



## Britannia Street

Purpose Built Student Accommodation (PBSA)

## Access Statement

Direct Access Consultancy

13<sup>th</sup> January 2025

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# 1 Introduction

This short introductory section will set out the role and experience of the access consultant on the project and relevant accompanying documents. The site on Britannia Street and Wicklow Street will be described followed by a description of the proposed development.

## 1.1 Access Role

Direct Access Limited have been commissioned by Curlew Developments London to perform the duties of Access Consultant on the Britannia Street project. Direct Access are an established access consultancy company based in Nantwich, Cheshire and have been operated and founded by disabled people for almost 20 years. Over 80% of our staff are disabled people and we operate nationally and internationally providing access consultancy and access auditing services. Tom Morgan, our head of access consultancy is a consultant level NRAC (National Register of Access Consultants) Access Consultant and is assigned to provide the required services for the Britannia Street Purpose Built Student Accommodation (PBSA) development project.

Direct Access have worked with the project management team Gleeds Management Services, planners Knight Frank and the principal design team and architects Sheppard Robson to develop the proposed design to this stage. The submitted design has been subject to review and discussion with issues of accessibility raised and addressed in order to ensure a high standard of inclusive design is achieved.

This Access Statement should be read in conjunction with the Design and Access Statement (DAS) and all relevant architectural drawings.

## 1.2 Inclusive Design Strategy

The aim for this development is the creation of an inclusive environment that is accessible for everyone. The core principles of inclusive design place people at the heart of the design process holistically without excluding those that may not be considered as part of traditional design practices. Inclusive design means designing and building places that everyone can enjoy confidently and independently with choice and dignity. A truly inclusive design promotes integration between traditionally marginalised groups by creating useable environments that offer everyone equality of experience. Inclusive design is a rational, practical and beneficial design strategy. For example, step-free access benefits wheelchair users, ambulant disabled people and elderly people as well as anyone that suffers a temporary injury. 1 in 5 people in the UK are disabled people<sup>1</sup>, and in 2019/20 332,300 (17.3%) of UK higher education students said that they had a disability.<sup>2</sup>

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<sup>1</sup> Source: Family Resources Survey (2019 to 20)

<sup>2</sup> Support for disabled students in higher education in England 2021, <https://commonslibrary.parliament.uk/research-briefings/cbp-8716/>

The Proposed Development has incorporated the following four principles of inclusive design to ensure that all parts of the built environment...:

- Can be used **safely, easily and with dignity** by all regardless of disability, age, gender, ethnicity or economic circumstances
- Are **convenient and welcoming** with no disabling barriers, so everyone can use them independently without undue effort, separation or special treatment
- Are **flexible** and responsive taking account of what different people say they need and want, so people can use them in different ways
- Are **realistic**, offering more than one solution to help balance everyone's needs, recognising that one solution may not work for all.

The development will incorporate the technical requirements of Building Regulations Part M and give regard to the London Plan as required under Camden Council Planning Guidance. Further specialised design guidance, such as BS8300<sup>3</sup> and PAS6463<sup>4</sup>, relating to inclusive design and access for disabled people will also be incorporated to achieve an accessible and inclusive design.

### 1.3 Site Description

The Site is located approximately 0.4 miles southwest from Kings Cross & St Pancras international station, and sits within the southwestern pocket of the Kings Cross Conservation Area known as Sub-Area 4. The site of the proposed development is located within the Knowledge Quarter consisting of over 75 academic, cultural, research, scientific and media organisations of all sizes representing one of the highest densities of knowledge-based businesses and science organisations in the world.<sup>5</sup>

The site lies within a network of streets of industrial warehouse type buildings, many of which have retained their original character having been re-purposed over recent years. It is bounded to its Northern side by Britannia Street and to the south by Wicklow Street which form the sites 2 road frontages. A railway cutting forms the Western boundary with the eastern edge bordered partially by residential buildings and gardens.

The site is currently used as a small surface car park with its access from Britannia Street.

The site is being brought forward for re-development as Purpose Built Student Accommodation (PBSA) and it benefits from the proximity to existing UCL student housing, and the wider campus, which make the site appropriate for student accommodation use.

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<sup>3</sup> BS 8300-1 & 2:2018 Design of an accessible and inclusive built environment. Code of practice.

<sup>4</sup> PAS 6463, Design for the mind – Neurodiversity and the built environment – Guide, 2022.

<sup>5</sup> <https://www.rvc.ac.uk/research/news/general/london-s-knowledge-quarter-is-one-of-the-world-s-best-locations-for-science-and-innovation>



Figure: 1 Ariel View of Site<sup>6</sup>



<sup>6</sup> Google Earth © <https://earth.google.com/web/@51.52800605,-0.118062,342.52749234a,0d,35y,-0.0001h,27.5541t,359.9999r/data=CgRCAggBOgMKATBCAggASg0I> ARAA

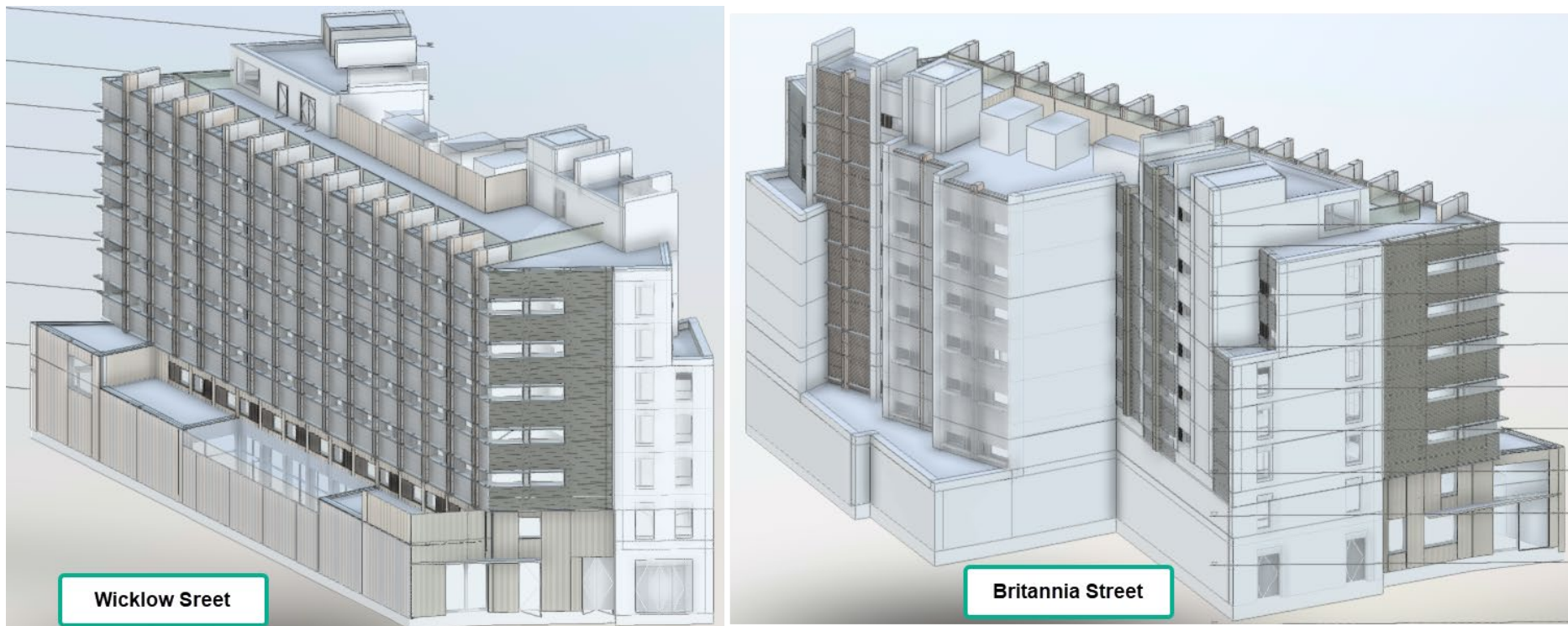


## 1.4 Proposed Development

The proposed development will replace the existing car park with approximately 5,363m<sup>2</sup> of Purpose-Built Student Accommodation (PBSA) (121 student rooms) including ancillary and 77.6m<sup>2</sup> community use spaces. The development will provide PBSA Amenity Space on the Ground Floor complimented by the availability of outdoor space on the ground floor and a rooftop terrace. The ground floor also features community and building management space with associated access and sanitary provision.

The configuration of the buildings consists of 7 storeys, ground floor plus 6 upper levels including the roof terrace level. Amenities, management and community space are all located on the ground floor with all student accommodation provided on floors 1-6.

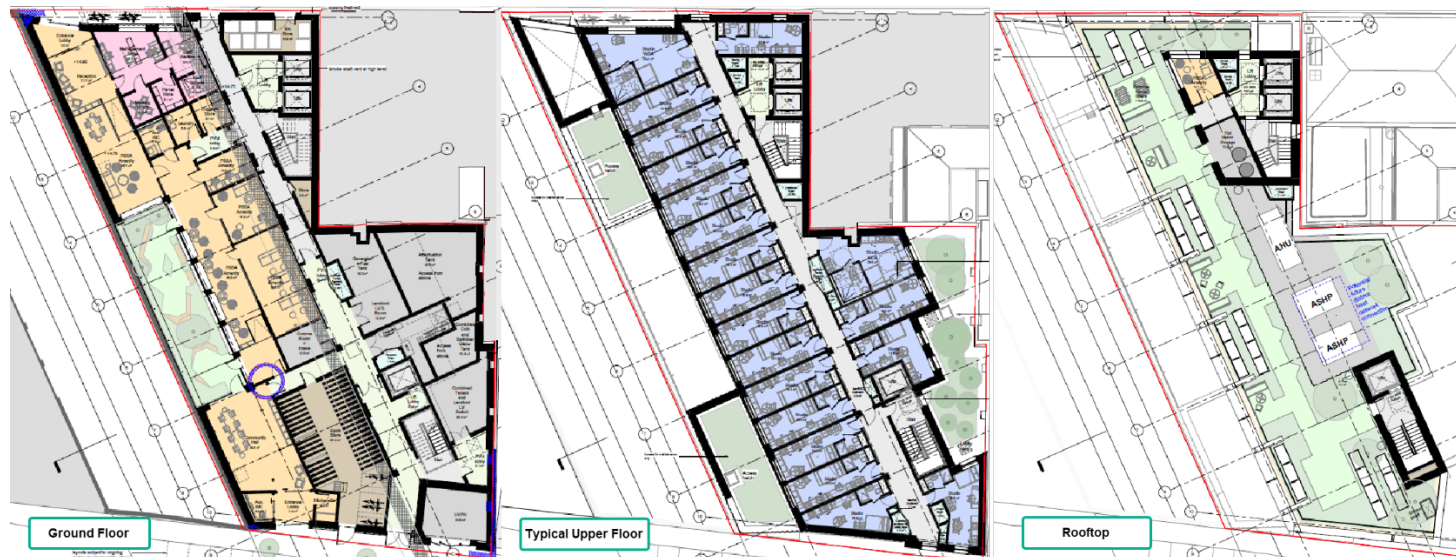
**Figure: 2** Isometric Views



Each function is served by dedicated street level entrances that offer independent access to key areas:

- The community space located at ground floor level is served by dedicated step-free level access from Wicklow Street or from the interconnecting internal ground floor circulation and also includes an Accessible WC and kitchenette accessed from the Wicklow Street entrance lobby.
- The PBSA is accessed via step free level access at the principal Britannia Street entrance and from the secondary Wicklow Street PBSA entrance. Dedicated entry is also provided on Wicklow Street via the entrance to the Cycle Store.
- The ground floor provides full level access throughout with level changes managed by short ramps to provide full access to ground floor facilities featuring reception and management suite, Accessible WC & Shower, Parcel Store, Office Space and Parcel Room.
- The ground floor provides full level access throughout all PBSA Amenity Space with level changes managed by short ramps to provide full access to ground floor facilities featuring Accessible WC & Shower, Laundry, Luggage Store, Meeting & Workspace and Cycle Store
- Vertical Circulation is provided by a total of 3 lifts serving all levels including the rooftop terrace.
- Each of the North and South lift cores features 1x Evacuation Lift suitable for use by disabled people in the event of an emergency.
- The PBSA upper levels 1-6 feature clusters of student accommodation with accessible rooms with integrated kitchen facilities.
- The PBSA accommodation provided features direct access via 3no lifts to the outdoor space provided at the rooftop terrace.

**Figure: 3** Ground Floor, Typical Upper Floor and Rooftop Terrace.





## 1.5 Access Management

This Access Statement demonstrates the inclusive design and accessibility of the design of the scheme. It should be noted that the design is only at the beginning of the development life-cycle and that the built environment will need to be operated and managed correctly to ensure that the scheme delivers an inclusive end user experience. This is acknowledged in the London Plan's Accessible Housing Supplementary Planning Guide (2016):

*“The effective management of PBSA is key to student’s satisfaction with their accommodation...”<sup>7</sup>*

The management of the built environment provided by the finished scheme will benefit from the flexibility stated at the outset as a key principle of inclusive design. Utilising flexibility can be achieved by practices such as implementing accessible booking procedures and ensuring that procedures are in place to source equipment and adapt rooms and spaces to accommodate user needs. Pre-booking information is important to allow potential students to fully assess the accommodation before they commit and procedures must be in place to ensure permanent staff have suitable Disability Awareness Training.

Maintenance and monitoring procedures must be implemented to ensure that parking and drop-off is managed efficiently and that all accessible sanitary provision is maintained correctly and fit for purpose. This includes management of student drop-off when moving into the premises and the management, monitoring and testing of accessible WC call alarms to ensure that they remain functioning and available at all times.

PEEPs (Personal Emergency Evacuation Plans) should be provided for any disabled person as a student or member of staff to ensure that any assistance or equipment required is available and functional in the event of an emergency. These procedures must also be regularly rehearsed to ensure that any personnel are familiar with the use of the Evacuation Lifts and the provision of any specialist equipment for specific disability needs.

All of these issues and more can be collated in an Inclusive Access Management Plan (IAMP) to help ensure that the premises continue to be accessible and inclusive following handover. The IAMP performs the role of a building manual specifically relating to the use of the building by physically, sensory and cognitive & neurodiverse disabled people.

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<sup>7</sup> The London Plan's Accessible Housing Supplementary Planning Guide (2016)/3.9.24 “

## 2 Legislation, Policy and References

### 2.1 Equality Act 2010

The Equality Act (EA) superseded the Disability Discrimination Act (DDA) in 2010 and maintains the same underlying philosophy regarding discrimination on the grounds of disability applied to the design of the built environment. The EA aims to protect the nine identified 'protected characteristics' of which one is 'disability'.

The Equality Act (EA) superseded the Disability Discrimination Act (DDA) in 2010. The Equality Act 2010 unified equality legislation to offer a strengthened and more consistent statutory law. The EA protects nine different characteristics, one of those is disability. The EA aims to prohibit discrimination, harassment and victimisation. Under the EA there is an anticipatory duty to reasonably predict and accommodate the needs of disabled people as well as a vicarious liability relating to the actions of members of staff.

The definition of a disabled person under the EA is 'someone who has a physical or mental impairment which has a substantial and long-term effect on his or her ability to carry out day to day activities', where 'substantial' is defined as 'not minor or trivial'. The EA definition is wider than that of the DDA and therefore more disabled people will meet the current EA definition of disability. Government figures indicate that there are around 13.3 million disabled people in the UK (almost one in five of the population)<sup>8</sup>. Around 7% of children are disabled, compared to 18% of working age adults and 44% of adults over State Pension age<sup>9</sup>.

Under the Equality Act 2010, discrimination includes:

- **Direct discrimination** - because of their disability a disabled person receives worse treatment than somebody who is not disabled.
- **Indirect discrimination** - a policy rule or practice that is applied to everyone places people with a particular disability at a disadvantage compared to people without that particular disability, unless it can be justified.
- **Discrimination arising from disability** - a disabled person is treated unfavourably because of something connected with their disability but not their disability itself, unless it can be justified.

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<sup>8</sup> Family Resources Survey 2015/2016 [www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/600465/family-resources-survey-2015-16.pdf](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/600465/family-resources-survey-2015-16.pdf)

<sup>9</sup> Family Resources Survey 2015/2016 [www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/600465/family-resources-survey-2015-16.pdf](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/600465/family-resources-survey-2015-16.pdf)

The EA places specific duties on providers of goods, facilities and services (Part 3), employers (Part 5), those leasing or selling land or property (Part 4), and education providers (Part 6). The client, management and operators of the development at The Piano Factory, Stour Road development must meet their obligations as service providers (Part 3) and education providers (Part 6) under the EA.

Under the EA these duties require that where disabled people are placed at a 'substantial disadvantage', 'reasonable adjustments' be made to avoid the disadvantage caused by policies, practices or physical features and to provide auxiliary aids.

The EA does not override other building related legislation such as planning, building regulations, listed building, health & safety or fire regulations. The EA does not provide any prescriptive design guidance relating to buildings or services. Where guidance is required the range of standards referred to in this report offer a measure to justify any decisions taken during the implementation of reasonable adjustments.

The duty to make reasonable adjustments is triggered when a disabled person experiences a 'substantial disadvantage' compared to the same experience of a person who is not disabled. This EA approach improves on the DDA which only required 'reasonable adjustments' where it was 'impossible or unreasonably difficult' for disabled people to access services. The EA offers a more robust and strengthened threshold.

Under The Equality Act 2010 service providers should consider making adjustments to.

- Provisions, criteria and practices that govern the way in which goods, services and facilities are made accessible to disabled people.
- Physical features by removing, altering or reasonably avoiding them, or providing a reasonable alternative method of making the services available to disabled people.
- The provision of auxiliary aids and services to make it easier for disabled people to use and access goods, facilities and services.

Further information and Codes of practice on the EA and its application can be found at <https://www.equalityhumanrights.com/en/equality-act/equality-act-2010>

The EA places a duty on building management, owners and operators, as service providers, to make reasonable adjustments to make sure that disabled people are able use the services offered in the building as far as is reasonably possible to the same standard usually offered to non-disabled people. The design team are aware of these responsibilities and have designed accordingly to allow equality of access that will ensure that the premises and any associated public realm can meet any obligations under the duties of the EA.

The access strategy applied to the Britannia Street PBSA development goes beyond physical access requirements and includes design to meet the needs of sensory disabled people and cognitive and neurodiverse disabled people. Designing for these particular issues often requires simple yet effective alterations that can improve colour contrast and tactile surfacing and wayfinding cues or provide sheltered, quieter and more separated areas that allow a calm escape in what could be a crowded or busy area that can be uncomfortable at a sensory level.



## 2.2 Building Regulations

The Building Regulations provide technical guidance to be followed to ensure that building achieve a good level of inclusive design and access for disabled people. The Building Regulations that apply regarding accessibility and inclusive design are:

- Approved Document M: access to and use of buildings Volume 1: dwellings
- Approved Document M: access to and use of buildings Volume 2: buildings other than dwellings
- Approved Document K - Protection from falling, collision and impact
- Approved Document B (Fire safety) – Volume 1: Dwellings
- Approved Document B (Fire safety) – Volume 2: Buildings other than dwellings
- Approved Document T: Toilet accommodation

## 2.3 Strategic level policy, London Plan 2021

The London Plan 2021 requires the highest standard of inclusive design to be applied to all developments in every London borough. The London Plan is the overall strategic plan for London and sets out the special design strategy as an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years.

This strategic level policy refers to inclusive design specifically in policies D3 & D5:

### Policy D3

*“2) encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples’ movement patterns and desire lines in the area.”<sup>10</sup>*

*“5) achieve safe, secure and inclusive environments.”<sup>11</sup>*

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<sup>10</sup> The London Plan 21/D3 Form and layout/2

<sup>11</sup> The London Plan 21/D3 Experience/5

## Policy D5

“ B) 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.<sup>12</sup>”

The policy quoted above once again emphasises the requirement for inclusive design as part of the public realm to provide access for all pedestrians and cycle traffic. The policy also prescribes some technical guidance regarding evacuation lifts in addition to more general requirements regarding equitable, inclusive and accessible circulation.

## 2.4 Strategic level policy, London Plan Guidance, Purpose-built Student Accommodation 2024

The London Plan Guidance (LPG) for Purpose-built Student Accommodation (PBSA) 2024 provides detailed advice on how to apply London Plan Policy H15 to meet the needs of students in London. The guidance helps planning authorities, developers, and higher education providers align their projects with the London Plan's broader objectives.

In the document there are requirements for PBSA in relation to safety, inclusivity, accessibility and integration with the surrounding community. The guidance states the same detail in relation to accessible room provision, as below:

*“Wheelchair accessible room provision is expected at a level of 5 per cent, with a further 5 per cent adaptable, in line with the guidance in BS8300:2:2018 Design of an Accessible and inclusive built environment – Buildings – Code of Practice.”<sup>13</sup>*

The guidance also recommends BS8300 standards regarding hoist provision. This requires a single accessible room to be fitted with an overhead tracked hoist system and a connecting door to an adjoining room that can be occupied by a carer or assistant.

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<sup>12</sup> The London Plan 21/D5 B

<sup>13</sup> London Plan Guidance, Purpose-built Student Accommodation 2024, 2.5.9.

## 2.5 Local level policy, Camden Council Local Plan and Planning Guidance

At a local level the Britannia Street PBSA development must comply with the requirements of Camden Council Local Plan and Planning Guidance (CPG), in particular CPG – Access for all relating to inclusive design, and CPG – Student Housing.

### 2.5.1 Camden Council Local Plan (CLP)

The CLP sets out the Council's planning policies at a local level to respond to changing circumstances and the borough's unique characteristics whilst delivering on the strategic objectives of the Camden Plan and other local priorities. The CLP sets out the following general requirement regarding student accommodation.

*"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."*<sup>14</sup>

### 2.5.2 Camden Council Planning Guidance (CPG) – Access for all

The CPG – Access for all sets out general requirements for accessibility applied to every built environment planned for the borough of Camden. The CPG does not contain specific guidance relating to student accommodation but it does contain general requirements such as that stated below as one of CPGs key messages:

- *"The Council expects all development of buildings and places, including changes of use and alterations or refurbishment of existing buildings, to be inclusively designed and useable by all to promote equality of opportunity.*
- *Access should be considered at the beginning of the design process. Design and Access Statements for new developments and spaces should contain an inclusive design statement, including the specific needs of disabled people, have been integrated into the proposed development."*<sup>15</sup>

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<sup>14</sup> Camden Council Local Plan, 2016, 3.257

<sup>15</sup> Camden Planning Guidance – Access for all, 2016, 1.5



### 2.5.3 Camden Council Planning Guidance (CPG) – Student Housing

The CPG – Student Housing sets out specific requirements for student accommodation relating to supply, mix, design and planning obligations. The CPG contains the following regarding access and accommodation for disabled people.

*“Policy H6 of the Camden Local Plan 2017 indicates that we will encourage design of all housing to provide functional, adaptable and accessible spaces, while Local Plan paragraph 3.257 states that we will expect a proportion of accommodation in student housing developments to be suitable for occupation by students who are wheelchair users. However, there is no specific target in the Local Plan or the London Plan for the proportion of rooms in student housing that should provide for wheelchair users or other people with disabilities.”<sup>16</sup>*

*“Design of student housing should meet all relevant objectives and requirements of part M volume 2 of the Building Regulations.”<sup>17</sup>*

*“The Building Regulations relevant to the accessibility of new-build student housing are in Approved Document M.....purpose-built student living accommodation should be treated as hotel / motel accommodation in relation to space requirements and internal facilities, as set out in paragraphs 4.17 to 4.24 of Approved Document M: volume 2. These include a requirement for at least 5% of bedrooms to be wheelchair accessible.”<sup>18</sup>*

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<sup>16</sup> Camden Planning Guidance – Student Housing, 2016, 4.23

<sup>17</sup> Camden Planning Guidance – Student Housing, 2016, 4.25

<sup>18</sup> Camden Planning Guidance – Student Housing, 2016, 4.24

## 3 Proposed Development Details

### 3.1 External Circulation

Any impact on external circulation is limited to the pavements on Britannia Street and Wicklow Street that will achieve full level access to all entrances and a consistent surface finish in keeping with the character of the connecting pavements.

Secure lighting will be provided to ensure an even distribution of lighting without glare that will aim to achieve a minimum illuminance of 100 lux on pedestrian routes adjacent to building entrances.

### 3.2 Cycle Storage

The prevalence and use of cycle storage both internally and externally must be managed correctly following handover to ensure that cycles do not obstruct access routes. Procedures to be included as part of IAMP (See 1.5).

#### 3.2.1 External Cycle Stands

Cycle spaces are located externally on Britannia Street but may be omitted on police advice. A large internal PBSA Cycle Storage area is provided with a dedicated entrance on Wicklow Street. Any external cycle stands will be positioned clear of access routes and will be of a contrasted finish to make them more visible for blind and partially sighted people.

#### 3.2.2 Internal Cycle Storage

To serve the PBSA a large internal Cycle Storage area is provided with a dedicated entrance on Wicklow Street

The storage area provides space for 74 standard cycles and 4 larger cycles which complies with the recognised best practice requirements for 5% of all spaces to be allocated for use by non-standard cycles. As with the external stands the internal cycle storage stands will be positioned clear of access routes and will be of a contrasted finish to make them more visible for blind and partially sighted people.

Figure: 4 Cycle Storage





## 3.3 Principal Entrances

### 3.3.1 PBSA Entrance

The PBSA student accommodation is accessed from Britannia Street with the entrance, amenities and services located at ground floor level. Figure 5 shows the ground entrances with some of the following features highlighted with regard to accessibility and inclusive design:

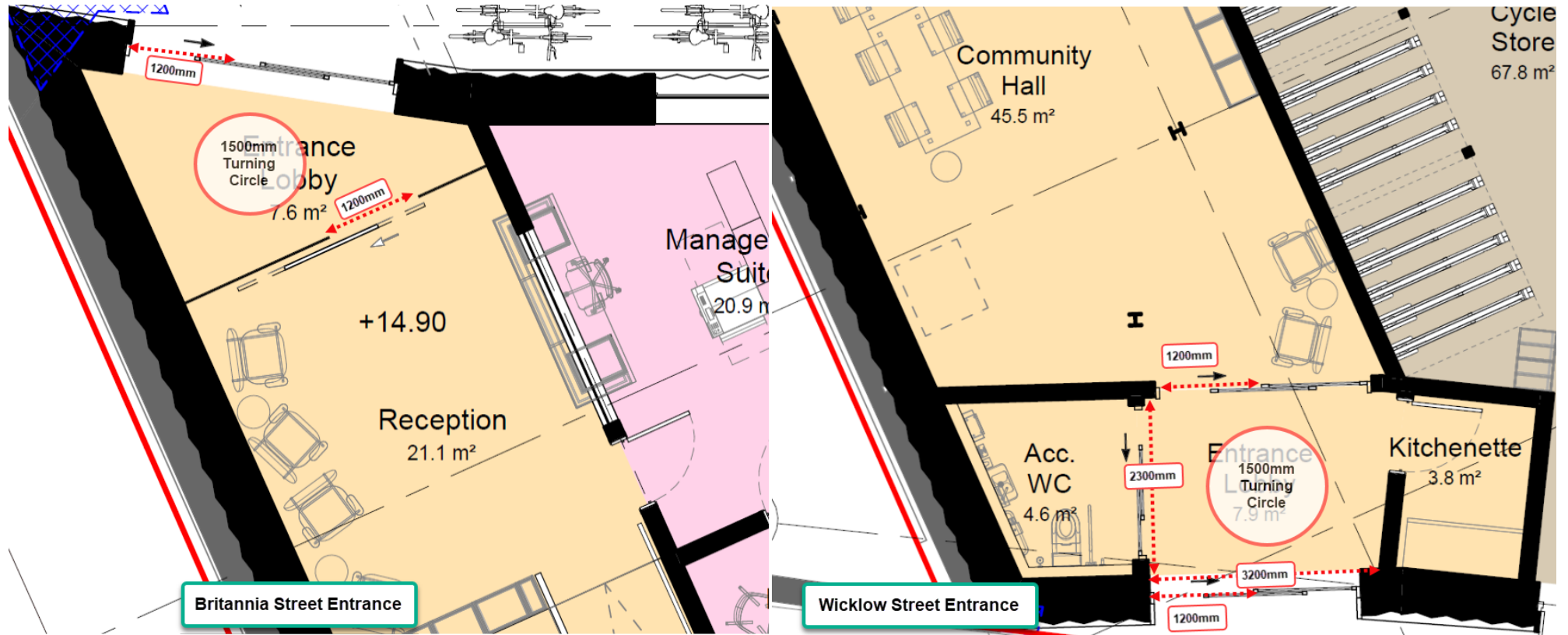
- Weather protection canopy at entrance.
- Contrasted and identifiable entrance doorway within surrounding façade.
- Glazing to be provided with contrasted manifestation at two heights.
- 1200mm door opening width.
- Flush threshold and integrated weather matting to prevent water ingress.
- BS8300 minimum lobby space to provide full access for wheelchair users and mobility scooters.
- BS8300 best practice Automatic sliding door with minimum 12000mm door opening width.

### 3.3.2 Community Entrance

The Community Hall is accessed from Wicklow Street with the entrance, community Accessible WC and Kitchenette located in the lobby area. Figure 5 shows the community entrance area with some of the following features highlighted with regard to accessibility and inclusive design:

- Weather protection canopy at entrance.
- Contrasted and identifiable entrance doorway within surrounding façade.
- Glazing to be provided with contrasted manifestation at two heights.
- 1200mm door opening width.
- Flush threshold and integrated weather matting to prevent water ingress.
- BS8300 minimum lobby space to provide full access for wheelchair users and mobility scooters.
- Accessible WC and kitchenette access available within lobby area.
- BS8300 best practice Automatic sliding door with minimum 12000mm door opening width.

Figure: 5 Principal Entrances

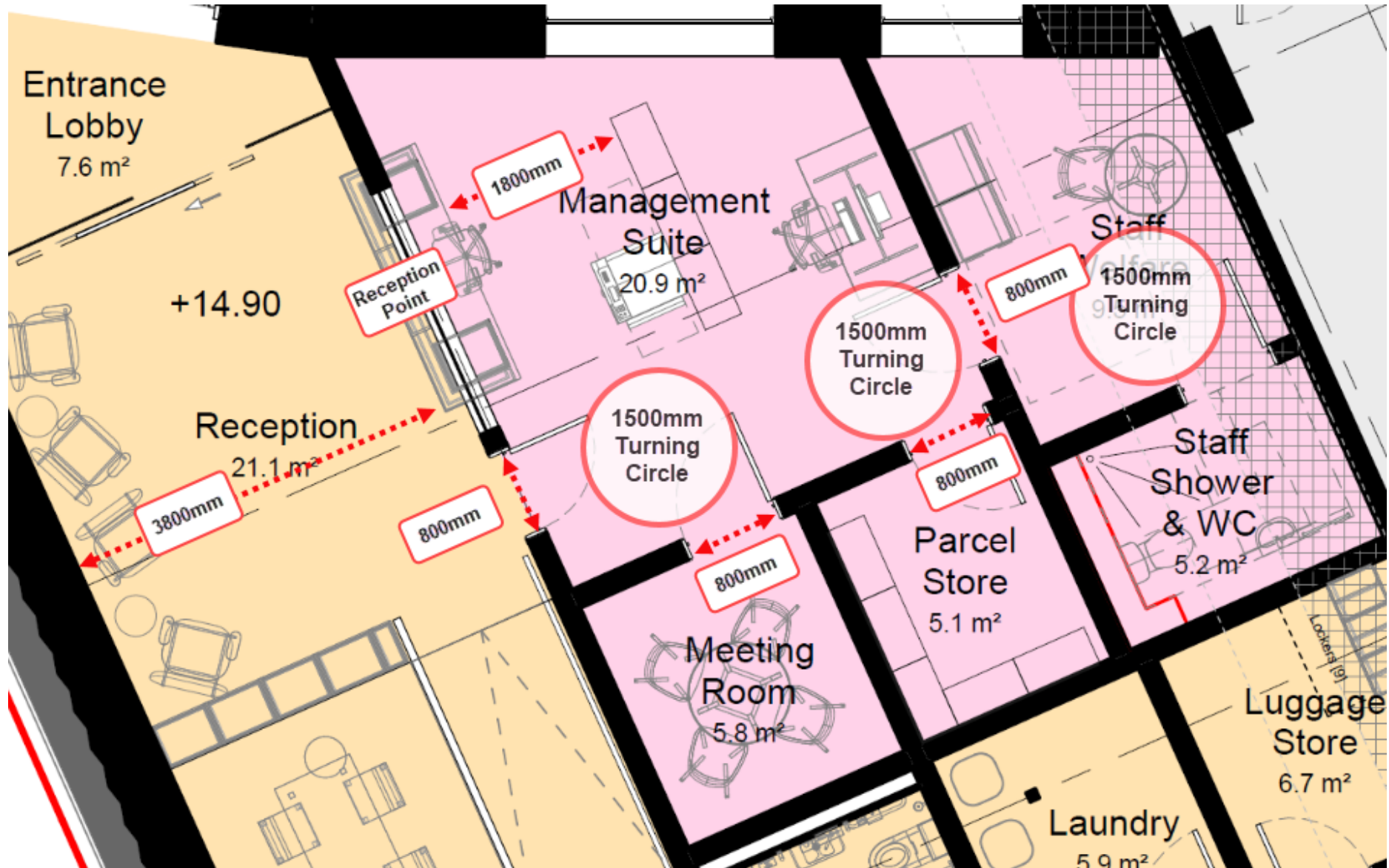


### 3.3.3 PBSA Reception and Management Suite

The PBSA student accommodation is located on the upper levels 1-6 with the reception, amenities and services located at ground level. Figure 6 shows the ground floor areas with some of the following features highlighted with regard to accessibility and inclusive design:

- Reception is clearly visible from entrance.
- Reception point location accommodating full access minimum 1500mm space to staff side and 900mm access to both ends.
- Reception point location accommodating 1500mm space plus additional clear access route on customer side.
- Reception desk to feature surfaces suitable for seated and standing customers, lower height at maximum 760mm for a 1500mm width with 700mm H x 500mm D knee recess beneath.
- Reception desk to feature hearing enhancement system with accompanying signage, management and maintenance procedure.
- Reception desk to be contrasted against surroundings and clearly identified within the foyer space.
- Reception desk background to be plain, non-reflective finish to facilitate lip-reading and alternative communication methods.
- Seating provided for a range of accessible seat heights and is provided both with and without arms and backrests to provide for the widest range of needs.
- Full access and circulation to Management Suite BOH, Staff Welfare and Accessible WC.
- Part M compliant door opening with throughout Management Suite and BOH areas.
- Part M compliant Accessible WC provided to Management Suite with shower for staff.

Figure: 6 PBSA Reception





### 3.3.4 PBSA Student Amenity

The PBSA student accommodation is located within the upper levels 1-6 with some toilets, study space, social areas, amenities and offices located at ground level. Figure 7 shows the ground floor areas with some of the following features highlighted with regard to accessibility and inclusive design:

- Seating provided for a range of accessible seat heights and is provided both with and without arms and backrests to provide for the widest range of needs.
- All staff and student areas served by accessible routes 1200mm width.
- 1 no Part M compliant Accessible WC & Shower provided and available for use by disabled students.
- Comfortable level access into external Courtyard space.
- Comfortable access to laundry and study rooms.
- Laundry room space designed to accommodate comfortable wheelchair user manoeuvrability.
- Laundry room to be specified with equipment at accessible heights.
- Study space configured to allow comfortable wheelchair user manoeuvrability with desk surfaces at a maximum height of 760mm with 700mm H x 500mm D knee recess beneath.
- Part M compliant door opening widths provided and exceeded throughout Student Amenity.

Figure: 7 Student Amenity

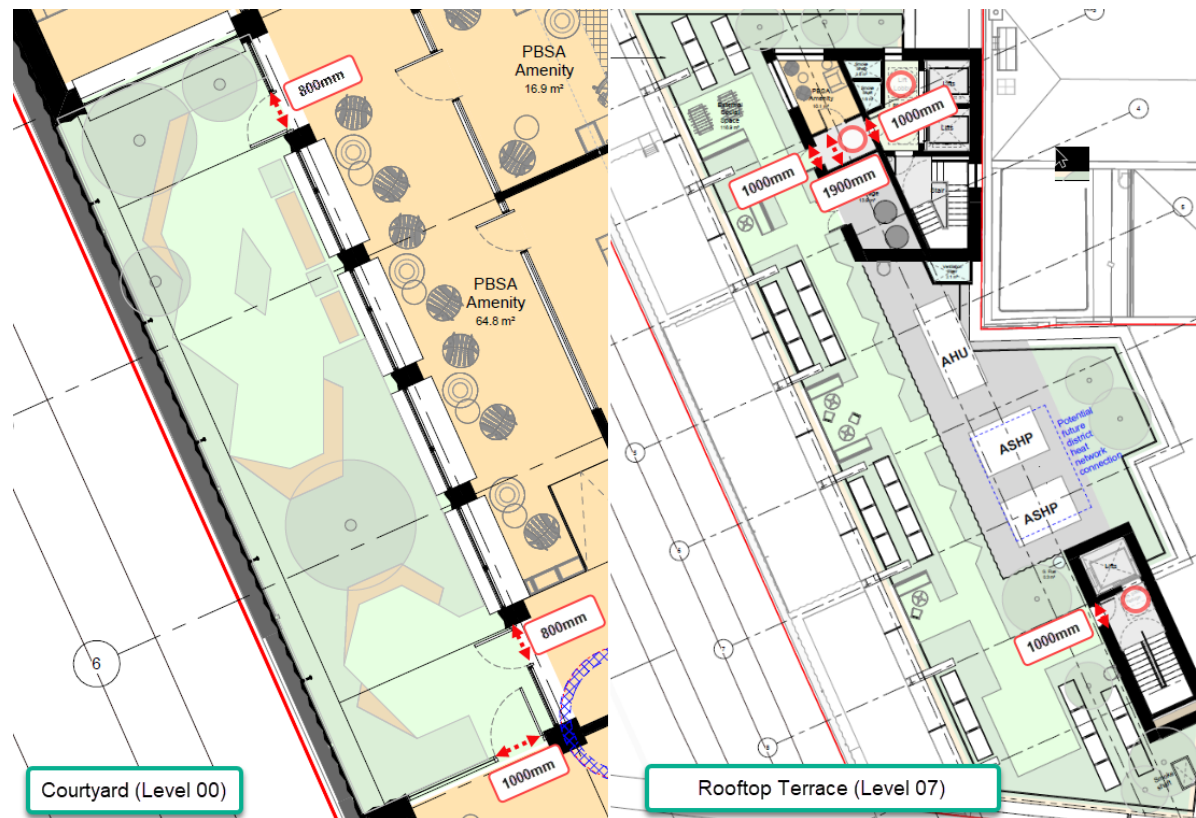


### 3.4 PBSA Student Courtyard & Terrace

#### 3.4.1 Courtyard & Rooftop Terrace

The Courtyard & Rooftop Terrace areas as shown in Figure 8, create green spaces at ground and rooftop levels that are hard landscaped with a firm, level and slip-resistant surface. The Courtyard and accompanying amenity space serves as a space for socialising and lingering in a relaxed environment. The Courtyard provides level access throughout including level access thresholds and transitions at all entry and exist points including a 1000mm opening width door direct from the Community Hall. As with other areas accessible seating at a variety of heights with and without armrests and backrests will be provided.

**Figure: 8** Courtyard & Rooftop Terrace



## 3.5 Vertical Circulation

### 3.5.1 Lifts

There is a total of 3 lifts provided across the site, as shown in Figure 9. All lifts are of a similar approximate 2000mm x 1400mm size that exceeds minimum Part M 1400mm x 1100mm car size requirements and allows the majority of wheelchair users to turn full circle within the lift car.

In accordance with the London Plan and Part B Building regulations 1 no lift in each of the North and South cores are to evacuation lift specification with BS9999 compliant refuge spaces provided in fire protected areas. The proposed development features 3 lifts in accordance with best practice to ensure that lift access to upper floors is continuously available in the event of an unavoidable breakdown or scheduled management and maintenance..

All lifts will include the following regarding design specification for inclusive design and accessibility:

- Clear 1500mm x 1500mm landings and correct level signage.
- Lift car size exceeds minimum and provides 2000mm x 1400mm car size.
- 800mm door opening width and proximity detection on closing with audible announcement of floor arrival and door opening and close.
- Accessible emergency communication with hearing enhancement.
- Fire refuges provided to both North and South lift cores.

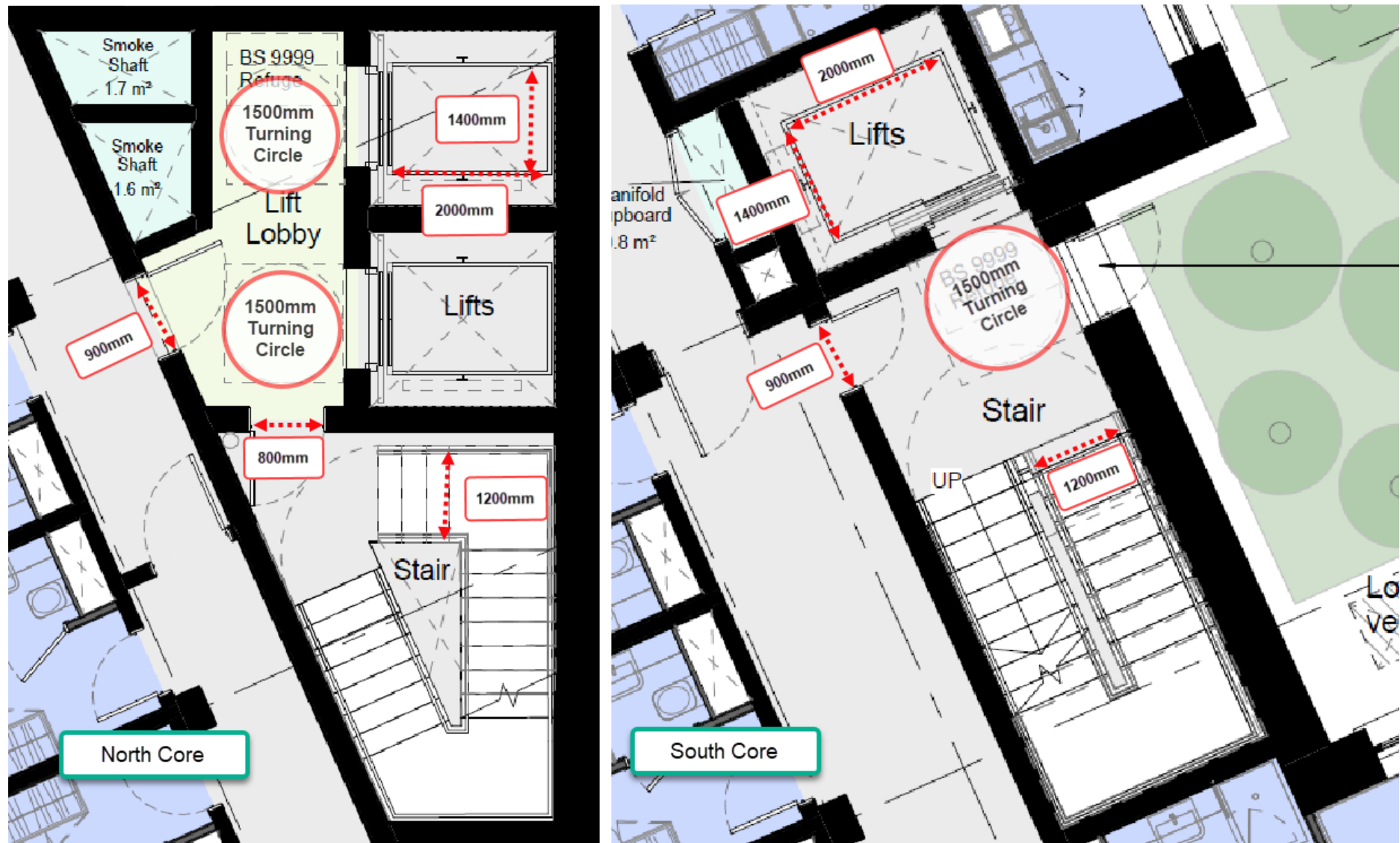
### 3.5.2 Stairs

There is a total of 2 stairways provided, as shown in Figure 9. All stairways provide a 1200mm width. All stairways will include the following regarding design specification for inclusive design and accessibility:

- Closed risers with even treads, risers and overlap.
- No more than 12 risers per flight.
- Nosings that contrast visually with the tread and riser, 50 to 65 mm on the tread, and 30 to 55 mm on the riser.
- Continuous handrails to both sides over stairs and landings at a height of 900mm from pitch line.
- Handrails to be contrasted and spaced from wall and of a profile that allows for comfortable grip.
- Horizontal extensions to be provided at head and foot where they do not project into an access route.



Figure: 9 Lift and Stair Core



### 3.6 Horizontal Circulation

Horizontal circulation, as shown in Figure 10, is provided at a minimum of 1500mm width throughout the scheme with primary access routes, circulation areas and lift landings designed to provide an improved 1600mm – 2000mm width to enhance manoeuvring and turning space for disabled people, particularly for wheelchair users. All access routes serving wheelchair accessible accommodation and associated facilities provide a minimum 1500mm width with restricted widths due to unavoidable structural elements reduced to an absolute minimum of 1000mm.

Figure: 10 Horizontal Circulation



### 3.7 Accessible Student Accommodation (PBSA)

The requirements for accessible PBSA are dictated by Part M Building Regulations, Camden Council Local Plan and Planning Guidance, and the London Plan, as described in 2.2, 2.3 & 2.4.

#### 3.7.1 Proportion of Accessible PBSA

The guidance mentioned above requires the following in accordance with Part M Building Regulations and Camden Planning Guidance:

*“The Building Regulations relevant to the accessibility of new-build student housing are in Approved Document M.....purpose-built student living accommodation should be treated as hotel/ motel accommodation in relation to space requirements and internal facilities, as set out in paragraphs 4.17 to 4.24 of Approved Document M: volume 2. These include a requirement for at least 5% of bedrooms to be wheelchair accessible.”<sup>19</sup>*

The proposed development provides the following as an overall provision of the total PBSA regarding Wheelchair Accessible and Adaptable rooms.

Accessible Room Provision		
<b>Total Rooms</b>	121	100%
<b>Wheelchair Accessible</b>	7	5.8%
<b>With potential soft-spot for adjoining connecting door</b>	7	5.8%
<b>Easily Adaptable</b>	7	5.8%

The Part M Building Regulations and Camden Planning Guidance requirement is exceeded with regard to the provision of wheelchair accessible rooms. Where standard rooms are paired these are considered easily-adaptable of which there are a total 5.8% which represents good provision for potential demand that has taken into account the due regard expected of London Plan requirements and equates to a total capability of 12% or 14/114 rooms wheelchair accessible.

<sup>19</sup> Camden Planning Guidance – Student Housing, 2016, 4.25

### 3.7.2 Locations of Accessible PBSA

All wheelchair accessible and adaptable rooms are located on spacious accessible routes served primarily by the North Lift Core that provides 2x Lifts. Wheelchair accessible rooms are designed to offer choice and flexibility for disabled people by offering:

- A location within comfortable proximity of lift, study and social areas.
- A location with access to green space external areas at Courtyard and Rooftop Terrace.
- All accessible rooms are served by a dedicated kitchen that will feature height adjustable or lowered kitchen worktops. These will include a section of work surface at accessible height including cooker and sink at accessible height with sufficient knee space provided beneath.

### 3.7.3 Wheelchair Accessible & Adaptable Room Specification

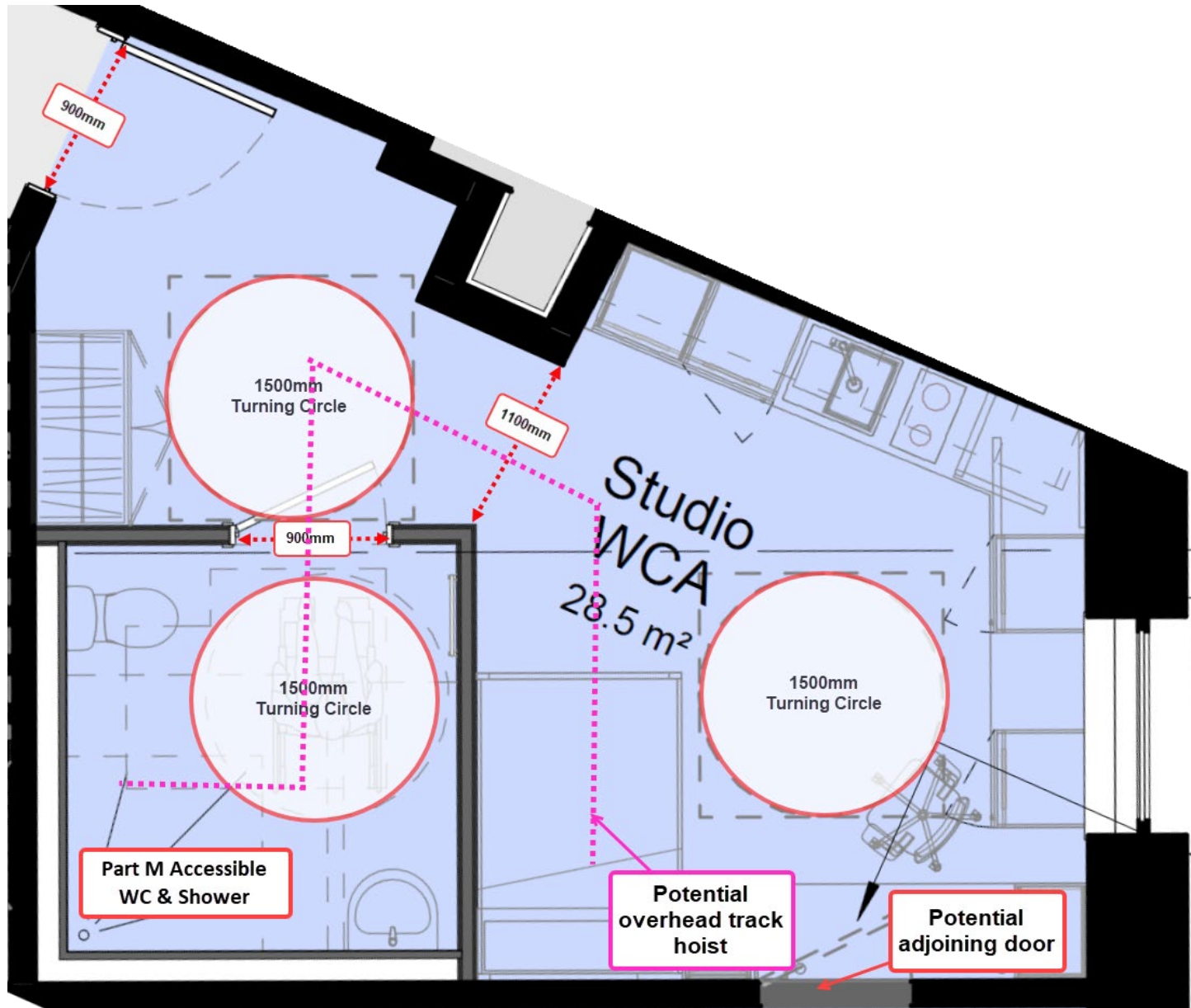
Accessible rooms are designed to provide wheelchair accessible and adaptable rooms with some allowing for adjoining connection directly to a room occupied by a carer or assistant. Accessible rooms are designed to include the following features relating to inclusive design and accessibility.

- GFA between 22m<sup>2</sup> and 34m<sup>2</sup>.
- A minimum 900mm effective clear width Part M compliant door.
- A minimum 1500mm turning and manoeuvring space to one side of the bed.
- Furniture that is moveable and can be relocated to suit individual needs.
- A layout that can accommodate a minimum 700mm to both sides of the bed to accommodate space for 2no assistants/carers.
- Potential layout to accommodate overhead track hoist for assisted living arrangements.
- A choice of layout including either a bath or level access 'wet room' shower facility.
- A choice of layout including WC provision for both left and right-handed transfer from wheelchair.
- All 'wet room' shower facilities and bath facilities specified to BS8300 standard with grab-rails, sanitary-ware, fixtures and fittings.
- Designed with potential soft-spot for installation of direct adjoining door between rooms where required.

The proposed development will provide 7x wheelchair accessible rooms from the outset with the choice of bath or shower, see Figure:11 for typical arrangement. As part of the IAMP a procedure will be put in place by building management to ensure that they are aware of the access requirements of student and any adaptable rooms are altered accordingly in the lead time ahead of the arrival of any student that is a disabled person.



Figure: 11 Wheelchair Accessible Room (Shower 'Wet Room')



### 3.7.1 Visitable Bedrooms

To promote integration and socialising the remaining bedrooms that are not designed to be wheelchair accessible are designed to be visitable. In order to achieve this all rooms feature 800mm door opening widths and are capable of being configured using a flexible furniture layout to provide a 1500mm wheelchair manoeuvring and turning space. Additionally all connecting access routes from lift cores and shared spaces provide a 1500mm minimum width.

### 3.7.2 PBSA Bedroom Types Summary & Additional

This section has provided an overview of the accessible bedrooms provided as part of the proposed development and has shown that the proposal exceeds and complies with the requirements of Building Regulations and Camden Planning Guidance at this early stage. During subsequent detail design stages the following will also be considered and applied to achieve full compliance:

- All fire alarms to include visual indication and audible sounders with the provision of Deaf alert vibrating pagers or pillows considered as part of the IAMP.
- Embossed tactile and Braille signage for key facilities and room numbers.
- Accessible window controls. Automated and/or manual at a height of 800mm – 1000mm.
- Accessible wardrobe 180° door-swing and drawer storage all at accessible heights with contrasted handles capable of being opened using a 'closed-fist' and limited strength and dexterity.
- Emergency assistance alarms operable from bedroom and bathroom that sound at a central control panel that can be monitored and responded to as part of IAMP.
- Fully wheelchair accessible kitchen design.

## 3.8 Emergency Evacuation

The Fire Strategy is developed separately from this Access Statement by the appointed Fire Consultants. The Fire Strategy produced will take precedent over the recommendations of this Access Statement. Regardless of precedent there are some issues relating to emergency evacuation that should be raised with regard to disabled people. The following issues should be considered and developed in further detail during subsequent design stages.

- Any Fire strategy provided should include best practice procedures for the evacuation of disabled people from all parts of the building, including guidance from BS9999:2018 and Regulatory Reform (Fire Safety) Order Supplementary Guidance on Means of Escape for Disabled People.
- Evacuation lifts are provided at all lift cores and are supplemented by appropriately sized refuge areas that should feature carry-down equipment, if required, correct identification signage and EVC (Emergency Voice Communication) two-way system that is accessible to Deaf and partially hearing people.
- Any disabled person as a staff member or student resident at the building must have a Personal Emergency Evacuation Plan (PEEP). The PEEP will be provided in consultation with the individual to ensure that the procedures, assistance and equipment required can be provided to evacuate the individual from the building in the event of an emergency.
- Management procedures will be required to ensure that all staff involved with delivery of services and procedures such as PEEPs receive the required training in relation to the operation of any specialist equipment, moving and handling and disability awareness training. To be included as part of ongoing IAMP.

## 3.9 Decoration & Finishes

At this stage the majority of internal finishes are still to be decided upon. It is important that access issues regarding finishes are raised at an early stage due to the importance of contrast and finishes for disabled people, particularly for Blind and partially sighted people and Cognitively impaired and Neurodiverse people. The following issues from BS8300-2:2018 should be considered during subsequent detail design stages:

- People who are blind or partially sighted, and people who have neurological processing difficulties, might be confused by bold patterns used in wall coverings, as they distort the perception of distance. Large, repeating patterns that incorporate bold, contrasting colours should not be used for the wall surfaces in parts of a building where visual acuity and stress reduction are critical.
- Very shiny finishes should be avoided due to problems with glare and the fact that they are perceived as being slippery even when they have a slip-resistant surface. Large, repeating patterns that incorporate bold contrasting colours or simulate steps should not be used for any floor surface.
- To assist people in navigating and negotiating an environment, sufficient levels of visual contrast should be achieved. All internal doors should be identifiable and contrast visually with the surrounding wall and floor finishes, achieving a difference of at least 30 points in LRV.
- Door opening furniture should contrast visually with the surface of the door which it operates, achieving a difference of at least 15 points in LRV.
- The surface of the leading edge of any door that is not self-closing, or is likely to be held open, should contrast visually with its surroundings, achieving a difference of at least 30 points in LRV.
- The LRV of a wall should be 30 points different from that of the ceiling and of the floor. To avoid giving the wrong impression about the size of a room, skirtings should have the same LRV as the wall so that the junction between the skirting and the floor marks the extent of the room, except where coved skirtings are used, where the skirting should have the same LRV as the floor and should extend not more than 100 mm above finished floor level.



## 3.10 Student Amenity Spaces

The design team for the proposed development and the client and building management and operations team all have responsibilities under the Equality Act 2010 (EA) due to the buildings offering services and being owned and managed by an education provider, see 2.1. The design team must provide built environment spaces that provide the facilities for the client and building management to meet their obligations under the EA. The operator has a duty to anticipate the requirements of disabled people as staff, resident students or visitors and the design of the proposed development will help to ensure that this duty is met by meeting accessible design guidance standards.

At this stage the proposed development on plan meets the requirements of Part M Building regulations and is anticipated to meet the Camden Local Plan and Planning Guidance and applicable BS8300 guidance during subsequent detail design stages.

### 3.10.1 Circulation

Accessible circulation routes are provided throughout all areas connecting student amenities, bedrooms, social, study and external areas. Widths are 1500mm minimum for all primary routes with no access route present with a width below 1200mm.

### 3.10.2 Seating and Tables

Seating will be provided throughout the development at a range of accessible heights, ranging from 350mm – 550mm, both with and without arms and backrests and located to allow wheelchair user transfer and positioning alongside. Seating will be visually contrasting and set back from the access routes across these spaces.

Table heights will be a maximum height of 760mm allowing for 700mm H x 500mm D knee recess beneath to accommodate wheelchair users. Tables will be visually contrasting.

### 3.10.3 Room and Furniture Management

To provide flexibility furniture will be interchangeable and movable to allow furniture items to be moved to accommodate individual needs as part of the ongoing IAMP. This will allow amenity spaces, kitchens, social areas and bedrooms to accommodate revised layouts to meet additional space requirement for disabled people. It will also allow for standard furniture items to be easily removed to allow specialist beds, chairs or desks to replace them.

A more flexible arrangement to room allocation can allow for spaces to be allocated to be gender specific or to create quieter spaces as prayer rooms or calm rooms as recovery space for cognitive & neurodiverse disabled people.

## 4 Conclusion

The proposed development at the Britannia Street site is at an early stage. The design as proposed on plan has been reviewed by the access consultant and has been found to incorporate the principles of inclusive design as a general requirement. The design has also incorporated the design guidance included and stipulated by the Camden Council Local Plan and Camden Planning Guidance, Approved Document Part M Building Regulations Vol 2 and applicable parts of BS8300 1 & 2 - Design of an accessible and inclusive built environment 2018.

The most notable features with regard to inclusive design and accessibility are as follows:

- Community access and community space featuring dedicated Accessible WC provision, Kitchenette and external Courtyard access.
- Best practice 5.8% wheelchair accessible room provision that exceeds minimum Part M requirements with all rooms designed to provide flexibility regarding choice of layout and location.
- Best practice additional 5.8% additional adaptable wheelchair accessible room provision to provide for potential future demand.
- Choices of sanitary arrangements in accessible bedrooms providing for bath and shower use potential design for connecting rooms for carers and assistants
- Generous circulation space throughout all internal areas providing 1500mm width access routes throughout all primary circulation routes.
- Accessible external areas at Courtyard ground level and Rooftop Terrace to provide quiet green spaces of calm for refuge, socialising and lingering.
- Visitable rooms provided throughout to promote social integration with accessible door opening widths and wheelchair spaces accommodated within flexible furniture arrangements.

The proposed development provides a high standard of inclusive design both externally and internally within the PBSA student accommodation and commercial areas. This Access Statement raises numerous detail design issues to be addressed and incorporated as the detail design is developed. The design team are committed to the principles of inclusive design and will adopt accessible design changes and continue to ensure that the development realises the high standards and compliance shown at this initial stage.

As Access Consultants Direct Access are confident that the development will provide an accessible and inclusive environment that meets regulatory compliance and planning requirements and will provide accessible student accommodation and community facilities for physically, sensory and cognitive & neurodiverse disabled people.

# END