

Access Statement

4.1 INTRODUCTION

4.1.1 PURPOSE OF THE REPORT

This report is an update to the Access Statement prepared by DBA in July 2017 as part of the original permission (ref: 2017/3847/P) and the Access Statement Addendum prepared by DBA in July 2020 in support of S73 permission (ref: 2020/3116/P), granted planning consent in December 2020. The current planning permission was granted in March 2023 (ref: 2022/3646/P). This report focuses on the proposed amendments only, and should be read in conjunction with the aforementioned Access Statements.

This Access Statement Addendum is based on a review of the proposals by Allies and Morrison and Piercy & Co Architects for Blocks C, D, E1, E2 and F as part of the Proposed Development.

4.1.2 METHOD OF REVIEW

This Access Statement Addendum describes the access provisions using a journey around the Proposed Development as follows:

- Arrival at the Site;
- Approaches to the buildings;
- Entrance ways;
- Horizontal and vertical circulation;
- Access to facilities;
- Typical residential layouts;
- Sanitary provision; and
- The emergency evacuation strategy.

Step-free external and internal routes, lifts, stairs, WCs and other access features are highlighted on access overlays throughout this Access Statement Addendum.

The statement does not describe or evaluate any part of the Proposed Development that is used solely for inspection, repair or maintenance of any service or fitting, in accordance with Approved Document M. If a disabled person requires access to these areas as part of their work then their employer is expected to take all reasonable steps to ensure that there are no barriers to them carrying out their work. Any building adjustments that are required would be carried out at that time.

This Access Statement Addendum describes how the scheme has been progressed with consideration of the principles of inclusive design.

The report considers the requirements of all users, residents, visitors, staff and wider community including:

- People with mobility impairments;
- People with vision impairments;
- People with neuro-diverse requirements;
- Deaf people;
- Older people; and
- Small children.

The meaning of ‘disabled’ in this Access Statement Addendum is as defined by Equality Act 2010.

4.1.3 THE STANDARDS AND POLICY

The access provisions are reviewed against the access regulations and standards that apply, which are identified below:

National Regulations

- *The Building Regulations 2010, Approved Document M (Access to and use of buildings) Volume 1: Dwellings, HM Government, 2015 edition incorporating 2016 amendments. (Hereafter referred to as AD M Vol.1).*
- *The Building Regulations 2010, Approved Document M (Access to and use of buildings) Volume 2: Building other than dwellings, HM Government, 2015 edition incorporating 2020 and 2024 amendments. (Hereafter referred to as AD M Vol.2).*
- *The Building Regulations 2010, Approved Document K (Protection from falling, collision and impact), HM Government, 2013 edition. (Hereafter referred to as AD K).*
- *The Building Regulations 2010, Approved Document B (Fire safety) Volume 1: Dwellings, HM Government, 2019 edition incorporating 2020 amendments. (Hereafter referred to as AD B Vol.1).*
- *The Building Regulations 2010, Approved Document B (Fire safety) Volume 2: Buildings other than dwellings, HM Government, 2019 edition incorporating 2020 and 2022 amendments. (Hereafter referred to as AD B Vol.2).*
- *The Building Regulations 2010, Approved Document T (Toilet accommodation), HM Government, 2024 edition. (Hereafter referred to as AD T). AD T took effect on 01 October 2024.*

Best Practice

- *British Standard 8300:2018 Design of an Accessible and Inclusive Built Environment: BS8300-1 - External Environment Code of Practice. BS8300-2 - Buildings Code of Practice.*
- *British Standard 9999:2017 Code of Practice for Fire Safety in the Design, Management and use of Buildings, British Standards Institution, 2017.*

National Planning Policy

- *National Planning Policy Framework (NPPF), Ministry of Housing, Communities & Local Government, 2024.*

London Planning Policy

- *The London Plan: Spatial Development Strategy for Greater London, Mayor of London, March 2021.*

The London Plan (2021) is part of the statutory development plan for London, meaning that the policies in the Plan should inform decisions on planning applications across the capital. Relevant policies relating to access and design standards are summarised in the SPG guidance below.

- *Social Infrastructure Supplementary Planning Guidance May 2015, London Plan 2015 Implementation Framework, GLA, 2015.*
- *Shaping Neighbourhoods Accessible London: Achieving an Inclusive Environment Supplementary Planning Guidance, London Plan 2011 Implementation Framework Mayor of London, October 2014.*

Residential Planning Policy

- *Housing Supplementary Planning Guidance, London Plan 2016 Implementation Framework, March 2016.*

Local Policy

- Camden Local Plan, June 2017.
- Access for All - Camden Planning Guidance, March 2019.
- Housing - Camden Planning Guidance, January 2021.
- Public Open Space - Camden Planning Guidance, January 2021.
- Transport - Camden Planning Guidance, January 2021.

A full list of references and description of relevant legislation, regulations, standards and guidance are detailed at the end of this Access Statement.

Approved Documents M, K and BS 8300:2018 provide general access advice, but refer to other standards and regulations about specific aspects of buildings and their immediate surroundings. Therefore, several separately authored documents are referred to, including good practice guidance books written by specialists. Refer to Appendix 1A at the end of this document for more details.

There are no national regulatory controls governing extended external spaces and landscaping other than Best Practice Guidance. For primary routes and approaches to buildings Approved Documents M are taken as a bench mark for determining accessibility. With regards to streetscape and pavement design, guidance is provided by the Department for Transport's Inclusive Mobility Guide and Transport Notes and BS8300:2018, Part 1: External Environments.

Access standards are in a continuing state of development because of changing expectations and legislation. The nature of these changing requirements and standards can result in anomalies and contradictions. Therefore it is important that access and inclusivity are considered and refined throughout the design process. The design of the scheme should seek to interpret these standards to provide the best possible level of inclusive design and this Access Statement Addendum describes situations and solutions where interpretation may be necessary.

4.2 OVERVIEW OF PROPOSALS

4.2.1 SUMMARY OF ACCESS PROVISIONS

The key access provisions for the Proposed Development include:

- Incorporation of the principles for inclusive design;
- Proposed Development upgraded to meet current legislation, policy and design standards;
- Accessible routes to all connections with local pedestrian routes and public transport;
- Two external public lifts to tackle existing differences in level and provide step-free access across the Site;
- A pedestrian priority area with a level surface area and restricted vehicular traffic for comfortable use by residents and local people;
- New public realm and landscaped spaces designed for comfortable use by residents and local people.
- Provision of 18 accessible blue badge car parking bays for residential use;
- Provision of 250 parking bays for the store with 15 (6%) accessible parking bays;
- Provision of accessible cycle parking;
- Wheelchair-accessible sanitary facilities to serve workplace commercial units;
- Step-free access to all parts of the buildings, including balconies and roof terraces (lift provision in Block F office units will be made by the tenant);
- 572* dwellings which is 90% of total number of 637 dwellings designed in accordance with Building Regulation requirement M4(2) (*with the exception of 12 homes that do not have step-free access to the dwelling as agreed with LBC as part of the original June 2018 planning permission (ref: 2017/3847/P));
- 65 dwellings which is over 10% of 637 dwellings designed in accordance with Building Regulation requirement M4(3);
- Access to a second lift for all residents of wheelchair accessible homes at upper levels; and
- Emergency evacuation strategy for disabled people to include an evacuation lift per core.

4.2.2 CONCLUSION

Each aspect of arriving, entering and using the buildings has been carefully considered during the design process, including activities within individual homes.

The design proposals at this stage demonstrate the potential for the finished scheme to achieve a high level of inclusive design for the Camden Goods Yard mixed use development and associated public realm. This is with respect to compliance with Approved Document Part M -Volumes 1 and 2- and the requirements of the London Plan, and takes into account current legislation, policy and design standards updated since the extant scheme was granted planning permission.

DBA has reviewed the proposed amended scheme against the extant scheme (and subsequent approved s73 planning applications on the main site parcel) and concluded that the proposed amendments have not significantly changed the conclusions reached previously in relation to inclusive design.

4.3 ARRIVAL

4.3.1 CAR PARKING

Residential parking

As per the extant scheme agreed with LBC and TfL, the residential scheme will be car-free, with the exception of

18 accessible car parking spaces provided exclusively for wheelchair housing residents and employees within the CGY site (and 2 Car Club spaces).

11 accessible bays will continue to be provided within Block F under croft parking and 7 on-street bays (7 of which will be accessible) will be provided on Engine House Way and Winding Vaults Way. The provision of 18 accessible parking bays will continue to cater for 3% of the total number of homes, in line with the London Plan 2021.

As per the extant scheme, residential accessible parking will be managed and allocated based on demand arising from Wheelchair Accessible homes, monitored through a Car Parking Management Plan secured through the Phase 3 Car Parking Management plan secured as part of the CGY S106 Agreement. The accessible bays will be allocated to minimise the distance between the bay and the wheelchair homes.

Accessible car parking spaces will continue to meet dimensional and other specifications as set out in Approved Document Part M and local authority requirements.

4.3.2 CYCLE PARKING

A total of 1,099 secured residential cycle parking spaces (previously 1,054) will be provided at the Main Site for residents use at ground floor and/or basement level of buildings, in secure and sheltered locations. 32 residential short-stay cycle parking spaces (previously 24) will be provided in the public realm.

At least 5% of residential cycle parking will be accessible single tier spaces, exceeding London Cycle Design Standards guidance, and some spaces will be larger to accommodate larger, adapted cycles or bicycles used by disabled cyclists.

Commercial cycle parking provision remain unchanged.

Approaches to accessible cycle parking will be step-free along wide corridors. Routes to cycle stores are described in each building section.

4.4 BLOCK C

4.4.1 OVERVIEW

The proposed amendments for Block C are as follows:

- Insert second stairs to comply with the latest fire safety guidelines for residential buildings.
- External balconies added to east elevation in response to insertion of second stairs.
- Extension of terrace on 4 homes which previously had inset balconies.
- Minor reduction in block height from 73,950mm (AOD) to 73,350mm (AOD) due to floor-to-floor height reduction from 3,1500mm to 3,075mm.
- Level changes around the building adressed with internal ramps along escape routes at ground floor.
- Cycle store accessed externally only.
- Communal residential entrance reduced from two doors to one door.
- Minor change to approved residential mix.

4.4.2 RETAIL, OFFICE AND WORKSPACE UNITS

The single-storey commercial office at ground floor remains unchanged. One retail and four workspace units will continue to be provided at ground floor within Block C enclosure.

Entrances will continue to meet AD M standards for public access. Glazing has been set back to provide weather protection over the entrances.

The commercial office will be delivered to Cat A fit-out; the four workshop units will be delivered as shell and core and the future tenant will be responsible of the internal arrangement and provision of WC facilities.

4.4.3 RESIDENTIAL USE

Entrances

The residential entrance will be amended to provide one set of double doors (previously two). The entrance will continue to meet AD M standards for residential access.

A new post room is proposed at ground floor, accessed from the residential lobby, and will be designed to accommodate all users (including suitable wheelchair manoeuvring space).

Circulation

Internal ramps have been introduced on ground floor escape routes to accommodate changes of level around the building. Any internal ramps will be designed to meet AD K guidance including, but not limited to, the provision of intermediate landings, tonally contrasting handrails where required, tonally contrasting ramp and landing surfaces.

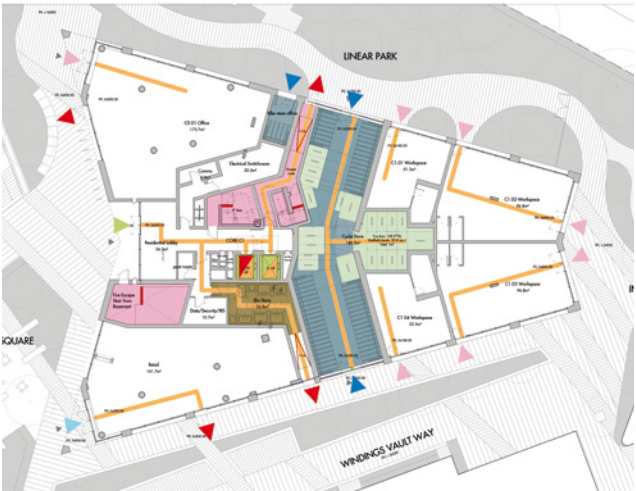
An additional stair has been provided to meet current fire regulations, resulting in every floor being served by two internal stairs. All stairs will be designed to meet the requirements of Part K for ‘general access stair’, and will be detailed at a later stage. The lift core remains unchanged and will continue to provide two lifts to all floors.

Cycle store

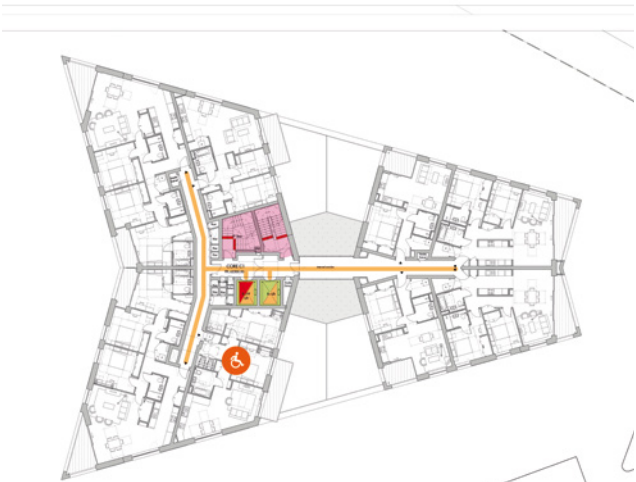
The cycle store has been reconfigured, now providing external access only.

Refuse stores

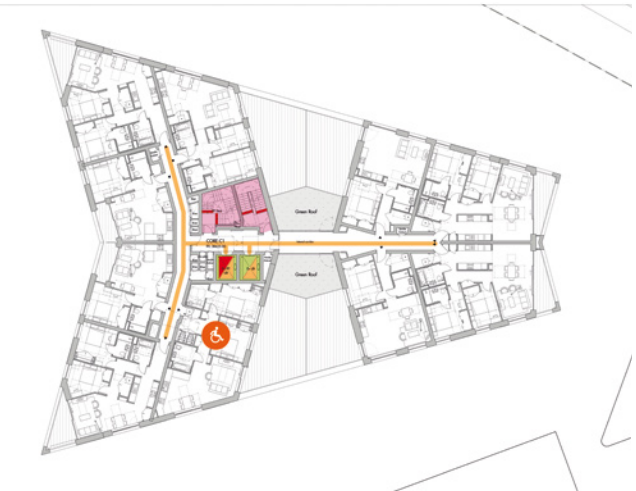
The refuse store will be maintained at ground floor, with internal access for residents from the residential lobby.



Ground floor



Floor 09



Floor 01



Floor 10

- external wheelchair accessible route
- internal wheelchair accessible route
- residential accessible entrance
- office accessible entrance
- retail / community accessible entrance
- accessible emergency exit
- cycle entrance
- vehicle entrance
- stepped entry / exit
- passenger lift
- passenger / fire-fighting lift
- passenger / evacuation lift
- accessible WC
- accessible WC/shower
- WC/shower/changing rooms
- cycle parking
- accessible cycle parking
- step
- escape stairs
- safe refuge
- ramp (≤ 1:20)
- gradient (≥ 1:21)
- wheelchair accessible room
- waste storage

4.5 BLOCK D

4.5.1 OVERVIEW

- The proposed amendments for Block D are as follows:
- Minor reduction in block height from 54,300mm (AOD) to 53,900mm (AOD) due to floor-to-floor height reduction from 3,150mm to 3,075mm.
 - Minor change to block elevation arising from fire safety compliance.
 - Second lift added to serve all homes at upper levels.
 - New communal roof terrace for residents at level 05 with step-free access via one lift.
 - Change to approved residential mix to include M4(3) wheelchair user homes at upper levels.

4.5.2 RETAIL USE

The retail / community units proposed at ground floor remain largely unchanged.

The retail unit to the west continues to provide a shower, but it has been enlarged to meet AD M Vol. 2 standards for wheelchair-accessible WC/shower compartments.

These units will be delivered as shell and core and the future tenant will be responsible for the internal arrangement.

4.5.3 RESIDENTIAL USE

Entrances

The residential entrances remain largely unchanged, with minor amendments to the south communal entrance which do not affect accessibility.

Circulation

An additional lift has been provided to serve all homes accessed at levels 01-04. All lift cars will be designed for eight or more people, with a minimum internal car size of 1100 mm x 1400 mm (the minimum dimensions for AD M Vol. 1). All lift doorways will provide a minimum clear opening width of 900 mm and there will be a clear landing of at least 1500 mm x 1500mm in front of all lift entrances.

Cycle store

A new accessible cycle store is proposed on the private, gated garden to the rear of the building.

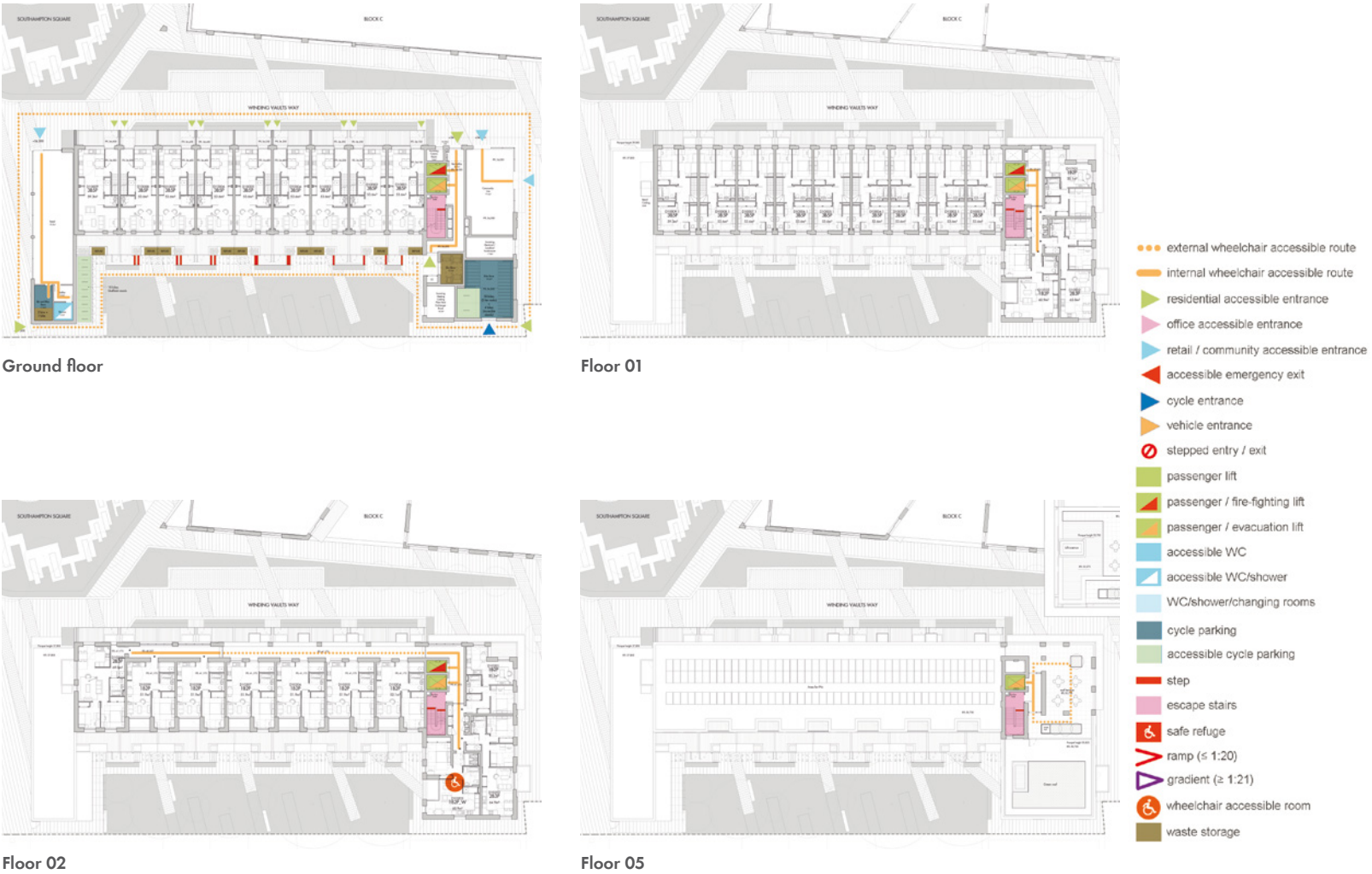
Refuse stores

The refuse store will be maintained at ground floor, but has been amended to provide external access only.

The horizontal distance between any dwelling and its refuse collection point will be less than thirty metres to ensure compliance with Part H of the Building Regulations (otherwise to be discussed with Building Control).

Emergency egress

An evacuation lift will be provided for the evacuation of disabled users from all floors, including the rooftop terrace.



4.6 BLOCK E1

4.6.1 OVERVIEW

- The proposed amendments for Block E1 are as follows:
- Marginal increase to block footprint (0.5m on the east, west, north elevations) to accommodate secondary staircase.
 - Minor reduction in block height from 73,375mm (AOD) to 70,400mm (AOD) due to floor-to-floor height reduction from 3,375mm to 3,075mm.
 - Relocation of Morrisons emergency escape stairs within Block E1 to external location between E1 and E2.
 - Residential reception point and accessible WC have been removed.
 - Residential core reconfigured to accommodate secondary staircase.

4.6.2 RETAIL USE

Entrances will continue to meet AD M standards for public access. Glazing has been set back to provide weather protection over the entrances.

Retail space will be delivered as shell and core and the future tenant will be responsible for the internal arrangement.

4.6.3 RESIDENTIAL USE

Entrances

The communal residential entrance will continue to meet AD M standards for residential access.

The residential reception point and associated accessible WC have been removed.

Circulation

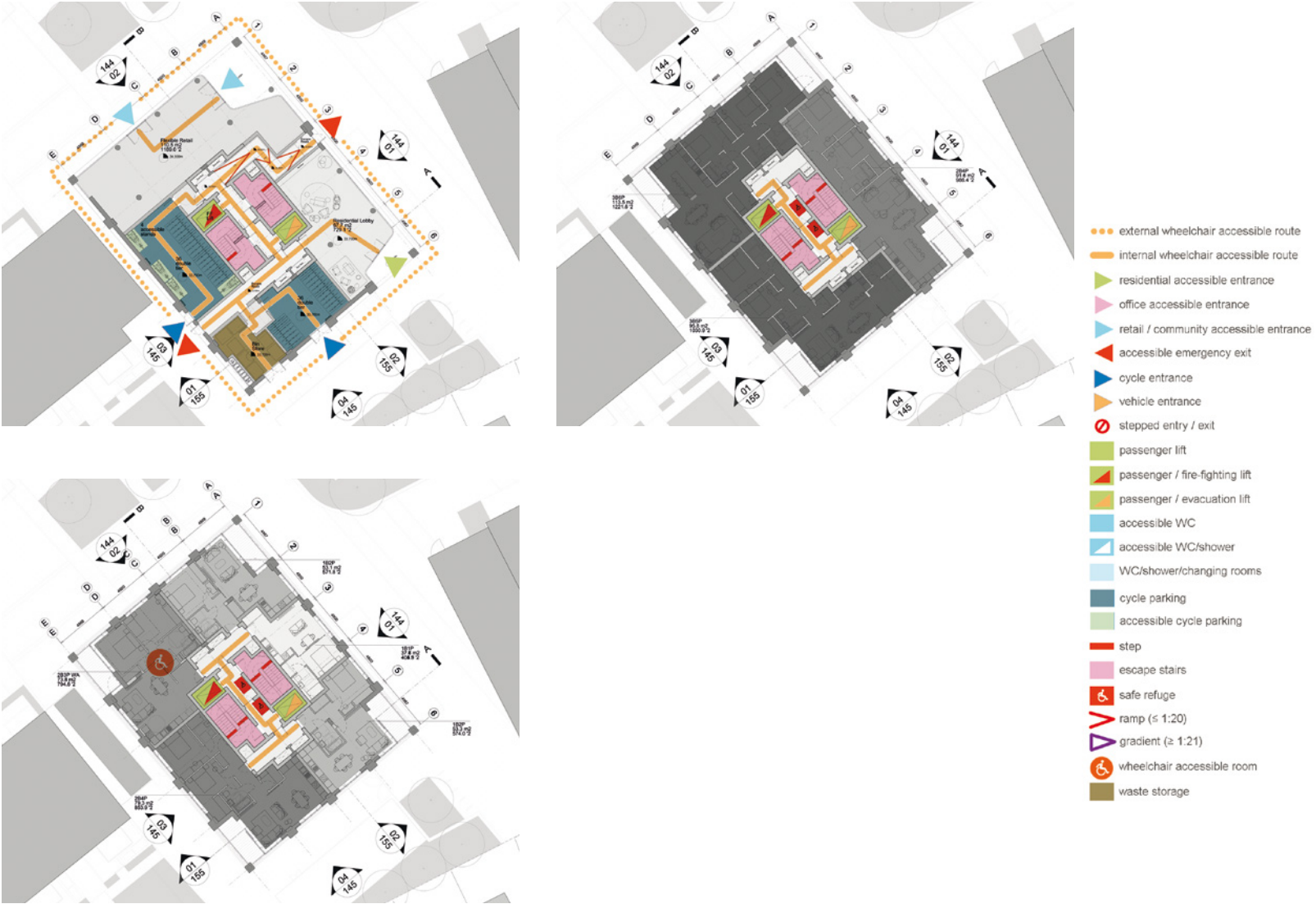
An additional stair has been provided to meet current fire regulations, resulting in every floor being served by two internal stairs. All stairs will be designed to meet the requirements of Part K for ‘general access stair’, and will be detailed at a later stage.

The lift core has been re-configured but continues to provide two lifts to serve all residential floors. All lift cars will be designed for eight or more people, with a minimum internal car size of 1100 mm x 1400 mm (the minimum dimensions for AD M Vol. 1). All lift doorways will provide a minimum clear opening width of 900 mm and there will be a clear landing of at least 1500 mm x 1500mm in front of all lift entrances.

A series of internal ramps have been introduced on the north escape route at ground floor, to accommodate changes of level around the building. Any internal ramps will be designed to meet AD K guidance including, but not limited to, the provision of intermediate landings, tonally contrasting handrails where required, tonally contrasting ramp and landing surfaces.

Emergency egress

An evacuation lift will be provided for the evacuation of disabled users from all floors.



4.7 BLOCK E2

4.7.1 OVERVIEW

The proposed amendments for Block E2 are as follows:

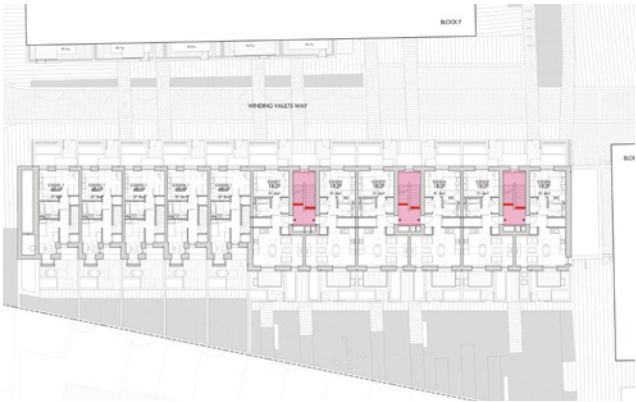
- Minor reduction from 52,950mm (AOD) to 52,200mm (AOD) for G + 4 storeys section of the block. For G + 2 storeys section of the block minor reduction from 45,450mm to 45,075mm block height. This is due to a reduction in floor-to-floor heights from 3,150mm to 3,075mm.



Ground floor

4.7.2 RESIDENTIAL USE

The residential building remains largely unchanged, with minor amendments which do not affect accessibility.



Floor 02

- external wheelchair accessible route
- internal wheelchair accessible route
- ⛔ stepped entry / exit
- accessible cycle parking
- step
- escape stairs
- waste storage

4.8 BLOCK F

4.8.1 OVERVIEW

The proposed amendments for Block F are as follows:

- Insert second stairs to accord with requirements of fire safety guidelines for residential buildings.
- Minor reduction of block height due to floor to floor height reduction from 3,150mm to 3,075mm. Reduction of AODs for tallest aspect of the block are 73,875mm to 72,075mm (AOD). AODs for each core as follows:
 - Block F1: 68,213mm (AOD) to 67,914mm (AOD)
 - Block F2: 73,875mm (AOD) to 72,075mm (AOD) for G+10 storeys section of the block. 60,606mm (AOD) to 58,785mm (AOD) for G+6 storeys section of the block.
 - Block F3: 64,410mm (AOD) to 64,035mm (AOD) for G+6 storeys section of the block. 54,050mm (AOD) to 53,551 (AOD) for G+4 storeys of the block.
- Minor change to approved residential mix.

4.8.2 RETAIL, OFFICE AND WORKSPACE UNITS

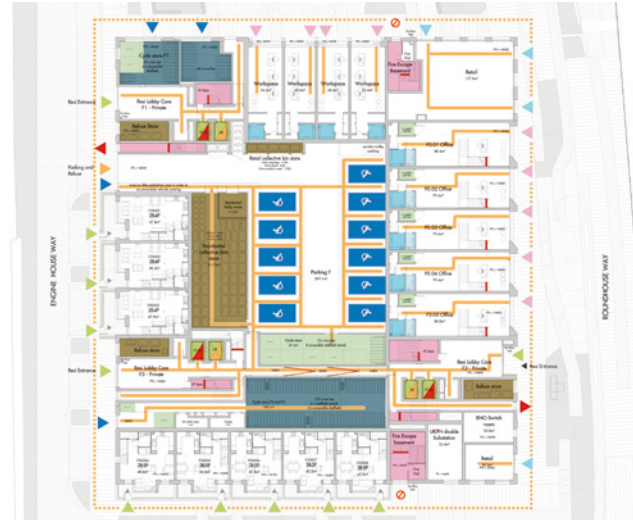
The commercial units remain largely unchanged, with minor amendments which do not affect accessibility.

4.8.3 RESIDENTIAL USE

Circulation

An additional stair has been provided in each of the three cores to meet current fire regulations, resulting in every floor being served by two internal stairs. All stairs will be designed to meet the requirements of Part K for 'general access stair', and will be detailed at a later stage. The lift cores remain unchanged and will continue to provide two lifts to all floors.

4.9 ACCESSIBLE HOUSING



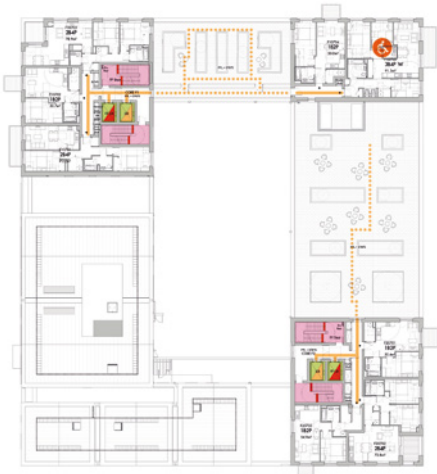
Ground floor



Floor 05



Floor 01



Floor 07

- blue badge parking
- external wheelchair accessible route
- internal wheelchair accessible route
- residential accessible entrance
- office accessible entrance
- retail / community accessible entrance
- accessible emergency exit
- cycle entrance
- vehicle entrance
- stepped entry / exit
- passenger lift
- passenger / fire-fighting lift
- passenger / evacuation lift
- accessible WC
- accessible WC/shower
- WC/shower/changing rooms
- cycle parking
- accessible cycle parking
- step
- escape stairs
- safe refuge
- ramp (≤ 1:20)
- gradient (≥ 1:21)
- wheelchair accessible room
- waste storage

The amended scheme will provide 7 less homes, which will make a total of 637 units distributed across six buildings throughout the site.

The amended scheme will continue to meet the requirements of the London Plan 2021 providing ninety per cent of the homes (572* out of 637) designed to meet Building Regulation requirement M4(2) ‘accessible and adaptable dwellings’ .

Over ten per cent of the homes (65 out of 637) designed to meet Building Regulation requirement M4(3) ‘wheelchair user dwellings’.

All 65 M4(3) homes will be Wheelchair Adaptable homes, designed to meet Building Regulation requirement M4(3)(2) (a) to allow a simple adaptation of the dwelling to meet the requirements of occupants who use wheelchairs.

Wheelchair user dwellings will be distributed across tenure type, size and level in Blocks B, C, D, E1 and F.

The proposed housing mix is as follows:

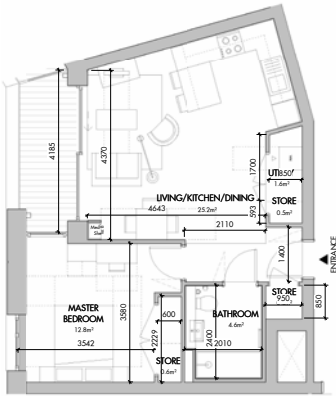
Beds	Cat 2	Cat 3	Totals
Studio	46	11	57
1B	238	9	247
2B	215	24	239
3B	68	21	89
4B	5	0	8
Totals	572*	65	637

Cat 2 = Category 2 unit according to BR M4(2);

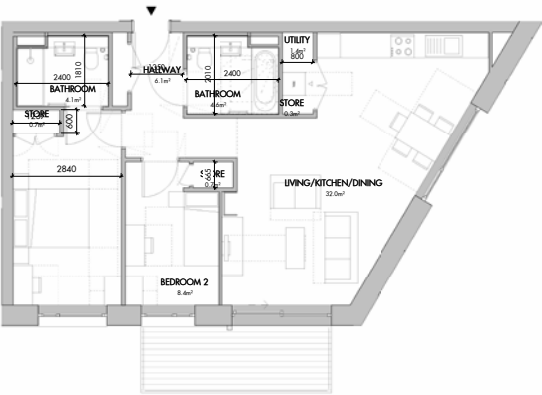
Cat 3 = Category 3 unit according to BR M4(3).

*As per the extant scheme, a total of 12 units will meet all M4(2) requirements with the exception of not providing step-free access to the dwelling, as agreed with LBC as part of the original June 2018 planning permission (ref: 2017/3847/P) on the grounds of viability and loss of dwelling type diversity. These units are all in Block E2, 6 single storey units at second floor and 6 duplex units between third and fourth floors, accessed at third floor of Block E2.

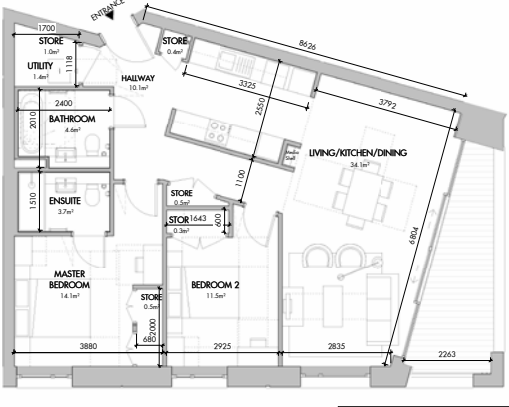
A selection of units have been reviewed. These are taken to be representations of all units in the scheme, samples of which are included in this Access Statement Addendum.



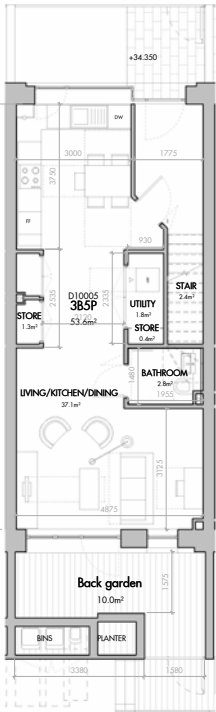
Typical M4(2) layout - 1B2P (Block C)



Typical M4(2) layout - 2B3P (Block C)



Typical M4(2) layout - 2B4P (Block C)



Typical M4(2) layout - 3B5P (Block D)



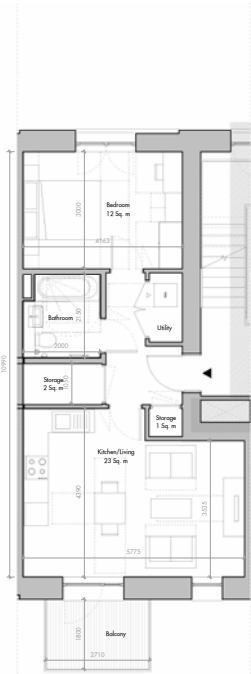
Typical M4(2) layout - 1B2P (Block D)



Typical M4(3) layout - 1B2P (Block D)



Typical M4(2) layout - 4B6P (Block E2)



Typical M4(2)* layout - 1B2P (Block E2)