



SAVILLE THEATRE

135 SHAFTESBURY AVENUE

ACCESSIBILITY STATEMENT

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Glossary

Term	Definition
affl	Above finish floor level
AD K	Approved Document K of the Building Regulations, Protection from fallings, collision and impact, 2013
AD M	Approved Document M of the Building Regulations Volume 2: Buildings other than dwellings, 2015
Arts Council	Building Access: A good practice guide for arts and cultural organisations
BS 8300-1	BS 8300-1:2018 Design of an accessible and inclusive built environment. Part 1: External environment - Code of practice
BS 8300-2	BS 8300-2:2018 Design of an accessible and inclusive built environment. Part 2: Buildings - Code of practice
DfT Inclusive Mobility Guidelines	DfT Inclusive Mobility Guidelines - A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure - 2021
ECW	Effective clear width
'Yellow' Guide	Technical standards for places of entertainment - 2019

1 Inclusive Design

1.1 Introduction

The purpose of this Access Statement is to demonstrate how the proposed alterations and extension to the Saville Theatre, 135 Shaftesbury Avenue, is capable of creating an accessible and inclusive built environment, within the existing constraints of the building's heritage.

The Saville Theatre development is to consider and respond to London Plan (2021) Policies D5 'Inclusive Design' and E10 'Visitor Infrastructure' and the London Borough of Camden policies D1 'Design' and C6 'Access for all' to strive towards creating an accessible and inclusive environment that will meet the needs of all Londoners, by removing barriers that create undue effort, separation, or special treatment, so that everyone, regardless of disability, age or gender will be able to use the facilities of the scheme equally, confidently, and independently with choice and dignity.

1.2 Equality Act 2010

The Equality Act 2010 provides the legal framework that protects disabled people from discrimination. The Act replaced the Disability Discrimination Acts 1995 and 2005 (DDA) and creates a piece of anti-discrimination legislation across nine 'protected characteristics'. These are:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

A person has a disability if they have a 'physical or mental impairment' which has a 'substantial and long-term effect on their ability to carry out normal day-to-day activities'.

The Act applies to all providers of services, a public authority carrying out their functions, an association in Great Britain and employers. It applies to all services, whether or not a charge is made for them.

The reasonable adjustments duty within the Act imposes a duty on employers, service providers and public functions to make reasonable adjustments to any physical feature that may put a disabled person at a substantial disadvantage compared to non-disabled people. This 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 Equality Act 2010 carries ongoing responsibilities which will continue once the works to Saville Theatre is completed. As part of considering the design of the building and the physical environment, the building management will need to have suitable management policies and procedures to ensure the obligations of the Act are met once the building is in operation.

1.3 Planning Policy

The following policy guidelines have been considered as part of this Statement:

National Planning Policy Framework 2023:

At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a thread running through both plan-making and decision-taking. The NPPF sets out that planning policies and decisions should ensure that developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.

London Plan 2021:

London Plan Policies recognise that disabled people continue to be excluded from many mainstream activities which other people take for granted and are frequently denied the opportunity to participate fully as equal citizens. The proposals respond to:

Policy D5 'Inclusive Design'

Development proposal should achieve the highest standards of accessible and inclusive design. They should:

- 1) be designed taking into account London's diverse population
- 2) provide high quality people focused spaces that are designed to facilitate social interaction and inclusion

3) be convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment

4) be able to be entered, used and exited safely, easily and with dignity for all

5) be designed to incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.'

E10 'Visitor Infrastructure'

To ensure sufficient choice for people who require an accessible bedroom, development proposals for serviced accommodation should provide either:

1. 10 per cent of new bedrooms to be wheelchair-accessible in accordance with Figure 52 incorporating either Figure 30 or 33 of British Standard BS8300-2:2018 Design of an accessible and inclusive built environment. Buildings. Code of practice; or;
2. 15 per cent of new bedrooms to be accessible rooms in accordance with the requirements of 19.2.1.2 of British Standard BS8300-2:2018 Design of an accessible and inclusive built environment. Buildings. Code of practice.

London Borough of Camden Local Plan:

Policy C6 Access for all

The LBC Local Plan (2017) Policy C6 Access for all states that The Council will seek to promote fair access and remove the barriers that prevent everyone from accessing facilities and opportunities and will:

- expect all buildings and places to meet the highest practicable standards of accessible and inclusive design so they can be used safely, easily and with dignity by all.
- expect spaces, routes and facilities between buildings to be designed to be fully accessible.
- encourage accessible public transport.
- secure car parking for disabled people.

Policy D1 Design

The LBC Local Plan (2017) Policy D1 Design requires that a development:

- integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage.
- Is inclusive and accessible for all.
- Making roads and pavements and the spaces between buildings fully accessible is as important as making the buildings themselves accessible. The Council will seek improvements for all pedestrians to ensure good quality access and circulation arrangements, including improvements to existing routes and footways.

Importantly in the context of the Saville Theatre, the Plan also goes on to say that "Any adaptation of existing buildings must respond to access needs whilst ensuring that alterations are sympathetic to the building's character and appearance".

Policy T1 Prioritising walking, cycling and public transport

The LBC Local Plan (2017) Policy T1 Prioritising walking, cycling and public transport states that the Council will seek to ensure that development:

- provides for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan (Table 6.3) and document Camden Planning Guidance on transport. Higher levels of provision may also be required in areas well served by cycle route infrastructure, taking into account the size and location of the development.
- makes provision for high quality facilities that promote cycle usage including changing rooms, showers, dryers and lockers.

Policy T2. Parking and car free development

The LBC Local Plan (2017) Policy T2. Parking and car free development sets out that the Council: will limit the availability of parking and require all new developments in the borough to be car-free and will:

- limit on-site parking to spaces designated for disabled people where necessary, and/or. essential operational or servicing needs.

1.4 Building Regulations

The Building Regulations provide for minimum standards in respect to health safety and welfare provisions (as well as other matters) in relation to building works.

In respect to accessibility, the principal guidance would be Approved Document M (access for all), supported by other guidance including Approved Documents B and K.

These minimum provisions will need to be met where practicable and feasible to do so within the existing constraints of the building. However as noted above the policy guidelines noted under the London Plan will guide the proposals in respect of the good practice guidelines of BS 8300.

To support any Building Regulations submission, it is usual to provide an Access Strategy or Access Statement. With the historic nature of the Saville Theatre, it would be expected that such a Statement would benefit the proposals, to assist in demonstrating the principles of inclusive design are being met as well as the functional requirements of the Regulations themselves. This element should be considered at the earliest stages of design. It is also particularly relevant of any management procedure is proposed to compensate for any physical barrier to access and use that may have to remain, due to the constraints posed by the existing building.

1.5 Technical guidance

A range of technical guidance will be utilised to assist in ensuring that the proposals will optimises access and inclusion:

- Building Regulations 2010 and associated Approved Documents
- Equality Act 2010
- The London Borough of Camden Local Plan
- The London Plan 2021
- National Planning Policy Framework

Reference will be made to the following documents during design development for this project:

- BS 8300-1:2018 Design of accessible and inclusive built environment Part 1: External Environment
- BS 8300-1:2018 Design of accessible and inclusive built environment Part 2: Buildings

- Building Regulations Approved Document K – Protection from falling, collision and impact 2013
- Building Regulations Approved Document M – Access to and use of Buildings Vol 2: Buildings Other Than Dwellings, 2015
- London Cycling Design Standards, TfL, 2014
- DfT Inclusive Mobility Guidelines - A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure – 2021
- The 'Yellow' Guide- Technical standards for places of entertainment – 2019
- Arts Council - Building Access: A good practice guide for arts and cultural organisations

2 Inclusive Design provisions

2.1 Introduction

Saville Theatre is a Grade II listed theatre, with the Historic England (Listing Number 1271631) citing several key architectural and historic reasons for its listing.

The proposals involve the refurbishment of the theatre area itself, located over ground and four basement levels, but with the addition of 10 levels of hotel accommodation, with bedroom floors and associated facilities (including the reception being at Level 05 of the building).

The Saville Theatre building itself is located on a prominent position along Shaftesbury Avenue, bound on all sides by roadways, with access off pavements to all elevations.



Figure 2—1 Existing Saville Theatre, looking north along Shaftesbury Avenue

Figure 2-1 shows the existing Saville theatre, with Figure 2-2 showing the plan layout:



Figure 2—2 View of Saville theatre from above (Courtesy – Google Maps)

The building itself was built as a theatre and subsequently repurposed as a cinema. As noted, it is proposed to refurbish the theatre element and add hotel accommodation above.

The application of statutory guidance to the proposals will need to be carefully considered. When considering the Equality Act 2010, the objective will be to aim for equitable access and use for all potential users (i.e., 'inclusive'). However, due to the fact the existing building would not have been built with consideration towards inclusivity (as would be considered against current guidelines), there will be challenges with some of the elements relating to access and use, including circulation.

New work should comply with the requirements of the London Plan, Camden Local Plan and the Building Regulations. The altered theatre will be a building which will carry with it a high priority to ensure access and use for all potential users and in this respect, there is an 'anticipatory' duty on ensuring reasonable access for all potential users.

This Statement assesses these elements and considers the technical requirements in respect to access and use, along with elements that will require further development as the proposals move into Stage 3 design.

2.2 Public transport

The site is well served by public transport, with local bus services and Underground Stations available in close proximity. The nearest Underground Stations are situated to the South, being of Leicester Square approximately 160m away and Covent Garden approximately 320m away and to the North via Tottenham Court Road approximately 320m away. Only Tottenham Court Road provides step-free access.

The site is well served by bus route 14, 24, 29, 176, N5, N19, N20, N29, N38, N41 and N279 located toward the south of Saville Theatre at Cambridge Circus along Charing Cross Road located, approximately 120m away.

Shaftesbury Avenue would provide scope for taxis to access and drop off patrons / guests to the relevant entry points into the building off Stacey Street to the Southwest, Shaftesbury Avenue to the Southeast and St Giles Passage to the Northeast. (See also Section 2.5, below).

2.3 Public realm / pedestrian access

The theatre is bound by four streets, St Giles Passage to the northeast, Shaftesbury Avenue to the southeast, Stacey Street to the southwest and New Compton Street to the northwest, as shown in Figure 2-2.

As part of the development the existing surrounding public realm around the building is outside the current red line boundary of the development site. As the design for the development progressed past planning, where feasible and practicable to do so, the external public realm and pavement is to be optimised to consider the highest levels of accessibility and inclusive design.

2.4 Car parking and drop-off

The development is a car free scheme and no car parking is to be provided.

No dedicated drop-off is provided for the development. However, informal provision for setting down and picking up disabled people is available both on Shaftesbury Avenue and Stacey Street.

2.5 Cycle provision

Cycle parking is to be provided at level 01 of the development. Provision to include cycle parking, including provision of non-standard cycles, is to be allowed for in the form of a Sheffield stand with a clear 1000mm access zone to one side of bay.

The cycle parking is to be accessed via a lift accessed directly off St Giles Passage. The lift is approximately 2000mm long by 2000mm wide and would meet AD M Vol 2/BS8300-2. As the design develops reference is to be made to the London Cycle Design Standards Chapter to explore a suitable cycle lift of 2300mm by 1200mm.

2.6 Accessing the building

Access into the theatre for visitors is to be provided via Shaftesbury Avenue and Stacey Street, with Guest access to the hotel being off St Giles Passage.

Direct step-free access is to be provided into all entrance points, access provided via at two door leaves that have a combined effective clear opening width of 1000mm, meeting the provisions of AD M Vol 2 and BS 8300-2. As two smaller door leaves are to be utilised, the entrance doors are to be automated. Further detail of the doors, including automation, controls and opening forces are to be addressed at future design stages.

Where doors open over pedestrian routes, for example along St Giles Passage consideration is to be given to the hazard created and suitable guarding or alternative doors opening provided to align with Approved Document K requirements.

2.6.1 Entrance foyer and reception (theatre), and Hotel entrance and reception

The main entrance foyer to the theatre is located just off Shaftesbury Avenue and will allow a flexible space for reception and ticketing facilities. There is nothing to preclude the theatre foyer area from being accessible and inclusive to all with further detail of key features such as the reception desk and facilities such as a suitable assistive listening system, will be developed during future design stages. The theatre foyer will also benefit from a restaurant, with detail of the restaurant including sanitary facilities subject to future fit-out development.

The Hotel is to be provided with its own dedicated entrance area at ground floor level, with a reception area provided at level 05. There is nothing to preclude this area from being accessible and inclusive to all and future detail of facilities provided is to be addressed at future design stages.

As the design of the theatre foyer and restaurant and the hotel entrance point are developed reference is to be made to AD M Vol 2, BS830-2:2018 and where possible best practice guidance of PAS 6463 'Design for the mind' in their development.

2.7 Horizontal circulation

Horizontal circulation is to be designed in accordance with AD M Vol 2 and BS 8300-2, with circulation routes being a minimum of 1200mm with suitable 1800mm x 1800mm passing places provided at reasonable intervals. Generally, circulation is to be a minimum of 1500mm wide in the new build elements, for example along hotel corridors. However due to the historic nature of the building, particularly at the ground floor levels and below, some reduced circulation routes occur. Further detail of the circulation routes is to be reviewed post planning as the design and fit-out of the theatre spaces is developed in more detail.

All internal door widths in the building have taken into consideration the minimum provisions of AD M Vol 2/BS8300-2 Table 2, whereby new access doors are to provide a minimum effective clear opening width of at least 800mm, with a clear 300mm nib to the pull side of the door.

Further detail of the doors including door opening forces, door furniture and visual contrast are to be addressed during future detailed design stages. In addition, due to the theatre element of the building, doors with acoustic performance criteria will need careful consideration, especially if expected to be used by patrons of the theatre as part of accessing and using the facilities.

2.7.1 Internal ramps

Due to the existing nature of the historic building at the basement levels various level changes occur between the different seating areas. Further detail of the internal ramps and stepped routes is to be addressed during future detailed design stages once future detail of the internal layout and fit-out of the theatre space is developed.

As the design of the internal fit-out develops, where level changes occur, safe and accessible step-free routes are to be created with reference to be made to AD M Vol 2 and BS 8300-2 where ramps are provided. Reference is to be made to AD M Vol 2, AD K and BS8300-2 where stepped routes are provided.

2.8 Vertical circulation

Step-free access is to be provided to all levels of the development in the form of suitably sized passenger lifts. The hotel is to be served by two passenger lifts used by guest and a

separate dedicated firefighting lift. The theatre will be served by three passenger lifts, two passenger lifts used by visitors and a dedicated back of house lift.

All passenger lifts, except for the hotel firefighting lift, are to be designed to meet and exceed the minimum of AD M Vol 2 and BS800-2 of 1400mm long by 1100mm wide. A clear 1500mm by 1500mm landing is to be provided directly outside each lift at each level.

At least one lift serving the hotel and one lift serving the theatre is to be a suitably sized fire evacuation lift as per London Plan Policy D5 'Inclusive Design', providing the provision of step-free egress for all building users.

In addition, general access stairs will also be provided, meeting the minimum provisions in AD M Vol 2, with risers between 150mm-170mm and goings between 250mm-400mm. Detailing of the stairs will be considered as the scheme progresses into Stage 3.

General access stairs will be made available as an alternative to lift access, for those users who prefer to use stairs.

Stairs used for egress (descent only) can be detailed as a utility stair, as noted in AD M, with risers between 150mm-190mm and goings of between 250mm-400mm.

As identified in Section 2.13, the strategy for means of escape will need to consider the design of both lifts, with emergency evacuation lifts being made available, as well as the stairs for general evacuation for the majority of occupants.

2.9 Sanitary facilities

Detail of sanitary facilities to be used by the public for the hotel use are subject to future detailed design stages. As sanitary facilities are developed for the hotel use reference is to be made to AD M Vol 2 and BS8300-2.

Sanitary facilities for the theatre are proposed to be provided on every level. Sanitary facilities are to be provided in the form of separate male and female WCs, along with at least one accessible WC provided adjacent to sanitary facilities. Where the accessible WCs are to be provided they are to be within a 40m travel distance on each floor.

Detail and setting out of the sanitary facilities is subject to future detailed design and fit out of the theatre space and as the design develops reference is to be made to AD M Vol 2 and BS8300-2.

2.9.1 Changing Places Toilet provision

If the theatre results in having an audience that exceeds 350 people, then a Changing Places toilet facilities is to be provided, that can be utilised by patrons and those visiting the theatre. As the theatre develops post planning, if a changing places facility is provided it is to be detailed as per the guidance in Clause 18.6 in BS 8300-2.

2.10 Theatre access and use

This Section provides a high-level overview of the access and use of the theatre facilities for patrons, artists, and staff.

The theatre sits from ground level down to Basement level 04 and forms part of the existing arrangement of the building. Due to this there are some existing constraints of the building and the different levels at these points and they are likely to impact the access and use of this part of the building.

At planning the setting out and layout of the theatre was indicative and is subject to future tenant/operator. As the design develops during future detailed design stages, the aim will be to bring the theatre in line with current building regulations AD M Vol 2 and bringing the theatre design into line with good practice guidance of BS 8300-2, as well as the Arts Council guidance on Building Access.

2.10.1 Vertical access

As noted above in section 2.8, lift and stair access will be provided to all levels of the theatre providing access to all levels for members of the public. Access to back of house facilities will also be provided with lift and stair access.

As the design develops post planning, further detail of the vertical circulation strategy and specification of the passenger lifts is to be detailed. Reference is to be made to AD M Vol 2 and BS8300-2 in the development.

2.10.2 Horizontal circulation

Horizontal access and circulation will meet the provisions noted in Section 2.7 above.

Further review of the movement around the various auditorium levels, both for circulation and access to accessible viewing spaces will be undertaken during future design stages, including access to and use of facilities, such as bars, cloakroom and sanitary facilities.

As the design detail develops for the theatre space, reference is to be made to AD M Vol 2, BS8300-2 and to the Technical Standards of Places of Entertainment (The Yellow Guide).

2.10.3 Front of House facilities

All front of house facilities are subject to future detailed design and fit-out stages and will be developed in technical in line with the guidance of AD M Vol 2 and BS8300-2.

Consideration will be given to:

- Access to accessible viewing spaces along with ensuring adequate sightlines and provision for companion seating.
- Provision for easy access seating (e.g., for those needing additional space and assistance dogs).
- Access to and use of all relevant facilities
- Provision of suitable assistive listening system to the main auditorium
- Consideration towards quiet areas and welfare facilities, such as parenting rooms, baby changing, prayer and / or reflective space(s).

2.10.4 Back of House facilities (BOH)

There is nothing to preclude BOH facilities from being accessible and inclusive to all and further detail and setting out of these spaces will be subject to future design stages. As they are developed reference is to be made to AD M Vol 2 and BS8300-2 in their development.

This will include consideration towards the following:

- Accessible changing rooms (and any green room).
- Accessible shower and WC facilities, ideally linked to an accessible changing facility.
- Support facilities being flexible for access and use by disabled artists.
- Ensuring adequate horizontal and vertical circulation for all artists between the stage entrance door through to the facilities they will use as well as stage / backstage areas.

2.10.5 Theatre seating

As the theatre seating is developed it is to be designed to meet the minimum of AD M Vol 2 Table 3 and to the Technical Standards of Places of Entertainment (The Yellow Guide) with at least 1% of the total seating capacity (rounded up) and the remainder to make a total of 6 via removable seating for seating capacity of up to 600 or 1% of the total seating for over 600.

Additional, where practicable to do so, seating will aim to follow the guidance in BS8300-2 Table 6, with a total of 2% of the seating capacity being permanent wheelchair viewing spaces and a further 1% of removable seating. Providing flexibility in the provision and

location of accessible wheelchair spaces and companion seating will be included and removable seating will further enhance this flexible approach.

Further detail of the seating strategy will be developed as part of future detailed design stages.

2.11 Hotel facilities

The hotel will be the 'new build' element, being constructed from Level 02 through to Level 10, with the reception floor level being at Level 05.

2.11.1 Reception - Floor 5 (and hotel facilities)

At level 05 a dedicated hotel reception is to be provided. There is nothing to preclude this space from being accessible and inclusive to all, with future detail of elements such as reception desk and assistive listening system to be detailed at future design fit-out stages.

Level 05 is to provide a range of guest facilities including:

- Reception point
- Bar and refreshment facilities
- Lounge / informal areas
- Sanitary facilities (including provision of an accessible WC facility).

2.11.2 Vertical circulation

As noted above in section 2.8, lift and stair access will be provided to all levels of the theatre providing access to all levels for members of the public. Access to back of house facilities will also be provided with lift and stair access.

As the design develops post planning, further detail of the vertical circulation strategy and specification of the passenger lifts is to be detailed. Reference is to be made to AD M Vol 2 and BS8300-2 in the development.

2.11.3 Hotel circulation

Horizontal access and circulation will meet the provisions noted in Section 2.7 above.

Further review of the movement around the various auditorium levels, both for circulation and access to accessible viewing spaces will be undertaken during future design stages, including access to and use of facilities, such as bars, cloakroom and sanitary facilities.

As the design detail develops for the theatre space, reference is to be made to AD M Vol 2, BS8300-2.

2.11.4 Accessible hotel bedroom accommodation

Accessible hotel bedroom accommodation provision will be designed to meet London Plan policy E10 'Visitor Infrastructure' with 10% of rooms being wheelchair accessible.

The detailing of the accessible bedrooms will be designed to meet AD M Vol 2 and follow the guidelines in Clause 19.2 in BS 8300-2 as per London Plan Policy E10 'Visitor Infrastructure'. Further detail of the wheelchair accessible hotel bedrooms is to be addressed as part of future detailed design stages.

2.12 Information, signage and wayfinding

As part of the development of the theatre and hotel, the provision of suitable signage will be important, as the varying levels within the building may be confusing for those who are unfamiliar with the building.

In addition, the provision of information in advance of attending either the theatre or the hotel will be helpful for all potential patrons and guests, particularly with any publicity information and details on the respective websites.

This can be developed as part of an integrated package of information and signage strategy as the scheme develops.

2.12.1 Neurodiversity in the internal built environment

As the design of buildings develops consideration should be given to how the internal environment could better consider a wide range of users, including those who are Neurodiverse. As detailed elements of the internal fit-out and finishes are developed, such as internal colours, patterns and finishes, along with provisions of quiet spaces, reference is to be made to best practice guidance of PAS 6463 'Design for the mind- Neurodiversity and the built environment.

2.13 Means of escape

Fire evacuation for disabled people is a combination of physical and management procedures, plus a liaison between the building managers and occupants. The evacuation strategy for disabled people including those with sensory and cognitive impairments should be developed in conjunction with the fire strategy and management policies with references made to AD B and good practice recommendations within BS 9999: 2017.

Fire evacuation lifts have been provided to allow step-free and dignified egress from the building for all potential users, along with the provision of suitable temporary refuge spaces and emergency voice communication system.

This will be an important element of the proposed scheme, due to the mixed-use nature of the building (and the sleeping risk associated with the hotel), so there will be a carefully considered strategy in respect to accessibility and egress in an emergency for all occupants of the building, including disabled people.

2.14 Management related issues

The nature of the building use, particularly the theatre, will necessitate a robust management regime to ensure that all facilities and services offered are equitably accessible for all potential users.

A suitable access management plan is recommended to be developed parallel with the design to ensure all aspects of service provision are addressed as part of the occupation of the building.

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