

14 Bedford Row Access Statement

Statutory and regulatory background

National

Access consultant Earnscliffe, Making Access Work, prepared this Access Statement. It seeks to demonstrate how the design proposals take full account of the following national legislation and building standards, and local planning and development policy requirements for a change of use from office (Class E) to hotel/serviced apartments (Class C1):-

- Equality Act 2010 and in particular the Disability Discrimination Act 1995 (DDA). True North Management as developer and operator has ongoing duties under the DDA.
- DDA Code of Practice: Access – Goods Facilities, Services and Premises, Disability Rights Commission, March 2003.
- Provision required under Approved Document M of the Building Regulations 2010, Access to and use of buildings, 2015 edition Volume 2: Buildings other than Dwellings.
- Approved Document K of the Building Regulations 2010, Protection from falling, collision and impact.
- BS8300:2018 Design of an accessible and inclusive built environment Part 1: External environment – Code of Practice, and Part 2: Buildings.
- British Standard 9999:2008, Code of practice for fire safety in the design, management and use of buildings.
- British Standard 5839-9:2021 relating to fire safety refuges.
- Planning and Access for Disabled People – A Good Practice Guide, department for Communities and Local Government (DCLG).
- National Planning Policy Framework 2021
- PAS 6463 Design for the Mind – neurodiversity and the built environment guide October 2020.

Local

The access provisions have also been reviewed against the following:-

- Camden Council Planning Guidance SPG: Access for All March 2019
- Camden Local Plan 2017
- London Plan March 2021
Mayor of London SPG 7.2 An inclusive Environment
- Wheels for Wellbeing 'A Guide to Inclusive Cycling', 4th Ed. 2020.

Design philosophy

- 1) The Access Statement is based on the social model of disability and the philosophy of inclusive design that maximises access, choice and opportunities for disabled people. Inclusive design is the process by which the needs of everybody are considered and embedded in the proposals for the design, development and subsequent management of the built environment from the outset. The key elements of inclusive design, which benefit everyone, are:
 - ease of use
 - freedom of choice and access to mainstream activities
 - embracing of diversity and difference
 - legibility and predictability
 - high quality.

- 2) Access has been considered in its broadest sense to reflect the needs of individuals with sensory, mobility, cognitive and hidden impairments, neuro-diverse conditions, mental health needs, reduced or hypersensitivity to temperature, and limited reach and stature. This approach should facilitate an inclusive approach to access and ensure that opportunities for maximizing access to all areas of the site development are identified throughout the design process.

Process

- 3) The development strives to maximise access for disabled people, be they guests, staff, or visitors, the process of which will be recorded in the Access Statement as this document develops through the life of the project.
- 4) A suitably qualified access consultant (Earnscliffe) has been appointed to the design team to review and input to the design proposals. Access has been a regular agenda item of design workshops and meetings, and the design team and client have a collective aim of achieving the best possible accessibility across the project through a process of inclusive design and monitoring.

Drawings

- 5) This report reflects an appraisal of the following drawings:-

General Arrangement Plans – White Red Architects

5491-WRA-ZZ-B1-DR-A-00099 Proposed Basement

5491-WRA-ZZ-00-DR-A-00100 Proposed Ground Floor

5491-WRA-ZZ-01-DR-A-00101 Proposed First Floor

5491-WRA-ZZ-02-DR-A-00102 Proposed Second Floor

5491-WRA-ZZ-03-DR-A-00103 Proposed Third Floor

5491-WRA-ZZ-04-DR-A-00104 Proposed Fourth Floor

Context

- 6) The site in London WC1R 4ED comprises three buildings with a combined GIA of 25,384 ft², spanning 14 Bedford Row at the front connected by a central link building at lower ground and ground level to 12-13 and 14 Jockey's Fields at the rear. The L-shaped plot is located within the Bloomsbury Conservation Area, in the London Borough of Camden, within Central London. The site is well served by public transport with buses stopping nearby, including nos. 24, 29, 73, 390 and several night buses, and being only 0.3 miles from Goodge Street and Tottenham Court Road Stations and 0.4 miles from Russell Square.
- 7) No. 14 is Grade II listed although the listing only applies to the rebuilt façade due to its historical significance.
- 8) The project is to convert No. 14 Bedford Row and the adjoining 12-13 and 14 Jockey's Fields from offices into hotel/serviced apartments with 65 rooms and associated guest amenity including a media / cinema room and flexible co-working space for guests, plus staff welfare.

Access provisions

Drop off and Blue Badge parking

- 9) Drop off will be possible immediately outside of the main entrance at 14 Bedford Row and in front of the services entrance of Jockey's Fields at the rear end of the site. The latter has a dropped kerb and level access up to and beyond the door whilst the Bedford Row entrance is stepped beyond the pavement.
- 10) There will be no on-site parking. Blue Badge holders may park within resident permit bays without charge if the bay is not within a Green Zone. The site lies just with the Camden 'Green Zone' but parking with a blue badge bay would be permitted on Great James Street 130m to the north. Furthermore there are two on-street Blue Badge parking bays located on Red Lion Street, approximately 120m from the site.

Cycle Storage

- 11) A cycle store will be located in Jockey's Fields at Ground Floor level with stair and lift connections to the upper floors. There is a level approach to the entrance from the street. There will be sufficient space to accommodate non-standard cycles such as cargo bikes and recumbents used by some disabled people in line with the Wheels for Wellness Policy. This store will be available for all guests.

Entrances

- 12) The main entrance on Bedford Row on the southwest elevation has double leaf doors and offers suitably wide access to wheelchair users.
- 13) As the existing entrance is on the listed elevation it is not feasible to install a permanent ramp here to address the existing three steps. A portable ramp will instead be brought out by staff and an assistance call point mounted on the railings for those unable to access steps to ring for staff.
- 14) The entrance into Jockey's Fields at the opposite end of the site has double leaf doors and level threshold at the same level as the pavement.

Ground Floor Circulation

- 15) From the main entrance building users enter into a spacious Entrance Lobby / Amenity space (G13) from where there are wide double leaf doors into lift lobby (G14). This lobby has been extended by recessing the doors into the entrance lobby to afford generous circulation into both Lift A (G04) and into a nearby accessible unit.
- 16) There is also direct access to stair A (G01) from the entrance lobby and also from the lift lobby.
- 17) The short length of narrow corridor (G16) that adjoins lobby G14 has insufficient space to accommodate a 300mm nib to enable wheelchair users to open the door clear of its swing when passing through into next stretch of corridor (G17). The door will therefore be fitted with a push pad semi-automatic opening device. The approach is straight so wheelchair users will be able to pass through to the next run of corridor without difficulty.
- 18) Corridor G17 is very generous and more akin to a lobby, affording ease of access to an accessible WC located off it, and to the next run of corridor (G20), the door between the two corridors being removed to prevent an obstruction.
- 19) Corridor G20 is a minimum 1100mm wide and turns 90° and continues to a door into the adjoining corridor (G23). There is one pinch point along G20 where the clearance narrows to 1040mm between existing building structure, although this again does not compromise wheelchair access as the approach is straight. The

door between G20 and G23 offers a minimum clear opening width of 800mm and has a 300mm nib.

- 20) Corridor G23 continues in a straight line up to Stair B and Lift B lobby. Again, the corridor is a minimum 1100mm wide. The lobby on the other side of the circulation core offers generous circulation and connects to Corridor G27 which is a wide lobby space offering generous access to both Lift B and a Refuse Store.
- 21) Those entering via the service entrance at the rear of 14 Jockey's Fields will enter into an entrance lobby G26 from where there is level access to Stair B lobby reached through a door-and-a-third leaf arrangement, the larger leaf offering a minimum opening width of 800mm to ensure wheelchair access and from where there is level access to Lift B through an additional wide single leaf door, connecting to all floors.
- 22) There is a connecting corridor between Nos. 14 and 12-13 Jockey's Fields that runs north south on each of the upper three floors. There is a change of level between No. 14 and 12-13 on each floor ranging from three steps at First Floor to two steps at the Second and Third Floors.

Vertical Circulation

- 23) Located beyond the main entrance lobby will be Lift A and Stair A. Lift A will be a generous 3-4m² passenger lift serving all floors except the Fourth i.e. Basement to Third Floor, with a sufficiently dimensioned clear landing at all floor levels.
- 24) Due to planning and heritage restrictions, it is not possible to extend to the Fourth Floor where a lift overrun would be visible above the roof line.
- 25) Stair A is an existing circulation stair and is approximately 860mm wide between handrails. There are handrails to both sides of the flight and contrast nosings.
- 26) In the adjoining 14 Jockey's Fields building Lift B and Stair B address the half level change between 14 Bedford Row and 14 Jockey's Fields, as well as providing access from Basement to Third Floor (the top floor).
- 27) Access to Stair B from the stair lobby is via a single leaf door. This will open outwards away from the stair to maximise the available space for the stair landing. The existing concrete stair meets Part K standards.
- 28) A second single leaf door with a minimum 800mm opening will lead off the stair lobby into Corridor G27 providing a level access route to Lift B, a 3m² passenger lift, with sufficient landings at all floor levels.
- 29) A third lift, 3m² Lift C, located at 12-13 Jockey's Fields, will provide access to guests in Jockey's Fields. There is a north to south link corridor on the upper floors that connects Circulation cores of B and C enabling guests to gain access from the main entrance or rear service entrance by crossing over from No.14 to Nos.12-13.
- 30) At Ground Floor Lift C leads onto two narrow corridors G31 and G30. It should be noted that Lift C and the 904mm wide corridors only serve as a fire escape route for guests in rooms on the upper floors, none of whom will be disabled. There is no Basement level in this portion of the building.
- 31) Stair C similarly only serves guests on the upper levels of accommodation for fire escape purposes and meets Part K.

Basement Floor

- 32) The nine rooms at Basement level, including two accessible rooms, are accessed via Lifts A and B or Stairs A and B. Similarly the Accessible WC (B39), Staff Breakout Space (B33) and very large Communal Amenity Space (B32) in No. 14 Jockey's Fields are accessed by Lift B and Stair B.

- 33) Again, the series of corridors provide a level access link between the 14 Bedford Row and 14 Jockey's Fields and offer a minimum 1100mm for the most part. There is only one pinch point in a similar position to that at Ground Floor, where Corridor B17 narrows to 965mm after a turning circle adjacent to lift core but where the approach is straight and therefore not compromising access. Also between B15 and B17 where an existing opening narrows to 885mm. Again this does not prevent wheelchair access who will have already passed through doors of 800mm.
- 34) Areas outside the lift, accessible rooms and where corridor B17 turns 90° will be extended to provide 1500mm² wheelchair turning for ease of circulation space.
- 35) Lift B and Stair B address the half level change between the 14 Bedford Row and 14 Jockey's Fields for accessing the Accessible WC, Communal Amenity and Staff Space.

Guest Rooms -

Ground Floor and Basement

- 36) These are located on all floors of 14 Bedford Row, 14 Jockey's Fields and all floors of 12-13 Jockey's Fields except Ground Floor due to existing garages.
- 37) At both the Ground Floor and Basement of 14 Bedford Row will be six rooms, two being accessible.
- 38) At both the Ground Floor and Basement of 14 Jockey's Fields will be one room, neither of which is sufficiently sized to be an accessible room.

First Floor

- 39) The upper floors of 14 Bedford Row and 14 Jockey's Fields are not connected.

14 Bedford Row

- 40) Accessed via Lift A and Stair A this floor of Bedford Row contains guest rooms only, with no accessible rooms at this level. Circulation between the circulation core and rooms is via Corridor (113) which is wide with no doors across it and no tight turns.
- 41) There is a level access terrace accessed from the building via Corridor (113) which guests will be able to access via lift and stair from other floors.

Second Floor

- 42) Again, accessed via Lift A and Stair A, this floor contains guest rooms only, with one accessible room. Corridor (213) is again wide with no doors across and no tight turns.

Third Floor

- 43) This is similar to the Second Floor with guest rooms including one accessible room. Again the corridor (313) is generously proportioned and has a 1500mm² turning space on the approach and outside the accessible room.

Fourth Floor

- 44) This floor is not accessible by lift, as previously described and so contains standard rooms and no accessible guest rooms.

14 and 12-13 Jockey's Fields

First to Third Floor

- 45) The building has a number of existing restrictions that render it unfeasible for adaptation to offer wheelchair accessibility.
- 46) Whilst the rooms in 14 Jockey's Fields are of a reasonable size it would be difficult to provide sufficient space for accessible rooms whilst retaining adequate circulation on the approach.
- 47) A number of options have been considered to determine whether accessibility could be provided to 12-13 Jockey's Fields and accessible rooms accommodated. [Options for adaptation are described in detail in 14 Bedford Row – Access Queries. 02/04/2024]. As a result it has been concluded that both access to and within the rooms would be severely compromised.
- 48) Addressing level changes across each floor would result in unacceptably steep narrow ramps and rooms so reduced in size as to make them untenable. Furthermore installing ramps would result in unacceptable limited headroom in a number of areas along circulation routes, which would make the accommodation unsafe for use by visually impaired people, and indeed hazardous to most building users.
- 49) On this basis it is deemed not only acceptable but sensible to provide the 10% accessible rooms within 14 Bedford Row. This argument is further strengthened by the fact that 14 Bedford Row and 14 and 12-13 Jockey's Fields will be a combined offer, with guests perceiving the property as a whole rather than individual building and so the proposals do not undermine the ability of the client to meet the spirit and duties of the Equality Act. Furthermore, the level of provision elsewhere within the site is high considering the restrictions of a listed building and structural constraints, with generous amenity and accessible toilet provision, and, with the exception of the Fourth Floor due to planning and heritage restrictions, ample lift access to all areas.

Accessible Toilets

- 50) A wheelchair accessible WC is provided at Ground Floor, conveniently close to the entrance and amenity space. The cubicle has right-handed transfer. There is a generous landing outside.
- 51) A second wheelchair accessible WC is located within 14 Jockey's Fields adjacent to the Staff Breakout Space and Guest Amenity. Between the two facilities there will be a choice of right and left handing, ensuring there is provision on site should a guest have restricted movement on one side of their body.

Rooms

General Principles

- 52) 10% of the 67 no. rooms will be wheelchair accessible. These will be well distributed across 14 Bedford Row, with two rooms at Ground, two at Basement, one on the Second Floor and one on the Third Floor, and all located close to Lift A and accessed via a wide corridor.
- 53) The proposed serviced accommodation will meet Part M standards for hotel bedroom points 4.17-.24 Sleeping Accommodation.
- 54) As a minimum, the 10% accessible will provide:-

- location close to a lift core
- level approach to each room with external landings of 1500mm²
- private entrance door with a minimum 800mm clear opening width and 300mm nib
- circulation at least 1500mm² turning space and flexible furniture layout
- living area with glazing to principal window may vary as windows are not to be replaced so may exceed 850mm above ffl
- the bed space having a minimum clear 750mm approach zone from the doorway to the window
- bed space having a 1200mm clear zone to one side and end of bed
- step free access to an ensuite bathroom
- level access shower and sufficient turning circles with 1000mm x 1000mm minimum circulation space
- wall structure via pattressing to enable installation of grab rails sufficient to take a 1.5kN / m² load
- basin clear of pan with 1100mm clearance to enable frontal transfer
- slip resistant floor in bathroom
- power sockets located at 450-1200mm above ffl
- visually contrasting ironmongery and furniture
- kitchenette with knee recess in front of drinks preparation area
- refuse store located at ground floor level. A management strategy will be in place for collecting refuse from the wheelchair accessible rooms, as required.

Fire Strategy

- 55) Disabled guests will be encouraged to have a Personal Emergency Evacuation Plan (PEEP), specific to their impairment and individual evacuation needs.
- 56) Areas of safe refuge will be located within or adjacent to circulation cores and appropriate signage and two-way assistance call points provided.

Summary

The design proposals demonstrate a carefully considered approach to inclusive design accessibility.

A high degree of accessibility is achieved within the constraints of an existing listed building.

The proposals are compliant with the performance indicators being Approved Document M 2010 (2015 edition)-Volume 2 – Buildings other than Dwellings, and BS8300:2018 Part 1 (External Environment) and Part 2 (Buildings), and London Plan and LBC planning policy.

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