs also help facilitate easier access.

© Crown copyright (2022), Cadw, Welsh Government



## Llancaiach Fawr

A platform lift provides access to the first and second floors of the historic house from the new stair tower.

© Crown copyright (2022), Cadw, Welsh Government



#### 4.4.4 Lifts

The best way to provide accessible circulation between different floors of a building is to install an integrated and suitably sized passenger lift. As well as helping wheelchair users it can also be of benefit to ambulant disabled people, older people and people with pushchairs. A passenger lift is more likely to be feasible in larger buildings. Where space is at a premium or a lower-cost solution is required, a short-rise platform lift may be a more viable solution.

Passenger and platform lifts are best located in the less-sensitive parts of listed buildings, for example, secondary staircases and light wells or in areas that have already been disturbed or altered. Pits and openings for lift shafts should be carefully located to avoid loss or damage to significant timbers, archaeological remains or decorative surfaces.

Lift controls should be designed for ease of use by everyone and should incorporate tactile, visually contrasting illuminated buttons set at an appropriate height and location. Audible information can help people using and waiting for the lift.

The lift car should be large enough to accommodate any type of wheelchair with at least one other passenger. A lift car 2000mm wide by 1400mm deep will accommodate most scooters and allow wheelchair users to turn through 180 degrees. It may also be more suitable where there is heavy visitor use. In some listed buildings, a smaller car may be the only option. The minimum size needed to accommodate one wheelchair user and a companion is 1400mm deep by 1100mm wide. If circumstances allow, it should operate as a through lift, with doors on opposite sides, so that the wheelchair user does not have to turn round or reverse on exit. This also applies to short-rise platform lifts.

Whatever the type of lift, requirements for ongoing maintenance and management should not be overlooked, particularly in the case of external lifts that are exposed to the elements.

Certain passenger lifts and most platform lifts avoid the need for expensive and space-consuming overruns and lifts pits. Short-rise platform lifts offer scope for level changes up to 4m if contained within an enclosed lift shaft. The minimum platform size required to accommodate a wheelchair user is 800mm wide by 1250mm where the platform is not enclosed and 900mm wide by 1400mm deep when it is. An enclosed platform 1100mm wide by 1400mm deep will accommodate an accompanied wheelchair user and is the smallest that will allow two doors located at 90 degrees to one another.

#### Llancaiach Fawr

Access from the new stair tower to the first floor of the historic house has been contrived by cutting a new passage through the original wall and carefully adapting the wall panelling to create a door that is almost undetectable when closed.

© Crown copyright (2022), Cadw, Welsh Government





Traditional stair or platform lifts that follow the incline of a stair should only be used where standard passenger or platform lifts cannot be installed. They tend to be unpopular with disabled people and can be undignified or impossible for some people to use. They may also create unacceptable visual intrusion and cannot be fitted to a staircase on an escape route if they constitute a hazard or reduce the width of the stairway to less than the acceptable minimum. They should only be considered as a last resort when it is impossible to accommodate a vertical lift or ramp or where alternative routes are not available.

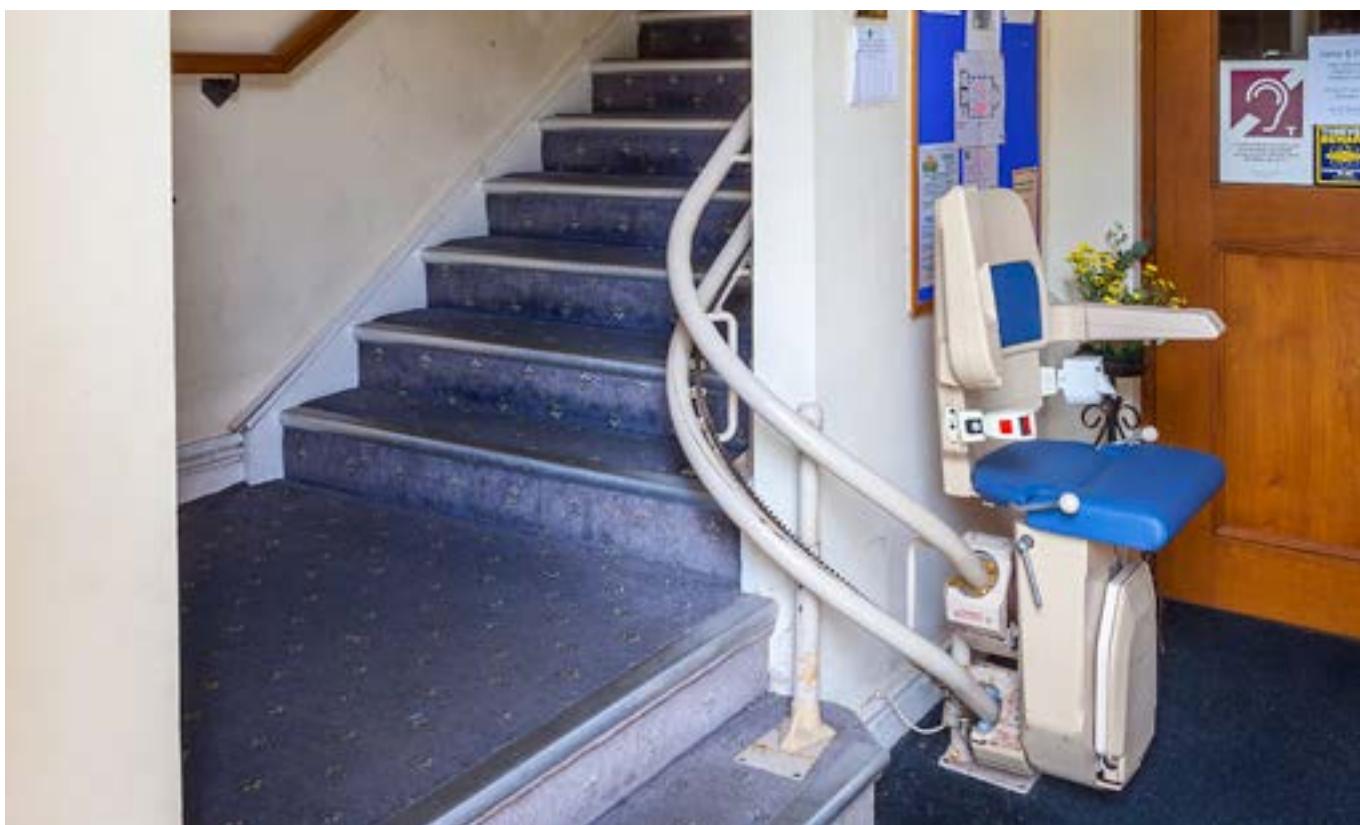
Stair climbers are devices that are attached to wheelchairs to allow them to be transported up or down a flight of stairs. They must be operated by trained staff. They do not serve all types of wheelchair, nor do they resolve the access problems of those who have difficulties with steps. They may also cause embarrassment and can give rise to anxiety because of their perceived lack of safety. The damage they can do to stair treads may also make them unsuitable for use on significant historic staircases. A stair climber may be the only solution to some access problems but should only be considered when there is no other practical option.

### Holyhead library

---

A platform lift provides access to one of the meeting rooms in Holyhead library. Since the original stairs had decayed, the space could be reconfigured for the lift. Contrasting nosing on the new staircase gives good visual contrast.

Isle of Anglesey County Council; © Andy Marshall



### Church in Dolgellau

---

A stairlift was the only viable way of providing inclusive access to the gallery room in the church in Dolgellau. The stair is approached from an internal lobby, minimising the visual intrusion to the historic interior of the church.  
© Crown copyright (2022), Cadw, Welsh Government

#### 4.4.5 Emergency Escape

Ways out must be considered alongside ways in. Responsibility for providing an adequate means of escape for everyone using a building rests with the building management or service providers. Emergency plans should allow for evacuation without reliance on the fire service, and should be drawn up following consultation with the fire officer and disabled users of the building to ensure their needs are taken into account. All staff who may be expected to help with the evacuation of disabled people should receive appropriate training.

The Regulatory Reform (Fire Safety) Order 2005<sup>43</sup> sets out requirements for fire safety and is supported by a number of supplementary guides including *Fire Safety Risk Assessment: Means of Escape for Disabled People*.<sup>44</sup> Guidance is also given in BS 9999: 2017 *Fire Safety in the Design, Management and Use of Buildings – Code of Practice* and in *Expert Commentary on BS 9999:2017. Fire Safety in the Design, Management and Use of Buildings – Code of Practice*.<sup>45</sup>

Disabled people may be able to evacuate themselves from ground-floor accommodation but need assistance with escape from higher or lower floor levels. It may be necessary to provide fire-protected places of refuge adjacent to staircases where people can safely wait for assistance. An evacuation lift is the preferred form of escape and increasingly used as an alternative to carrying wheelchair users down the stairs. Guidance on evacuation lifts is given in BS 9999.

Emergency evacuation plans should be sufficiently flexible to meet the needs of disabled visitors whose specific requirements cannot be identified in advance. Separate plans for disabled employees can be tailored to their particular needs and the known availability of assistance.

## 4.5

### Lighting, Signs and Information

---

#### 4.5.1 Lighting

Good lighting allows people to move easily and safely into and around buildings. Effectively used, it can make obstacles appear more obvious and provide guidance along routes.

Lighting should avoid glare, pools of bright light and areas of deep shadow. Interior lighting schemes may need to be supplemented by sensitively positioned additional fittings to ensure that appropriate levels of illumination are achieved, particularly where there are stairs or changes in level. For example, window blinds can be a useful method of eliminating glare or confusing shadows at certain times of the day.

Sudden changes in light levels should be avoided, and areas of transition from bright to dimly lit space should be created where possible. It can be helpful to provide a place to rest or pause and become accustomed to the lower levels of lighting. While high-contrast lighting schemes that enhance the dramatic effect of a building or space are becoming increasingly common, it is usually possible to ensure that lighting levels are more consistent in those areas where safety may be an issue.

#### 4.5.2 Signs

Signs should be simple, short, easily understood and located where they will be well lit and clearly visible. Where bilingual signage is required for Welsh public buildings, careful consideration should be given to its design and presentation to ensure clarity, legibility and the equal treatment of the Welsh and English languages. Exterior signs need to identify the accessible entrance if this is not also the main entrance. Signs can also indicate distances to key features or areas, the presence and gradient of inclines, and how assistance may be obtained.

Clear and easily visible signs designed to a consistent style help everyone, for example, people who are deaf or hearing impaired may be reluctant to ask for directions in case they are unable to hear or decipher the response.

Signs to facilities specifically for disabled people should use the international symbol for access. Elsewhere, universally recognised public information symbols should replace text where possible. Any other symbols should be used with text.

Colour contrast and large image size are strong features of the signage for the toilets in Holyhead library. The library is Anglesey's first publicly accessible building to provide a changing places toilet to meet the needs of profoundly disabled people. Isle of Anglesey County Council; © Andy Marshall



In general, the signboard should contrast with its background and the lettering should contrast with the signboard. Lower-case lettering with opening capitals is generally easier to read than all capitals. The size of the lettering also needs to be appropriate for the distance from which it will be viewed. The sign itself should be at a height that allows it to be seen in crowded areas or where queues are likely. Braille and embossed information may be incorporated in signs in a historic interior, provided it is done with sensitivity, although it will always be most effective as part of an integrated communication scheme. Tactile signs are only useful if placed where they can be easily reached.

Wherever signs are to be positioned, careful consideration needs to be given to the way they are fixed and the impact they will have on the character of the space to which they are being added. Free-standing signs may sometimes be more appropriate than permanently mounted ones, for example, when events are taking place.

Complementary audible information may be helpful to supplement visual and tactile signs.

### 4.5.3 Information

Comprehensive information about access, itself in accessible formats, is often most usefully provided in advance of a visit. An access guide can be sent out as a leaflet or provided on a website to allow people to plan their visit. As well as explaining how the building can be reached by public transport it will describe the parking facilities and access arrangements in and around the building, highlighting any access restrictions and alternative provisions that have been made.

All staff, and especially those who deal with the public, should be familiar with the requirements of disabled people, and with the facilities available to them. Information and training that encourages people to think about how they might manage their activities to be more inclusive is an important starting point. Training of this kind requires a strategic commitment on the part of any organisation and is particularly effective when it is specifically targeted towards each person's role.



## 4.6

### Landscape and Settings

---

Cadw recommends Historic England's guide **Easy Access to Historic Landscapes**<sup>46</sup> to help property owners and managers make their historic landscapes more accessible to all visitors. It provides guidance on achieving a balance between access and conservation, and gives examples of good practice.

*Manual for Streets*<sup>47</sup> sets out principles of good practice for street management — such as reducing clutter, coordinating design and reinforcing local character.

Access to a listed building and its surroundings, or to wider historic landscapes, should always be considered from the point of arrival, whether by foot, car or public transport. Many historic paths or drives are made of cobble or sett paving, riven stone slabs or gravel, all of which can represent a barrier to access. These materials are nonetheless often an integral part of the significance and character of the landscape.

#### Community Hub, Tredegar House, Newport

---

The National Trust have turned the Old Laundry building at Tredegar House, Newport into a community hub. Inside, there is an accessible training kitchen and social area, while outside, a community garden includes a tactile sensory garden and raised beds for wheelchair users. Reproduced by kind permission of the National Trust

© Crown copyright (2022), Cadw, Welsh Government



## Brewery Courtyard at Tredegar House, Newport.

A flat-surfaced path provides easy access across the cobbled Brewery Courtyard at Tredegar House, Newport. Reproduced by kind permission of the National Trust © Crown copyright (2022), Cadw, Welsh Government



As with listed buildings, easy access to gardens and landscapes is best achieved by understanding their significance and the needs of users, thereby balancing the needs of access and conservation. Examples of adjustments that could be considered and evaluated include:

- replacing existing gravel surfaces with self-binding gravel to provide a firmer surface
- relaying stone setts with tighter joints or pointing them to form a less recessed joint
- incorporating a level route within an area which has an uneven surface
- introducing alternative routes through a park or to a building, and adding appropriate signs
- introducing alternative routes which give access to certain key features and views within the landscape, while acknowledging that it may not be possible to access all areas
- using interpretation or multimedia devices to provide alternative access to those areas that will remain physically inaccessible
- taking full advantage of the sensory qualities of all gardens and landscapes, and of seasonal changes
- providing handrails, powered mobility vehicles and frequent resting places to maximise access for as many people as possible
- use of trained staff and guided tours as an alternative to making physical changes.

### 4.7 Street Furniture and Seating

Service providers should think carefully about the design, location and justification for street furniture such as interpretation panels, bollards, cycle racks, free-standing signs, lamp posts and waste bins. These can become obstacles when set on pedestrian routes. Grouping items together can make them more easily visible and thus less of a hazard.

Benches and internal seating should offer a range of heights and a choice between those with and without backs and armrests. There should also be space for a wheelchair user to pull up next to a seated companion. Tables, where they are provided, should be wheelchair accessible. The creation of spaces for wheelchair users needs to be carefully considered so as to encourage a properly inclusive and welcoming environment.

The local planning authority should be able to advise on any proposals involving design and access for a listed building.

# Further Information

---

## Legislation

**Ancient Monuments and Archaeological Areas Act 1979**

[www.legislation.gov.uk/ukpga/1979/46/contents](http://www.legislation.gov.uk/ukpga/1979/46/contents)

**Equality Act 2010**

[www.legislation.gov.uk/ukpga/2010/15/contents](http://www.legislation.gov.uk/ukpga/2010/15/contents)

**The Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011**

[www.legislation.gov.uk/wsi/2011/1064/contents/made](http://www.legislation.gov.uk/wsi/2011/1064/contents/made)

**Planning (Listed Buildings and Conservation Areas) Act 1990**

[www.legislation.gov.uk/ukpga/1990/9/contents](http://www.legislation.gov.uk/ukpga/1990/9/contents)

**Special Educational Needs and Disability Act 2001**

[www.legislation.gov.uk/ukpga/2001/10](http://www.legislation.gov.uk/ukpga/2001/10)

**The Building Regulations 2010**

[www.legislation.gov.uk/uksi/2010/2214/contents/made](http://www.legislation.gov.uk/uksi/2010/2214/contents/made)

**The Building (Amendment) (Wales) Regulations 2014**

[www.legislation.gov.uk/wsi/2014/110/contents/made](http://www.legislation.gov.uk/wsi/2014/110/contents/made)

**Well-being of Future Generations (Wales) Act 2015**

[www.legislation.gov.uk/anaw/2015/2/contents/enacted](http://www.legislation.gov.uk/anaw/2015/2/contents/enacted)

**Town and Country Planning (Development Management Procedure) (Wales) Order 2012, article 7**

[www.legislation.gov.uk/wsi/2012/801/contents/made](http://www.legislation.gov.uk/wsi/2012/801/contents/made)

## Official Guidance and Policy Documents

**Approved Document M: Access to and Use of Buildings, 2004 edition with 2010 amendments for use in Wales**

[gov.wales/sites/default/files/publications/2019-05/building-regulations-guidance-part-m-access-to-and-use-of-buildings.pdf](http://gov.wales/sites/default/files/publications/2019-05/building-regulations-guidance-part-m-access-to-and-use-of-buildings.pdf)

**Amendments to Approved Document M: Access to and Use of Buildings, 2013 edition for use in Wales**

[gov.wales/building-regulations-guidance-amendments-approved-documents-september-2013](http://gov.wales/building-regulations-guidance-amendments-approved-documents-september-2013)

**BS 8300-1:2018. Design of an Accessible and Inclusive Built Environment. Part 1: External Environment — Code of Practice, British Standards Institute, 2018**  
[www.bsigroup.co.uk](http://www.bsigroup.co.uk)

**BS 8300-2:2018. Design of an Accessible and Inclusive Built Environment. Part 2: Buildings — Code of Practice, British Standards Institute, 2018**  
[www.bsigroup.co.uk](http://www.bsigroup.co.uk)

**BS 9999:2017. Fire Safety in the Design, Management and Use of Buildings — Code of Practice, British Standards Institute, 2017**  
[www.bsigroup.co.uk](http://www.bsigroup.co.uk)

**Equality Act 2010, Code of Practice: Employment Statutory Code of Practice, Equality and Human Rights Commission, 2015**  
[www.equalityhumanrights.com/en/publication-download/employment-statutory-code-practice](http://www.equalityhumanrights.com/en/publication-download/employment-statutory-code-practice)

**Equality Act 2010, Code of Practice: Services, Public Functions and Associations Statutory Code of Practice, Equality and Human Rights Commission, 2011**  
[www.equalityhumanrights.com/en/publication-download/services-public-functions-and-associations-statutory-code-practice](http://www.equalityhumanrights.com/en/publication-download/services-public-functions-and-associations-statutory-code-practice)

**Planning Policy Wales, Welsh Government, 2018**  
[gov.wales/planning-policy-wales](http://gov.wales/planning-policy-wales)

**Technical Advice Note 12: Design, Welsh Government, 2016**  
[gov.wales/technical-advice-note-tan-12-design](http://gov.wales/technical-advice-note-tan-12-design)

**Technical Advice Note 24: The Historic Environment, Welsh Government, 2017**  
[gov.wales/technical-advice-note-tan-24-historic-environment](http://gov.wales/technical-advice-note-tan-24-historic-environment)

**United Nations Convention on the Rights of Persons with Disabilities, 2006**  
[www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities.html](http://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities.html)

**Welsh Government Action on Disability: the right to independent living framework and action plan**  
[www.gov.wales/action-disability-right-independent-living-framework-and-action-plan?\\_ga=2.126561229.1965195698.1666604112-1391243792.1663666885](http://www.gov.wales/action-disability-right-independent-living-framework-and-action-plan?_ga=2.126561229.1965195698.1666604112-1391243792.1663666885)



## Best-practice Guidance

**Conservation Plan Guidance, Heritage Lottery Fund, 2012**

[www.heritagefund.org.uk/publications/conservation-planning-guidance](http://www.heritagefund.org.uk/publications/conservation-planning-guidance)

**Conservation Principles for the Sustainable Management of the Historic Environment in Wales, Cadw, Welsh Assembly Government, 2011**

[cadw.gov.wales/historicenvironment/conservation/conservationprinciples/?lang=en](http://cadw.gov.wales/historicenvironment/conservation/conservationprinciples/?lang=en)

**Design and Access Statements in Wales: Why, What and How, Welsh Government, 2017**

[gov.wales/planning-applications-guidance-design-and-access-statements-das](http://gov.wales/planning-applications-guidance-design-and-access-statements-das)

**Easy Access to Historic Landscapes Historic England, 2015**

[historicengland.org.uk/images-books/publications/easy-access-historic-landscapes/](http://historicengland.org.uk/images-books/publications/easy-access-historic-landscapes/)

**Heritage Impact Assessment in Wales, Welsh Government, Cadw, 2017**

[cadw.gov.wales/historicenvironment/publications/historicbuildings/?lang=en](http://cadw.gov.wales/historicenvironment/publications/historicbuildings/?lang=en)

**Inclusion, National Lottery Heritage Fund, n.d.**

[www.heritagefund.org.uk/publications/inclusion](http://www.heritagefund.org.uk/publications/inclusion)

**Inclusive Design in the Built Environment: Who Do we Design For? Handbook to accompany training delivered on behalf of the Welsh Government by Sandra Manley, March/April 2016**

[dcfw.org/inclusive-design-in-the-built-environment/](http://dcfw.org/inclusive-design-in-the-built-environment/)

**Managing Change to Listed Buildings in Wales, Welsh Government, Cadw, 2017**

[cadw.gov.wales/historicenvironment/publications/historicbuildings/?lang=en](http://cadw.gov.wales/historicenvironment/publications/historicbuildings/?lang=en)

**Managing Scheduled Monuments in Wales, Welsh Government, Cadw, 2018**

[cadw.gov.wales/historicenvironment/publications/scheduledmonuments/?lang=en](http://cadw.gov.wales/historicenvironment/publications/scheduledmonuments/?lang=en)

**Manual for Streets, Department of Transport, 2007**

[www.gov.uk/government/publications/manual-for-streets](http://www.gov.uk/government/publications/manual-for-streets)

**Manual for Streets 2, Department of Transport, 2010**

[www.gov.uk/government/publications/manual-for-streets-2](http://www.gov.uk/government/publications/manual-for-streets-2)

## General Reading

Barker, Peter and Fraser June, *Sign Design Guide – A Guide to Inclusive Signage*, JMU Access Partnership and Sign Design Society, 2000.

Cave, Adrian, *Making Existing Buildings Accessible: Museums and Art Galleries*. RIBA, 2007.

*Practical Building Conservation: Conservation Basics*. English Heritage, Routledge, 2013.

Penton, John, *Widening the Eye of the Needle: Access to Church Buildings for People with Disabilities* (3rd rev edn), Church House Publishing, 2008.

Sawyer, Ann and Bright, Keith, *The Access Manual: Auditing and Managing Inclusive Built Environments* (2nd edn) Blackwell, 2008.

## Historical Information

**Archives Wales** — an online catalogue that allows you to search information in more than 7,000 collections of historical records in the holdings of the 21 archives in Wales. [www.archiveswales.org.uk](http://www.archiveswales.org.uk)

**Archwilio** — provides online public access to the historic environment records for each local authority area in Wales. Archwilio is maintained and supported with further information held by the Welsh archaeological trusts. [www.archwilio.org.uk](http://www.archwilio.org.uk)

**Coflein** — the online catalogue for the National Monuments Record of Wales, the national collection of information about the historic environment of Wales. [www.coflein.gov.uk](http://www.coflein.gov.uk)

**Cof Cymru** — Cadw's online record of the national historic assets of Wales, which includes listed buildings, scheduled monuments, protected wrecks, World Heritage Sites and registered historic landscapes. Registered historic parks and gardens will be added to Cof Cymru during 2019. [cadw.gov.wales/historicenvironment/recordsv1/cof-cymru/?lang=en](http://cadw.gov.wales/historicenvironment/recordsv1/cof-cymru/?lang=en)

**Cynefin** — an online resource to research Welsh tithe maps and their indexes. [www.places.library.wales/](http://www.places.library.wales/)

**Historic Wales** — an online gateway to national and regional historic environment records. [www.historicwales.gov.uk](http://www.historicwales.gov.uk)

**List of Historic Place Names of Wales** — records the various forms and spellings used for the names of topographical features, communities, thoroughfares, structures and other aspects of the landscape recorded in sources that predate the First World War. [www.historicplacenames.rcahmw.gov.uk/](http://www.historicplacenames.rcahmw.gov.uk/)

**The National Library of Wales**  
[www.library.wales/](http://www.library.wales/)

# Contacts

---

## **Cadw**

Welsh Government  
Plas Carew  
Unit 5/7 Cefn Coed  
Parc Nantgarw  
Cardiff  
CF15 7QQ

gov.wales/cadw  
03000 256000

Local planning authorities' access, conservation and planning officers can be contacted via the relevant local authority websites.

## **Access Organisations**

**Accessible Countryside for Everyone**  
[www.accessiblecountryside.org.uk](http://www.accessiblecountryside.org.uk)

**Action on Hearing Loss**  
[www.actiononhearingloss.org.uk](http://www.actiononhearingloss.org.uk)  
0808 808 0123

**Age UK**  
[www.ageuk.org.uk](http://www.ageuk.org.uk)  
0800 055 6112

**Centre for Accessible Environments**  
[www.cae.org.uk](http://www.cae.org.uk)  
020 7822 8232

**Disability Wales**  
[www.disabilitywales.org/](http://www.disabilitywales.org/)  
029 2088 7325

**Equality and Human Rights Commission (EHRC)**  
**Advice and guidance for Wales**  
[www.equalityhumanrights.com/en/commission-wales](http://www.equalityhumanrights.com/en/commission-wales)  
029 2044 7710

**Learning Disability Wales**  
[www.ldw.org.uk](http://www.ldw.org.uk)  
029 2068 1160

**Mencap Cymru**  
[wales.mencap.org.uk/?gclid=EAlaIqobChMik5KB05j22wIVq53tCh3R5QoCEAAAYASAAEgKvuPD\\_BwE](http://wales.mencap.org.uk/?gclid=EAlaIqobChMik5KB05j22wIVq53tCh3R5QoCEAAAYASAAEgKvuPD_BwE)  
0808 808 1111

**Mind Cymru**  
[www.mind.org.uk/about-us/mind-cymru](http://www.mind.org.uk/about-us/mind-cymru)  
0300 123 3393

**National Autistic Society**  
[www.autism.org.uk](http://www.autism.org.uk)  
020 7833 2299

**National Register of Access Consultants**  
[www.nrac.org.uk](http://www.nrac.org.uk)  
020 7399 7417

**Royal National Institute of Blind People Cymru**  
[www.rnib.org.uk/wales-cymru-1](http://www.rnib.org.uk/wales-cymru-1)  
029 2082 8500

**Scope**  
[www.scope.org.uk](http://www.scope.org.uk)  
0808 800 3333

**Sensory Trust**  
[www.sensorytrust.org.uk](http://www.sensorytrust.org.uk)  
01726 222900

**Thrive**  
[www.thrive.org.uk](http://www.thrive.org.uk)  
0118 988 5688

**Web Accessibility Initiative**  
[www.w3.org/wai](http://www.w3.org/wai)

## Amenity Societies

**Ancient Monuments Society**  
[www.ancientmonumentsociety.org.uk](http://www.ancientmonumentsociety.org.uk)  
020 7236 3934

**Council for British Archaeology**  
[www.archaeologyuk.org](http://www.archaeologyuk.org)  
01904 671 417

**The Gardens Trust**  
[www.thegardenstrust.org](http://www.thegardenstrust.org)  
020 7608 2409

**The Georgian Group**  
[www.georgiangroup.org.uk](http://www.georgiangroup.org.uk)  
020 7529 8920

**The Society for the Protection of Ancient Buildings (SPAB)**  
[www.spab.org.uk](http://www.spab.org.uk)  
020 7377 1644

**The Twentieth Century Society**  
[www.c20society.org.uk](http://www.c20society.org.uk)  
020 7250 385

**Theatres Trust**  
[www.theatretrust.org.uk](http://www.theatretrust.org.uk)  
020 7836 8591

**The Victorian Society**  
[www.victoriansociety.org.uk](http://www.victoriansociety.org.uk)  
020 8994 1019

**Welsh Historic Gardens Trust**  
[whgt.wales](http://whgt.wales)  
01558 668 485

## Religious Denominations

**Baptist Union of Great Britain**  
[www.baptist.org.uk](http://www.baptist.org.uk)  
01235 517700

**Baptist Union of Wales**  
[www.buw.org.uk](http://www.buw.org.uk)  
01267 245660

**The Church of England**  
[www.churchofengland.org/resources/churchcare/advice-and-guidance-church-buildings/accessibility](http://www.churchofengland.org/resources/churchcare/advice-and-guidance-church-buildings/accessibility)  
0207 898 1863

**General Assembly of Unitarian and Free Christian Churches**  
[www.unitarian.org.uk](http://www.unitarian.org.uk)  
020 7240 2384

**Jewish Heritage UK**  
[www.jewish-heritage-uk.org](http://www.jewish-heritage-uk.org)  
161 238 8621

**Religious Society of Friends (Quakers)**  
[www.quaker.org.uk](http://www.quaker.org.uk)  
020 7633 1000

**Representative Body of the Church in Wales**  
[www.churchinwales.org.uk](http://www.churchinwales.org.uk)  
029 2034 8200

**The Catholic Church in England and Wales**  
[www.cbcew.org.uk/care-of-churches](http://www.cbcew.org.uk/care-of-churches)  
020 7630 8220

**The Methodist Church**  
[www.methodist.org.uk](http://www.methodist.org.uk)  
0161 235 6739 (conservation officer)

**The Methodist Church in Wales**  
[www.methodistwales.org.uk](http://www.methodistwales.org.uk)  
029 2076 1515

**Through the Roof**  
[www.throughtheroof.org](http://www.throughtheroof.org)

**The United Reformed Church**  
[www.urc.org.uk](http://www.urc.org.uk)  
020 7916 202049



## Other Bodies

**Association of Local Government Archaeological Officers UK**  
[www.algao.org.uk](http://www.algao.org.uk)  
01975 564071

**Design Commission for Wales**  
[www.dcfw.org](http://www.dcfw.org)  
029 2045 1964

**National Lottery Heritage Fund**  
[www.heritagefund.org.uk/](http://www.heritagefund.org.uk/)  
020 7591 6000

**IHBC (Institute of Historic Building Conservation)**  
[www.ihbc.org.uk](http://www.ihbc.org.uk)  
01747 873133

**National Trust**  
[www.nationaltrust.org.uk](http://www.nationaltrust.org.uk)  
01793 81740050

**RIBA (Royal Institute of British Architects)**  
[www.architecture.com](http://www.architecture.com)

**RICS (Royal Institution of Chartered Surveyors)**  
[www.rics.org/uk](http://www.rics.org/uk)

**Royal Commission on the Ancient and Historical Monuments of Wales**  
[www.rcahmw.gov.uk](http://www.rcahmw.gov.uk)  
01970 621200

## The Welsh Archaeological Trusts

**Clwyd-Powys Archaeological Trust**  
41 Broad Street, Welshpool SY21 7RR  
01938 553670  
[trust@cpat.org.uk](mailto:trust@cpat.org.uk)  
[www.cpat.org.uk](http://www.cpat.org.uk)

**Dyfed Archaeological Trust**  
Corner House, 6 Carmarthen Street, Llandeilo SA19 6AE  
01558 823121  
[info@dyfedarchaeology.org.uk](mailto:info@dyfedarchaeology.org.uk)  
[www.dyfedarchaeology.org.uk](http://www.dyfedarchaeology.org.uk)

**Glamorgan-Gwent Archaeological Trust**  
Heathfield House, Heathfield, Swansea SA1 6EL  
01792 655208  
[enquiries@ggat.org.uk](mailto:enquiries@ggat.org.uk)  
[www.ggat.org.uk](http://www.ggat.org.uk)

**Gwynedd Archaeological Trust**  
Craig Beuno, Garth Road, Bangor LL57 2RT  
01248 352535  
[gat@heneb.co.uk](mailto:gat@heneb.co.uk)  
[www.heneb.co.uk](http://www.heneb.co.uk)

## Links from this document

Where this document contains links to other sites and resources provided by third parties, these links are provided for your information only. Linking should not be taken as endorsement of any kind. Cadw has no control over the content or availability of linked pages and accepts no responsibility for them or for any loss or damage that may arise from your use of them.

**Cadw**  
Welsh Government  
Plas Carew  
Unit 5/7 Cefn Coed  
Parc Nantgarw  
Cardiff  
CF15 7QQ

03000 256000

[cadw@gov.wales](mailto:cadw@gov.wales)

[cadw.gov.wales](http://cadw.gov.wales)

Cadw is the Welsh Government's historic environment service working for an accessible and well-protected historic environment for Wales.

# Endnotes

---

- 1 *Conservation Principles for the Sustainable Management of the Historic Environment in Wales*, Cadw, Welsh Assembly Government, 2011 [www.cadw.gov.wales/historicenvironment/conservation/conservationprinciples/?lang=en](http://www.cadw.gov.wales/historicenvironment/conservation/conservationprinciples/?lang=en)
- 2 *Approved Document M: Access to and Use of Buildings*, 2004 edition with 2010 amendments for use in Wales [www.gov.wales/sites/default/files/publications/2019-05/building-regulations-guidance-part-m-access-to-and-use-of-buildings.pdf](http://www.gov.wales/sites/default/files/publications/2019-05/building-regulations-guidance-part-m-access-to-and-use-of-buildings.pdf)  
*Amendments to Approved Document M: Access to and Use of Buildings*, 2013 edition for use in Wales
- 3 BS 8300-1:2018. *Design of an Accessible and Inclusive Built Environment. Part 1: External Environment — Code of Practice*, British Standards Institute, 2018. BS 8300-2:2018. *Design of an Accessible and Inclusive Built Environment. Part 2: Buildings — Code of Practice*, British Standards Institute, 2018
- 4 *Technical Advice Note 12: Design*, Welsh Government, 2016, [www.gov.wales/technical-advice-note-tan-12-design](http://www.gov.wales/technical-advice-note-tan-12-design)
- 5 Design Commission for Wales; *Inclusive Design in the Built Environment: Who Do we Design For?* Handbook to accompany training delivered on behalf of the Welsh Government by Sandra Manley, March/April 2016 [www.dcfw.org/inclusive-design-in-the-built-environment/](http://www.dcfw.org/inclusive-design-in-the-built-environment/)
- 6 *Planning Policy Wales*, Welsh Government, [www.gov.wales/planning-policy-wales](http://www.gov.wales/planning-policy-wales)
- 7 *Technical Advice Note 24: The Historic Environment*, Welsh Government, 2017 [www.gov.wales/technical-advice-note-tan-24-historic-environment](http://www.gov.wales/technical-advice-note-tan-24-historic-environment)
- 8 *Easy Access to Historic Buildings*, Historic England, 2015 [www.historicengland.org.uk/images-books/publications/easy-access-to-historic-buildings/](http://www.historicengland.org.uk/images-books/publications/easy-access-to-historic-buildings/)  
The original material is ©Historic England 2015. Any reproduction of the original Work requires Historic England's prior written permission and any reproduction of this adaptation of that Work requires the express written permission of both Historic England and Cadw. All rights reserved. Historic England does not accept liability for loss or damage arising from the use of the information contained in this work.
- 9 Equality Act 2010, *Services, Public Functions and Associations: Statutory Code of Practice*, Equality and Human Rights Commission, 2011, p. 90, 7.4 [www.equalityhumanrights.com/en/publication-download/services-public-functions-and-associations-statutory-code-practice](http://www.equalityhumanrights.com/en/publication-download/services-public-functions-and-associations-statutory-code-practice)
- 10 Disability Wales, Social Model of Disability, [www.disabilitywales.org/social-model/](http://www.disabilitywales.org/social-model/)
- 11 United Nations Convention on the Rights of Persons with Disabilities [www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities.html](http://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities.html)
- 12 Welsh Government, Strategic Equality Plan Equality Aims, Objectives & Actions 2020-2024 [www.gov.wales/sites/default/files/publications/2020-04/strategic-equality-plan-equality-aims-objectives-actions-2020-2024.pdf](http://www.gov.wales/sites/default/files/publications/2020-04/strategic-equality-plan-equality-aims-objectives-actions-2020-2024.pdf)
- 13 *Conservation Principles for the Sustainable Management of the Historic Environment in Wales*, Cadw, Welsh Assembly Government, 2011 [www.cadw.gov.wales/historicenvironment/conservation/conservationprinciples/?lang=en](http://www.cadw.gov.wales/historicenvironment/conservation/conservationprinciples/?lang=en)
- 14 *Planning Policy Wales*, Welsh Government, [www.gov.wales/planning-policy-wales](http://www.gov.wales/planning-policy-wales)
- 15 Well-being of Future Generations (Wales) Act 2015, [www.legislation.gov.uk/anaw/2015/2/contents/enacted](http://www.legislation.gov.uk/anaw/2015/2/contents/enacted)
- 16 United Nations Convention on the Rights of the Child 1989, [www.unicef.org.uk/what-we-do/un-convention-child-rights/](http://www.unicef.org.uk/what-we-do/un-convention-child-rights/)
- 17 Rights of Children and Young Persons (Wales) Measure 2011, [www.legislation.gov.uk/mwa/2011/2/contents](http://www.legislation.gov.uk/mwa/2011/2/contents)
- 18 Equality Act 2010, [www.legislation.gov.uk/ukpga/2010/15/contents](http://www.legislation.gov.uk/ukpga/2010/15/contents)
- 19 The Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011, [www.legislation.gov.uk/wsi/2011/1064/contents/made](http://www.legislation.gov.uk/wsi/2011/1064/contents/made)
- 20 Equality Act 2010, Part 11, Chapter 1: Public Sector Equality Duty, [www.legislation.gov.uk/ukpga/2010/15/part/11/chapter/1](http://www.legislation.gov.uk/ukpga/2010/15/part/11/chapter/1)
- 21 BS 8300-1:2018. *Design of an Accessible and Inclusive Built Environment. Part 1: External Environment — Code of Practice*, British Standards Institute, 2018. BS 8300-2:2018. *Design of an Accessible and Inclusive Built Environment. Part 2: Buildings — Code of Practice*, British Standards Institute, 2018
- 22 *Approved Document M: Access to and Use of Buildings*, 2004 edition with 2010 amendments for use in Wales [www.gov.wales/sites/default/files/publications/2019-05/building-regulations-guidance-part-m-access-to-and-use-of-buildings.pdf](http://www.gov.wales/sites/default/files/publications/2019-05/building-regulations-guidance-part-m-access-to-and-use-of-buildings.pdf)  
*Amendments to Approved Document M: Access to and Use of Buildings*, 2013 edition for use in Wales
- 23 Equality Act 2010, Part 11, Chapter 1: Public Sector Equality Duty, [www.legislation.gov.uk/ukpga/2010/15/part/11/chapter/1](http://www.legislation.gov.uk/ukpga/2010/15/part/11/chapter/1)
- 24 The Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011, [www.legislation.gov.uk/wsi/2011/1064/contents/made](http://www.legislation.gov.uk/wsi/2011/1064/contents/made)
- 25 Article 7 Town and Country Planning (Development Management Procedure) (Wales) Order 2012/801 [www.legislation.gov.uk/wsi/2012/801/contents/made](http://www.legislation.gov.uk/wsi/2012/801/contents/made)  
as amended by article 9 of the Town and Country Planning (Development Management Procedure) (Wales) Amendment Order 2016 [www.legislation.gov.uk/wsi/2016/59/article/4/made](http://www.legislation.gov.uk/wsi/2016/59/article/4/made)

- 26 Design and Access Statements in Wales, Welsh Government, 2017  
[www.gov.wales/planning-applications-guidance-design-and-access-statements-das](http://www.gov.wales/planning-applications-guidance-design-and-access-statements-das)
- 27 Approved Document M: Access to and Use of Buildings, 2004 edition with 2010 amendments for use in Wales  
[www.gov.wales/sites/default/files/publications/2019-05/building-regulations-guidance-part-m-access-to-and-use-of-buildings.pdf](http://www.gov.wales/sites/default/files/publications/2019-05/building-regulations-guidance-part-m-access-to-and-use-of-buildings.pdf) Amendments to Approved Document M: Access to and Use of Buildings, 2013 edition for use in Wales  
[www.gov.wales/building-regulations-guidance-amendments-approved-documents-september-2013](http://www.gov.wales/building-regulations-guidance-amendments-approved-documents-september-2013)
- 28 BS 8300-1:2018. Design of an Accessible and Inclusive Built Environment. Part 1: External Environment — Code of Practice, British Standards Institute, 2018, BS 8300-2:2018. Design of an Accessible and Inclusive Built Environment. Part 2: Buildings — Code of Practice, British Standards Institute, 2018
- 29 Planning (Listed Buildings and Conservation Areas) Act 1990, [www.legislation.gov.uk/ukpga/1990/9/contents](http://www.legislation.gov.uk/ukpga/1990/9/contents)
- 30 Planning (Listed Buildings and Conservation Areas) (Wales) Regulations 2012  
[www.legislation.gov.uk/wsi/2012/793/contents/made](http://www.legislation.gov.uk/wsi/2012/793/contents/made) as amended by Planning (Listed Buildings and Conservation Areas) (Wales) (Amendment No. 2) Regulations 2017  
[www.legislation.gov.uk/wsi/2017/638/made](http://www.legislation.gov.uk/wsi/2017/638/made)
- 31 Managing Change to Listed Buildings in Wales, Welsh Government, Cadw, 2017  
[www.cadw.gov.wales/advice-support/historic-assets/listed-buildings/managing-change-to-listed-buildings](http://www.cadw.gov.wales/advice-support/historic-assets/listed-buildings/managing-change-to-listed-buildings)
- 32 Heritage Impact Assessment in Wales, Welsh Government, Cadw, 2017  
[www.cadw.gov.wales/advice-support/placemaking/heritage-impact-assessment/heritage-impact-assessment](http://www.cadw.gov.wales/advice-support/placemaking/heritage-impact-assessment/heritage-impact-assessment)
- 33 Ecclesiastical Exemption (Listed Buildings and Conservation Areas) (Wales) Order 2018  
[www.legislation.gov.uk/wsi/2018/1087/contents/made](http://www.legislation.gov.uk/wsi/2018/1087/contents/made)
- 34 Managing Change to Historic Places of Worship in Wales: Ecclesiastical Exemption, Welsh Government, Cadw, 2018  
[www.cadw.gov.wales/advice-support/historic-assets/listed-buildings/historic-places-worship#section-ecclesiastical-exemption](http://www.cadw.gov.wales/advice-support/historic-assets/listed-buildings/historic-places-worship#section-ecclesiastical-exemption)
- 35 Ancient Monuments and Archaeological Areas Act 1979, [www.legislation.gov.uk/ukpga/1979/46/contents](http://www.legislation.gov.uk/ukpga/1979/46/contents)
- 36 Managing Scheduled Monuments in Wales, Welsh Government, Cadw, 2018  
[www.cadw.gov.wales/sites/default/files/2019-05/20181112Managing\\_Scheduled\\_Monuments\\_in\\_Wales\\_ENG.pdf](http://www.cadw.gov.wales/sites/default/files/2019-05/20181112Managing_Scheduled_Monuments_in_Wales_ENG.pdf)
- 37 Managing Change to Registered Historic Parks and Gardens in Wales, Welsh Government, Cadw, 2017  
[www.cadw.gov.wales/historicenvironment/publications/historicparksandgardens/?lang=en](http://www.cadw.gov.wales/historicenvironment/publications/historicparksandgardens/?lang=en)
- 38 National Register of Access Consultants, [www.nrac.org.uk](http://www.nrac.org.uk)
- 39 Equality Act 2010, [www.legislation.gov.uk/ukpga/2010/15/contents](http://www.legislation.gov.uk/ukpga/2010/15/contents)
- 40 Equality Act 2010, Services, Public Functions and Associations: Statutory Code of Practice, Equality and Human Rights Commission, 2011, 7.51–7.63,  
[www.equalityhumanrights.com/en/publication-download/services-public-functions-and-associations-statutory-code-practice](http://www.equalityhumanrights.com/en/publication-download/services-public-functions-and-associations-statutory-code-practice)
- 41 Equality Act 2010, Services, Public Functions and Associations: Statutory Code of Practice, Equality and Human Rights Commission, 2011, 7.80,  
[www.equalityhumanrights.com/en/publication-download/services-public-functions-and-associations-statutory-code-practice](http://www.equalityhumanrights.com/en/publication-download/services-public-functions-and-associations-statutory-code-practice)
- 42 Equality Act 2010, Services, Public Functions and Associations: Statutory Code of Practice, Equality and Human Rights Commission, 2011  
[www.equalityhumanrights.com/en/publication-download/services-public-functions-and-associations-statutory-code-practice](http://www.equalityhumanrights.com/en/publication-download/services-public-functions-and-associations-statutory-code-practice)
- 43 Regulatory Reform (Fire Safety) Order 2005, [www.legislation.gov.uk/uksi/2005/1541/contents/made](http://www.legislation.gov.uk/uksi/2005/1541/contents/made)
- 44 Fire Safety Risk Assessment: Means of Escape for Disabled People, Ministry of Housing, Communities and Local Government, 2007  
[www.gov.uk/government/publications/fire-safety-risk-assessment-means-of-escape-for-disabled-people](http://www.gov.uk/government/publications/fire-safety-risk-assessment-means-of-escape-for-disabled-people)
- 45 BS 9999:2017 Code of Practice for Fire Safety in the Design, Management and Use of Buildings, British Standards Institute, 2017, Expert Commentary on BS 9999:2017 Fire safety in the design, management and use of buildings. Code of Practice, British Standards Institute, 2017
- 46 Easy Access to Historic Landscapes Historic England, 2015  
[www.historicengland.org.uk/images-books/publications/easy-access-historic-landscapes/](http://www.historicengland.org.uk/images-books/publications/easy-access-historic-landscapes/)
- 47 Manual for Streets, Department of Transport, 2007, [www.gov.uk/government/publications/manual-for-streets](http://www.gov.uk/government/publications/manual-for-streets)  
Manual for Streets 2, Department of Transport, 2010, [www.gov.uk/government/publications/manual-for-streets-2](http://www.gov.uk/government/publications/manual-for-streets-2)



## Technical guidance