

University College London (UCL) Bidborough House primary entrance accessibility works – justification statement

Executive summary

This justification statement is to request Camden Council the permission to undertake refurbishment works to upgrade accessibility to the primary entrance to University College London (UCL) Bidborough House, located at 38–50 Bidborough Street, in London.

This document outlines the reasons behind UCL's decision to undertake refurbishment works to the primary entrance to Bidborough House, in addition to explaining the current elements of non-compliance, with respect to Part M of the Building Regulations 2010 and the intents of the Equality Act 2010 and the Public Sector Duty 2011, along with the proposed solutions to address, or mitigate, said non-compliances. The proposed refurbishment works will represent an improvement of the current situation and will enable UCL to make a significant step in meeting current accessibility and anti-discrimination regulations.

1. Introduction

In 2022, UCL decided to make Bidborough House the long-term home for UCL's Central Professional Services, paving the way for almost 2000 staff and 14 departments to be housed under one roof for the first time.

In light of this major transition, the Estates team set out to engage with staff and ensure that any new developments and changes made within and to the building be fit for all staff, present and future by placing accessibility and inclusion at its heart.

As a public body, UCL has a duty to consider the impacts of its actions on groups protected under the Equality Act 2010, in order to meet its obligations under the Public Sector Equality Duty, which are to:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Beginning in November 2022, an accessibility and inclusion at Bidborough House review was carried out over seven weeks. The review took a five-part approach identify opportunities for improvement, inform a ten-year plan for the building and make it a gold standard for inclusion.

The five-part approach consisted of the following steps:

- Research of historical and past issues raised at Bidborough House
- Production of an access audit, on the current state of Bidborough House
- Consultation stage, with relevant staff members based at Bidborough House
- Production of an Equality Impact Assessment to ensure any adverse impacts, of the recommendations contained in the access audit, could be mitigated
- Production of a ten-year plan to improve accessibility and inclusivity within Bidborough House.

Improving the accessibility of the main entrance has been identified as the major priority to be addressed, following the findings from the historical review, the access audit, the extensive consultation process along with the equality impact assessment.

2. Current accessibility and inclusion issues

The section below outlines the current accessibility issues, with regards to the main entrance to Bidborough House, in terms of non-compliance with Part M of the Building Regulations 2010 and the intent of the Equality Act 2010 and the Public Sector Equality Duty 2011.

Ramp:

- Insufficient clear width of the ramp (currently 900mm), not achieving the required 1500mm clear surface width (see dimension highlighted in red, within Figure 1 in Appendix A).
- Lack of sufficiently deep landing at the top of the ramp (currently 1220mm), as the top landing should have a clear depth of least 1500mm or be at least as wide as the ramp (see Figure 2 in Appendix A).
- Lack of sufficiently deep landing at the bottom of the ramp (currently 1300mm), as the bottom landing should have a clear depth of least 1500mm or be at least as wide as the ramp (see Figure 3 in Appendix A).
- No sufficient visual contrast (i.e. at least 30 Light Reflectance Value points of difference) between the landings and the going of the ramp; in addition, the intersection between the top landing of the ramp and the flooring material in front of the entrance to Bidborough House is paved in such a way that it can be mistaken as a step (see Figure 4 and Figure 5 in Appendix A).
- Lack of sufficient visual contrast between the handrails and the background these are seen against (see Figure 6 in Appendix A).
- Handrailing not being provided with a circular or oval profile, as Required by Approved Document M vol 2 2015 (see Figure 7 in Appendix A).
- Handrails, both at the top and at the bottom of the ramp, not being provided with the required 300mm long horizontal extension (see Figure 7 in Appendix A).
- Lack of evenly distributed artificial lighting along the ramp, creating both visual and personal safety discomfort (see Figure 8 in Appendix A).

Stair:

- Unsafe stair nosings, due to wear (see Figure 9 in Appendix A).
- Main entrance doors opening onto the landing, obstructing the required 1500x1500mm clear landing that is to be provided in front of the doors.
- Lack of sufficient visual contrast (i.e. at least 30 Light Reflectance Value points of difference) between the handrails and the background these are seen against (see Figure 10 in Appendix A).
- Handrailing not being provided with a circular or oval profile, as Required by Approved Document M vol 2 2015 (see Figure 11 in Appendix A).
- Handrails, both at the top and at the bottom of the stair, not being provided with the required 300mm long horizontal extension (see Figure 12 in Appendix A).
- Due to the existing gradient of the pavement, the bottom step of the stair is slightly tapered, resulting in the risk of trips and falls (see Figure 13 in Appendix A).

Doors:

- The power-operated accessible door is not available to use, during out-of-office hours (or in all instances in which the receptionist is not present at their desk) due to safety risks associated with tailgating.
- The two doors located aside the power-operated accessible door are manually operated and require more than the maximum permissible 30N to be opened.
- There is no entry-phone currently provided to this entrance, leaving disabled people without assistance, at all times in which the receptionist is not at their desk, or during out of office hours.
- The secondary entrance presents similar accessibility issues, as per the main entrance meaning that, due to UCL's current out-of-hours policy, disabled people are prevented from entering and exiting the building outside of standard working hours, consequently resulting in a breach of the Public Sector Equality Duty.

3. Proposed solutions

In order to rectify the current accessibility and inclusivity issues of the main entrance to Bidborough House, noted in section 2, UCL are proposing the following alterations:

- Ramp:
 - Widening of the clear surface width to 1500mm (from the current 900mm) or, at least as far as practicable within the boundary line (as shown in Figure 1 in Appendix A).
 - Widening the top landing of the ramp to 1500mm (from the current 1220mm) or, at least, as wide as the revised ramp width.
 - Resurfacing the ramp going and both the landing at the bottom and at the top of the ramp, in order to provide sufficient visual contrast between these two

adjoining surfaces (i.e. at least 30 Light Reflectance Value points of difference).

- Extending the handrails 300mm horizontally both at the top and at the bottom of the ramp. Handrails to be terminated in a way that reduces the risk of clothing being caught, and that can be detected by a person walking with a cane.
- Positioning the top of the handrails at a height of 900mm to 1000mm above the surface of the ramp, and between 900mm and 1100mm from the landing.
- Providing a lower handrail at 600mm to cater for people of shorter stature.
- Providing visually contrasting handrails (i.e. at least 30 Light Reflectance Value points of difference with the background these are seen against).
- Providing circular handrails with a diameter of between 32 mm and 50 mm, and a clearance of between 50 mm and 75 mm between the adjacent wall / balustrade surface.
- Integrating artificial lighting along the whole development of the ramp in order for it to be evenly distributed, with an illuminance at ramp and landing level of at least 100 lux.
- Stair:
 - Re-installing the currently torn nosings with new slip resistant, continuous nosings that extends 50-65mm width from the front edge of the tread to and 30-55mm from the top of the rise, ensuring a visual contrast of at least 30 LRV points of difference with the remainder of the stair.
 - Extending handrails 300mm horizontally, on the top and one the bottom of the stair. Handrails to be terminated in a way that reduces the risk of clothing being caught, and that can be detected by a person walking with a cane (coordination needed, with Camden Council, to determine whether the 300mm horizontal handrail extension can be provided to the bottom of the stair as this would encroach with the public pavement).
 - Positioning the top of the handrails at a height of 900mm to 1000mm above the pitch line of the stair, and between 900mm and 1100mm from the landing.
 - Providing a lower handrail at 600mm to cater for children and people of shorter stature.
 - Providing visually contrasting handrails (i.e. at least 30 Light Reflectance Value points of difference with the background these are seen against).
 - Providing circular handrails with a diameter of between 32 mm and 50 mm, and a clearance of between 50 mm and 75 mm between the adjacent wall / balustrade surface.
 - If feasible, providing tactile warning surface indicators, to the top and bottom of the stair, as per Diagram 4 of AD M vol 2 2015 (coordination needed, with Camden Council, to determine whether the tactile warning surface indicators can be provided to the bottom of the stair as this would encroach with the public pavement).

- If feasible, adjust the gradient of the pavement in order to remove the tapered tread, at the bottom of the stair.
- Entrance doors:
 - Providing an entry-phone, both to the power-operated pass-door and to the adjacent swing doors, to request assistance if needed.
 - Changing the opening direction of the accessible pass door, to swing inwards.
 - Replacing two doors adjacent the accessible pass door with new doors that don't require more than 30N to be opened, and that also allow the possibility to swing both inwards and outwards.

4. Conclusions

This justification statement is to request Camden Council permission to undertake refurbishment works to upgrade accessibility to the primary entrance to UCL Bidborough House, located at 38–50 Bidborough Street, in London.

The proposed refurbishment works have derived from consultations with UCL staff, and following an access audit undertaken in December 2022, and are outlined in section 3 of this document. These will represent an improvement of the current situation and will enable UCL to make a significant step in meeting Part M of the Building Regulations 2010, the intent of the Equality Act 2010 and of the Public Sector Equality Duty 2011.

Appendix A: photographic evidence of current accessibility non-compliances

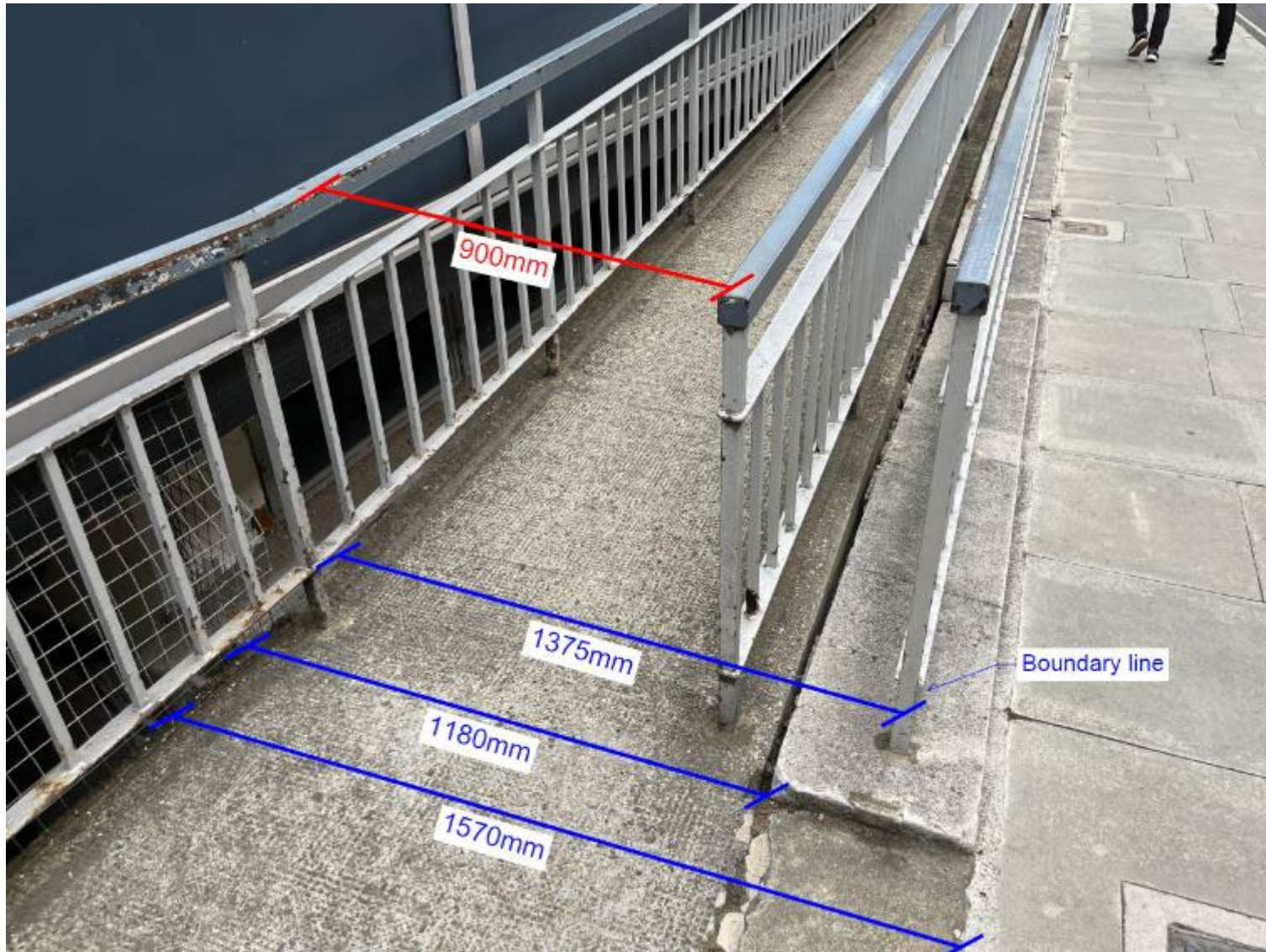


Figure 1. Indication of the current clear width of the ramp (in red) at the bottom of the ramp, and indication of the project boundary line.



Figure 2. Indication of the current clear width of the top landing of the ramp (in red).



Figure 3. Indication of the current clear width of the bottom landing of the ramp (in red).



Figure 4. Photo showing lack of sufficient visual contrast between the ramp going and the bottom landing.



Figure 5. Photo showing lack of sufficient visual contrast between the ramp going and the top landing, in addition of strong visual contrast in the intersection between top ramp landing and entrance.



Figure 6. Photo showing lack of sufficient visual contrast between handrails and background these are seen against.



Figure 7. Photo showing lack of circular or oval handrailing profile, and lack of 300mm long handrail horizontal extension.



Figure 8. Photo showing the lack of sufficient illumination, along the ramp, during nighttime conditions.



Figure 9. Detail of the stair nosing deterioration.



Figure 10. Photo showing lack of sufficient visual contrast between handrails and background these are seen against.

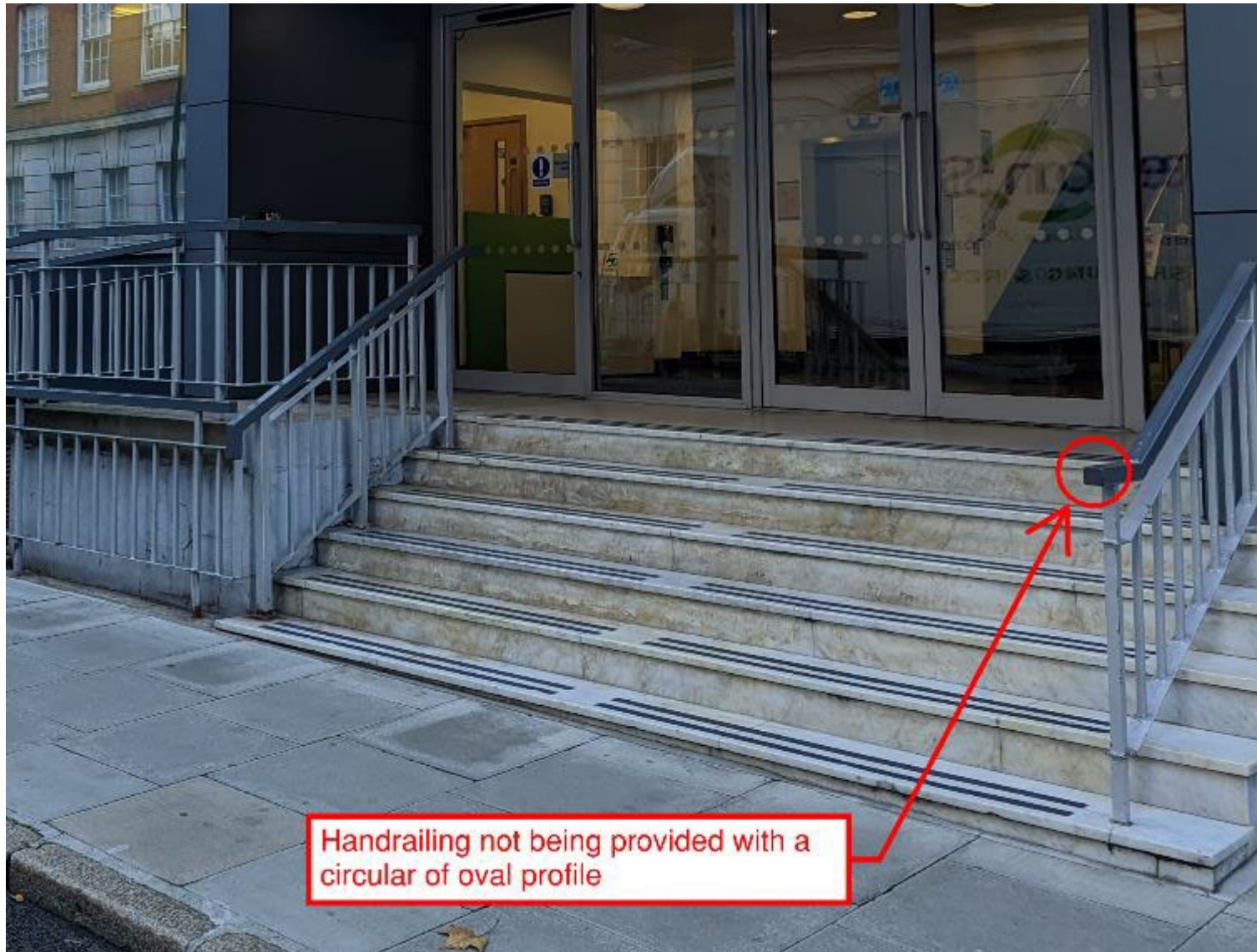


Figure 11. Photo showing stair handrailing profile.



Figure 12. Photo showing lack of 300mm long horizontal extension to the stair handrails.



Figure 13. Photo showing the tapered tread, at the bottom of the main entrance.