

## **Appendix 7: Access Statement / Keith Garner**

## **Access statement**

### 1.0 Summary

This statement describes access and inclusion in the proposed refurbishment and extension of existing Georgian townhouses at International Hall to provide improved university accommodation.

The proposal will re-open the original ground floor communal entrance doors to all houses in Lansdowne Terrace and Guildford Street. In this way two wheelchair accessible dwellings will be created in the centre of the terrace on Lansdowne Terrace as well as four accessible and adaptable dwellings.

Access to and within reconfigured dwellings formed on the upper floors will be enhanced where feasible to improve their “visitability” as far as the constraints of the listed terraces will allow.

Step free access to the lower ground floor dwellings via International Hall and the courtyard will be retained and will be enhanced where feasible. There will be five accessible and adaptable dwellings accessed from the courtyard.

The proposal meets Camden Council and London Plan policies by including provision for disabled people and by taking the opportunity to improve access for all.

### 2.0 The site in context

The terrain is broadly level. Pavements are wide (Lansdowne Terrace) or of adequate width (Guilford Street) and generally in good condition. There are local shops and other facilities in Guilford Street and Brunswick Square.

Russell Square underground station is 250m to the west. King’s Cross St Pancras underground and mainline station, which is step-free, is approximately 1km to the north. There are bus services in Russell Square and Theobalds Road.

The site (postcode WC1N 1AS) has a PTAL of 6b, the highest level of accessibility.

### 3.0 Existing situation

The existing situation is highly unsatisfactory. Street level entrances are unused with no direct access from Lansdowne Terrace or Guilford Street. Instead, all houses are reached via International Hall, which has a stepped and ramped entrance, and by taking the lift down to courtyard level to enter the houses at the back.

Access to International Hall has not been audited but from an initial examination does not appear to be fully compliant with guidance.

Internally, the houses are currently arranged as separate units which are poorly laid out and cramped, with small bathrooms and halls that are difficult to access.

## 4.0 Policy background & criteria for assessment

### 4.1 London Borough of Camden

Camden Council’s Local Plan Policy H9 Student housing includes the following:

*The Council will aim to ensure that there is a supply of student housing available at costs to meet the needs of students from a variety of backgrounds in order to support the growth of higher education institutions in Camden and Camden’s international academic reputation.*

Supporting paragraph 3.257 states:

*The optional Building Regulations intended to secure accessible homes do not apply to student housing. Nevertheless, in accordance with Policy H6 Housing choice and mix, the Council will seek housing suitable for people with disabilities, and will expect a proportion of accommodation in student housing developments to be suitable for occupation by students who are wheelchair users, having regard to the proportion of wheelchair users among the student body and the wider population.*

### 4.2 Inclusive Design & the London Plan

Inclusive Design is defined by the National Planning Policy Framework as: *“Designing the built environment, including buildings and their surrounding spaces, to ensure that they can be accessed and used by everyone”*.

London Plan Policy 7.2 on achieving an inclusive environment includes: *“The Mayor will require all new development in London to achieve the highest standards of accessible and inclusive design and supports the principles of inclusive design..”*

### 4.3 Building Regulations

The proposals take account of AD M Volume 2 paragraph 4.24, in particular sub paragraph g requiring that at least one wheelchair-accessible bedroom is provided for every 20 bedrooms or part thereof.

The proposals also take account of, and make reference to, guidance in AD M Volume 1: dwellings. Volume 1 is felt to be relevant to this application given the nature of existing buildings consisting of terrace housing, principally containing individual flats on each floor.

Alterations will be carried out so that the terraces are no less compliant with requirement M4(1) for Category 1 visitable dwellings than prior to building work. Where feasible the opportunity is taken to increase compliance with requirement M4(1) .

The proposals have also been designed with reference to guidance in AD M Volume 1 for Category 2 accessible and adaptable dwellings and Category 3 wheelchair user dwellings, incorporating these dwelling types where constraints of the listed terraces permit.

The proposals also take account of AD K section K1 on stairs, ladders and ramps, where considered feasible given the Grade II listing and existing historic features.

## 5.0 Access proposals generally

The proposals have been designed to take opportunities to improve access for all and promote inclusivity, in accordance with Camden Council's and the Mayor's aspirations and as far as the constraints of the listed terraces will allow.

The key access improvement proposed is that historic communal entrance doors to each of the houses on Lansdowne Terrace and Guilford Street will be reopened, giving a direct route to the hallway and staircase, with level or near level access (a maximum of two steps) to all ground floor flats.

No3B Lansdowne Terrace has level access and is sufficiently large to become a Category 3 wheelchair user dwelling, with some minor derogations.

No2B Lansdowne Terrace has a single step off the pavement and a step at the communal door but is also sufficiently large to become a Category 3 wheelchair user dwelling with some minor derogations. No2B is proposed to be adaptable to meet the needs of wheelchair users.

No2B and No3B are in the middle of the row of four houses in the terrace and will thus be fully integrated into the development in accordance with inclusive design principles.

Four other dwellings on the ground floor will become Category 2 accessible and adaptable dwellings, with some derogations due to the constraints of the existing houses.

The dwellings on the upper floors will be accessed by the existing communal stairs, enhanced in terms of visibility of step nosings, lighting etc as guidance in AD K where appropriate.

The layouts of dwellings on the upper floors will be enhanced in accordance with guidance in AD M for Category 1 visitable dwellings where feasible.

Five dwellings on the lower ground floor will become Category 2 accessible and adaptable dwellings, with some derogations due to the constraints of the existing houses.

## 6.0 Lansdowne Terrace

### 6.1.0 **No1 Lansdowne Terrace**

#### 6.1.1 Communal entrance and hallway and ground floor flats

No1 Lansdowne Terrace has a single step off of the pavement of approximately 150mm and a minor level change of 40mm at the communal entrance door. There are historic double doors opening into a broad passageway.

Studio units Nos1B and 1C on the ground floor are entered via small lobbies, with straight access without the need to turn. The dwellings will be enhanced in accordance with guidance for Category 1 visitable dwellings where feasible.

#### 6.1.2 Vertical circulation

There is an historic stair in a dog-leg arrangement to the lower ground and upper floors with a central balustrade and handrail. The stair is in poor structural condition and will be repaired. A second handrail could be added on the flight to the lower ground floor but would have a

detrimental impact on the historic quality of the staircase from the ground floor upwards. Stairs in other houses on Lansdowne Terrace and Guilford Street are similar.

No1A on the lower ground floor also has external stepped access (with winders) via the front area entering the flat via the kitchen door.

#### 6.1.3 Flats on upper floors and lower ground floors

Flats will be enhanced in accordance with the guidance for in AD M for Category 1 visitable dwellings where feasible, including entrances, new internal stairs to the mansard floor and WCs.

### 6.2.0 **No2 Lansdowne Terrace**

#### 6.2.1 Communal entrance and hallway

No2 Lansdowne Terrace has a single step off the pavement of approximately 100mm and a single step at the communal entrance door of 90mm.

There is a single wide door opening into a broad passageway leading to No2B and the staircase. Access to the entrance of No2B will be improved by the rebuilding of a non-original element of curved wall opposite the bottom step of the stair, to give a minimum 900mm clear width approach. This is the maximum feasible structural adjustment and is considered to be navigable.

#### 6.2.2 Ground floor flat – wheelchair adaptable dwelling M4(3)2a

No2B will become a Category 3 wheelchair user dwelling and will be configured so that it can be easily adapted for a wheelchair user as M4(3)2b. The dwelling will have a reduced size of WC/shower in relation to the guidance.

Note that No2B is treated as a wheelchair user dwelling despite the two steps at the entrance. The location close to local shops and other services and the fact that the dwelling meets most other Category 3 criteria is likely to make it suitable for some wheelchair users.

#### 6.2.3 Flats on upper floors and lower ground floors

There is a stair to the lower ground and upper floors. The stair has a central balustrade. A second handrail on the wall side is proposed on the flight to the lower ground floor.

Flats on upper floors will be enhanced in accordance with the guidance for Category 1 visitable dwellings where feasible, including provisions for entrances, new internal stairs, and WCs.

### 6.3.0 **No3 Lansdowne Terrace**

#### 6.3.1 Communal entrance and hallway

There is a level approach from Lansdowne Terrace with a 30mm level change at the threshold which will be overcome by local adjustment. There is wide historic door with a wide nib on the following edge on the outside and a narrower nib of 130mm on the leading ends on the inside. Detailed consideration will be given to improving access to the door at the next stage.

There is a wide hallway, sufficient to allow a 1500mm turning circle leading to No3B and the staircase. As with No2, the curved wall opposite the bottom step of the stair will be rebuilt to give a minimum 900mm clear width approach to the entrance to No3B.

#### 6.3.2 Ground floor flat No3B – wheelchair user dwelling M4(3)2b

The flat will become a Category 3 wheelchair user dwelling. Given the constraints of the listed building there will be some deviations from guidance in AD M Volume 1. For example, the existing rear wall intrudes slightly on the wheelchair storage and transfer space. Similarly, the depth of the WC/shower is 2130mm not 2200mm.

#### 6.3.3 Flats on upper floors and lower ground floors

There is staircase in a dog-leg to the lower ground and upper floors similar to No2.

Flats on upper floors will be enhanced in accordance with the guidance for Category 1 visitable dwellings where feasible, including provisions for entrances, internal stairs and WCs.

#### 6.4.0 **No 4 Lansdowne Terrace**

##### 6.4.1 Communal entrance and hallway

There is a level approach from the pavement and a single step of 140mm on the line of the door. There is a single wide door.

##### 6.4.2 Ground floor flat No4B – accessible and adaptable dwelling M4(2)

The ground floor flat will become a Category 2 accessible and adaptable dwelling with some derogations.

##### 6.4.3 Flats on upper floors and lower ground floors

There is staircase in a dog-leg to the lower ground and upper floors similar to No2.

Flats on upper floors will be enhanced in accordance with the guidance for Category 1 visitable dwellings where feasible, including provisions for entrances, internal stairs and WCs.

#### 7.0 **Nos 89, 90 and 91 Guilford Street**

The houses have a single step on the pavement line and a single step on the door line with wide communal entrance doors and a broad hall.

Internal arrangements are similar to houses on Lansdowne Terrace. Three of the four dwellings will become Category 2 accessible and adaptable dwelling, with some derogations.

The communal stairs are generally historic and have winders. A second handrail will be added to the wall face of the flight between ground and lower ground level.

Flats on upper floors will be enhanced in accordance with the guidance for Category 1 visitable dwellings where feasible, including provisions for entrances and WCs.

#### 8.0 **No 92 Guilford Street**

This house, on the corner of Guilford Street and Lansdowne Terrace, will be restored to reflect its more unusual historic plan form and will be occupied as a shared student house with 8 bedrooms/15 people (to be confirmed). The street level front door access will be reinstated with communal kitchen/dining rooms and a bathroom at ground floor level. There will be a utility room and WC at lower ground floor level. The house will have step-free access from the courtyard via International Hall.

#### 9.0 **Lower ground floor flats accessed via the courtyard**

There will be step-free access via the courtyard to lower ground floor dwellings Nos 89A, 90A, 91A, No 92 Guilford Street (shared student house) and Nos 1A, 2A, and 3A Lansdowne Terrace.

Nos 89A, 90A, 91A Guilford Street and Nos 2A and 3A Lansdowne Terrace will become Category 2 accessible and adaptable dwellings with some derogations. In particular there is no 300mm nib on the inside of external doors. Detailed consideration will be given to improving access to the doors at the next stage.

#### 10.0 **Accessible cycle storage and parking**

There are parking spaces in front of Nos 1-4 Lansdown Terrace with space for an on-street designated accessible parking bay in front of the proposed wheelchair accessible flat at No3. The provision of the bay will be agreed with the highway authority in due course.

There is the opportunity to provide cycle storage units in front of Nos 1 and 2. Some units could be given over to non-standard cycles such as tricycles or recumbents if required. The installation is to be agreed with the highway authority in due course.

#### 11.0 **Points for consideration at the next stage**

11.1 To review the route to the lower ground floor flats via International Hall and the exterior courtyard. The review will include the existing ramped and stepped entrance to International Hall on Lansdowne Terrace, the lift and stairs down to courtyard level, and access into the courtyard.

11.2 An initial review was carried out on 16<sup>th</sup> April 2024. The route appears generally accessible with a recent lift 1400mm deep x 1100mm wide, generally as AD M and an accessible route to the courtyard at lower ground floor level. A typical corridor door at lower ground floor level was 850mm ECW. There is level access into the courtyard.

11.3 A separate access audit of communal spaces in International Hall with key recommendations is advisable.

## 12.0 Table of accommodation

The accommodation will provide accessible and adaptable and wheelchair user dwellings equivalent to the standards in Approved Document M Volume 1 as far as the constraints of the listed terraces will allow in the following locations:

	89 Guilford Street	90 Guilford Street	91 Guilford Street	92 Guilford Street
Third / Fourth				
Second				
First				
Ground	M4(2)**	M4(2)**	M4(2)**	
Lower ground	M4(2)***	M4(2)***	M4(2)***	

	1 Lansdowne Terr.	2 Lansdowne Terr.	3 Lansdowne Terr.	4 Lansdowne Terr.
Third/ Fourth				
Second				
First				
Ground		M4(3)2a **	M4(3)2b *	M4(2)**
Lower ground		M4(2)***	M4(2)***	

\* Minor derogations from AD M.

\*\* Two steps at communal entrance.

\*\*\* Existing communal entrance door 780mm ECW in Guilford St. 750mm ECW in Lansdowne Terr.

### References

Approved Document K. Protection from falling, collision and impact. 2013 edition.

Approved Document M. Access to and use of buildings. Volume 1 - Dwellings. 2015 edition.

Approved Document M. Access to and use of buildings. Volume 2 - Buildings other than dwellings. 2015 edition.

A Roadmap for Accessible Housing. Habinteg Housing Association 2022.

Wheelchair Housing Design Guide, Third Edition. RIBA Publications.

Wheels for Wellbeing. A guide to inclusive cycling. 2017

CABE. The principles of Inclusive Design. (They include you.)

<https://www.designcouncil.org.uk/fileadmin/uploads/dc/Documents/the-principles-of-inclusive-design.pdf>

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