

Access Appraisal for Planning Application King's Cross Station Enhancement

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1. SCOPE OF WORK

- 1.1 The purpose of this submission is to appraise accessibility within design of the planning submission by Network Rail through proposals for Station Enhancements at Kings Cross Mainline Railway Station.
- 1.2 This submission will take due cognisance to the needs of disabled persons as defined within the Disability Discrimination Act 1995; Chapter 50 and subsequently to the provisions set out within the Disability Discrimination Act 2005; Chapter 13. (Henceforth jointly referred to as the **DDA**).
- 1.3 Although reference to the full provisions of the DDA is made, particular reference is directed through considerations under the provisions set out under the DDA (1995; Chapter 50) as:
 - Part 1 (Disability)
 - Part 2 (Employment)
 - Part 3 (Discrimination in other areas) Goods, Facilities and Services.
 - Part 5 (Public Transport) Sections 46 & 47 Rail Vehicles

And under the DDA (2005; Chapter 13) as:

- Section 2 Discrimination by public authorities.
- Section 3 Duties of public authorities.
- Section 5 Transport Rail Vehicles; Application of section 19 to 21 of the 1995 Act to transport vehicles.
- Section 6 **Transport** Rail Vehicles; application of accessibility regulations.
- Section 13 Discrimination in relation to letting premises.
- Section 18 Meaning of "disability".
- 1.4 This submission will undertake assessment of accessibility requirements against compliance to the DDA and will consider design compliance to be met through existing accessibility management policies and design standards set out under Regulatory design standards under the provisions of the Railways Act 1996 to include reference to:
 - SRA Train Station Services for Disabled Passengers A Code of Practice (ISBN 0-10-545095-2).
 - Railway Safety Principles and Guidance Part 2- Section B -Guidance on Stations (ISBN No. 0 7176 0713 5).
 - Department for the Environment, Transport and Regions (1998) (DfT)
 Document Guidance on the use of tactile Paving Surfaces.
 - Approved Document Part M of the Building Regulations (2004 Edition).
 - BS 8300:2001 (Design of Buildings and their approaches to meet the needs of disabled people).
 - BS 5588: 1999 Part 8 (Code of practice for means of escape for disabled people).

2. INTRODUCTION

2.1 **Disability - Definition**

- 2.1.1 This submission will take consideration of two key elements of enhancements to accessibility within design in consideration of the requirements for access / egress by:
- Persons 'COVERED' under the provisions of the DDA (Those who 'ARE' classified as Disabled under provisions of the DDA).
- Persons 'NOT' Covered under the provisions of the DDA as under the categorisation of Mobility impaired. (Those who are 'NOT' classified as Disabled under the provision of the DDA).
- 2.1.2 In assisting clarity within the two categories (Disabled or Mobility Impaired) direct reference to the designation of Disability is given with direct reference to the DDA as follows:

Disability:

DISABILITY

Meaning of "disability" and

- 1. (1) Subject to the provisions of Schedule 1, a person has a disability for the purposes of this Act if he has a physical or mental impairment which has "disabled person". a substantial and long-term adverse effect on his ability to carry out normal day-to-day activities.
 - (2) In this Act "disabled person" means a person who has a disability.

Past disabilities.

- 2. (1) The provisions of this Part and Parts II and III apply in relation to a person who has had a disability as they apply in relation to a person who has that disability.
- (2) Those provisions are subject to the modifications made by Schedule 2.
- (3) Any regulations or order made under this Act may include provision with respect to persons who have had a disability.
- (4) In any proceedings under Part II or Part III of this Act, the question whether a person had a disability at a particular time ("the relevant time") shall be determined, for the purposes of this section, as if the provisions of, or made under, this Act in force when the act complained of was done had been in force at the relevant time.
- (5) The relevant time may be a time before the passing of this Act.

Guidance.

- 3. (1) The Secretary of State may issue guidance about the matters to be taken into account in determining-
- (a) whether an impairment has a substantial adverse effect on a person's ability to carry out normal day-to-day activities; or
- (b) whether such an impairment has a long-term effect.
- (2) The guidance may, among other things, give examples of-

- (a) effects which it would be reasonable, in relation to particular activities, to regard for purposes of this Act as substantial adverse effects;
- (b) effects which it would not be reasonable, in relation to particular activities, to regard for such purposes as substantial adverse effects;
- (c) substantial adverse effects which it would be reasonable to regard, for such purposes, as long-term;
- (d) substantial adverse effects which it would not be reasonable to regard, for such purposes, as long-term.
- (3) A tribunal or court determining, for any purpose of this Act, whether an impairment has a substantial and long-term adverse effect on a person's ability to carry out normal day-to-day activities, shall take into account any guidance which appears to it to be relevant.
- (4) In preparing a draft of any guidance, the Secretary of State shall consult such persons as he considers appropriate.
- (5) Where the Secretary of State proposes to issue any guidance, he shall publish a draft of it, consider any representations that are made to him about the draft and, if he thinks it appropriate, modify his proposals in the light of any of those representations.
- (6) If the Secretary of State decides to proceed with any proposed guidance, he shall lay a draft of it before each House of Parliament.
- (7) If, within the 40-day period, either House resolves not to approve the draft, the Secretary of State shall take no further steps in relation to the proposed guidance.
- (8) If no such resolution is made within the 40-day period, the Secretary of State shall issue the guidance in the form of his draft.
- (9) The guidance shall come into force on such date as the Secretary of State may appoint by order.
- (10) Subsection (7) does not prevent a new draft of the proposed guidance from being laid before Parliament.
- (11) The Secretary of State may-
- (a) from time to time revise the whole or part of any guidance and re-issue it;
- (b) by order revoke any guidance.
- (12) In this section-
- "40-day period", in relation to the draft of any proposed guidance, means-
- (a) if the draft is laid before one House on a day later than the day on which it is laid before the other House, the period of 40 days beginning with the later of the two days, and
- (b) in any other case, the period of 40 days beginning with the day on which the draft is laid before each House,

no account being taken of any period during which Parliament is dissolved or prorogued or during which both Houses are adjourned for more than 4 days;

and

"guidance" means guidance issued by the Secretary of State under this section and includes guidance which has been revised and re-issued.

- 2.1.3 The term Mobility impaired is not clearly given within the terms of the DDA as an associated condition, but is considered through this submission as a restriction to mobility that is not covered under the provisions of the DDA described above.
- 2.1.4 Through this submission it will be considered that access enhancements detailed will be provided for access to the higher standard of Disabled access as defined under the DDA. Facilities are proposed however for use by both the Disabled and Mobility impaired without discrimination to either party.
- 2.1.5 Where assistive access is required through the provisions of the DDA existing Railway Licence commitments established under Network Rails established Disabled Persons Protection Policy (DPPP) for Kings Cross Station.
- 2.1.6 This policy is established for all stations managed by Network Rail and additionally by operators of railway stations owned by Network Rail but franchised under lease to franchised train / station operators under Licence to operate train services within the United Kingdom.
- 2.1.7 This a live document considering changes in management and operational needs of customers accessing station facilities.
- 2.1.8 This policy provides for the provision of assistive access staffing assistance to customers under the provisions of the DDA where access may be required to train services and station facilities.

2.2 Consideration of Disability Discrimination Act (DDA) Issues

- 2.2.1 The intent of the Disability Discrimination Act is to offer disabled people an accessible environment, which does not discriminate against them because of their disability. The term "disability" should therefore be seen in the broadest of terms.
- 2.2.2 Consideration of the requirements of the DDA note that this is not a prescriptive design guide.
- 2.2.3 It may be worthy of note that the term 'DDA Design compliant' has intentionally not been used within descriptive text. This consideration is made in due accord to the ability for enhanced accessibility which may be provided through assistive access provision (eg. staffing assistance) without specific requirements for infrastructure change.
- 2.2.4 This submission will as such note the requirements under the DDA and compliance to Regulated Railway Station Design standards, with enforcement to design compliance being managed through Railway operating Licence under the provisions of the Railways Act 1996.
- 2.2.5 Standards of design compliance within the Regulated design framework are established through direct reference to Nationally approved design standards and will require formal dispensation from regulatory bodies to allow for variance from Regulated standards.

3. OVERVIEW OF THE SITE AND APPRAISAL

3.1 The Appraisal

- 3.1.1 This report is an evolving document, which is updated at regular intervals following discussions with appropriate parties and local authorities.
- 3.1.2 This appraisal is presented as a review of requirements and control management of facilities for Disabled and Mobility Impaired customers, employees and members of the public having access to Goods Facilities, Services and employment within the Kings Cross Station site.
- 3.1.3 This document makes direct reference to the differing requirements of the Disabled and Mobility Impaired within access design and will reflect on note specific compliance to the duty of design and management under the provisions of the Disability Discrimination Act(s) 1995 & 2005.
- 3.1.4 It is considered that through inclusive design the benefits of access and egress shall be shared by both sectors equally to allow, where possible, equal status to all station users requiring assistive access through the station confines.
- 3.1.5 Through the application of Regulated station design standards founded on the provisions of BS8300 and managed under Railway licence conditions, it will be shown that the minimum standards established for commercial design shall be met.
- 3.1.6 Where standards are unable to be met for any reason, this report identifies the requirement of formal written derogation from standards approved by Regulatory transport authorities.

3.2 The Site

- 3.2.1 King's Cross Station and the surrounding area considered of great strategic importance at National, Regional and Local levels. It will shortly form an International gateway to London through direct links with St Pancras International Station Linking International Rail routes from Europe via Channel Tunnel Rail links with those of a gateway to the City of London and routes to Scotland and the North-East of England. At a Regional level, King's Cross Station forms a key meeting point for local rail and primary road networks.
- 3.2.2 At a local level, Kings Cross station forms a primary interchange zone and forms the linking component between Euston Road and the proposed King's Cross Central development area to the North of the station.
- 3.2.3 The Station enhancements proposed under this and associated submissions on behalf of Network Rail are considered to influence, and be influenced by, adjacent development projects including St Pancras International and Mainline station services, LUL, King's Cross Central and Regent's Quarter.
- 3.2.4 Additional account is also taken of emerging proposals for Cross River Transit, the Euston Road Master plan and Thameslink Programme.

3.3 Extent of Development proposals:

3.3.1 The site extends from the tunnel portals to the north of the station as far as Euston Road to the South, and from York Way to the east to Pancras Road and the King's Cross Central development boulevard to the west.

3.3.2 The extent of the King's Cross Station Enhancement proposal, to which this document refers to, is outlined below.

3.4 The Proposal

3.4.1 The scheme proposes a New Western Concourse development composed of a series of inter-linked but individually identifiable zones.

3.5 Western Range

- 3.5.1 Refurbished and enhanced support accommodation is provided within the Grade 1 listed building, with key new circulation connections provided.
- 3.5.2 An additional passenger connection to platform 8 can be found to the North of the Western Range, next to the main station reception.
- 3.5.3 In the central section, the original ticket hall houses a new Travel Centre and lifts provide access to first floor passenger lounge.
- 3.5.6 At the South, the concourse connects through to the Main Shed.

3.6 Passenger Concourse

- 3.6.1 The new concourse area acts as an internal court between the Western range and new Western perimeter accommodation, this volumetric space provides passenger accumulation space focused around customer information boards in two areas to the North and South relating directly to the Western and main shed connections.
- 3.6.2 Ingress and egress to the concourse is adjacent to each of these from the Northern and Southern Squares respectively, and through the perimeter accommodation from the West.

3.7 Western Concourse Perimeter Accommodation

- 3.7.1 The Western concourse accommodation is defined as an independent island to the West of the passenger concourse itself.
- 3.7.2 The ground level consists of a new link to the London Underground Northern Ticket Hall and retail space whilst maintaining clear routes through to the perimeter arcade and station forecourt.
- 3.7.3 On the mezzanine level, additional retail/catering units and related seating areas overlook the space below.
- 3.7.4 A link bridge to the North of the mezzanine connects to the Western Range and onto a new platform over bridge in the main train shed, providing direct access from accommodation at first floor in the concourse and Western range, directly down to the mainline platforms.

3.8 Pedestrian Arcade

3.8.1 A pedestrian arcade is located between the columns supporting the roof structure and the outer facade.

3.8.2 This creates a perimeter zone between the passenger concourse and station forecourt as well as providing a sheltered passageway north South around the site.

3.9 Station Forecourt

- 3.9.1 To the west, this is an external space facilitating circulation North-South around the concourse and the Great Northern Hotel, and East-West between the concourse and vehicle set-down and pick-up areas.
- 3.9.2 Accommodation is visible within the internal pedestrian arcade, and a protected environment is created by the extended eaves edge to the concourse roof, combined with localised canopies defining the vehicular drop-off and pick-up zones.
- 3.9.3 To the South, a major new public square is created on the footprint of the demolished Southern concourse, creating a fitting urban context for the representation of these two outstanding rail terminus buildings.
- 3.9.4 The newly revealed Southern facade of King's Cross will be refurbished and relit, and a new canopy will provide protection to passengers entering the Southern square from arrivals in the main shed.

3.10 The Great Northern Hotel

- 3.10.1 To create a more generous pedestrian environment between the Southern square and the Northern square, London & Continental Stations & Property (LCS&P) have proposed that the ground floor of the hotel is remodelled to create a pedestrian arcade along its Eastern perimeter.
- 3.10.2 Door and window openings are proposed to be remodelled at ground level to facilitate pedestrian movement into and out of the concourse from the Hotel.

4. MEANS OF ACCESS AND EGRESS

4.1 Public Realm Access

- 4.1.1 Pedestrian analysis suggests that walking routes to the station are diverse there are strong flows from Pentonville Road and King's Cross road to the East, direct North-South movements across (and under) Euston Road, and from the East on the corner of Pancras Road.
- 4.1.2 The new development lands to the North will also generate significant pedestrian movements into and around the concourse in the order of 7,000 people per hour in the peak periods will move through or around the concourse edge.
- 4.1.3 Although there are considered to be slight level changes in and around the existing site, the high volumes of pedestrian traffic involved have considered accessibility requirements to require redressing of accessibility routes meant that the treatment of the approaches, and associated landscape design be an integral part of the project from the outset.
- 4.1.4 Access routes provided within this scheme have considered with provisions of free accessibility to all as a prime consideration to both the needs of the individual and to the needs of free customer accessibility and circulation without the need of auxiliary aids such as lift access to lower levels within the development.

- 4.1.5 Where stairs and ramps have been considered as the only viable solution to access these have been strategically located and will be carefully detailed with quality materials and finishes to comply with regulations and standards.
- 4.1.6 All Public areas will be slip resistant and be fully accessible for wheelchair use. The Public realm is designed to enable all year event usage. All events will be designed to relevant accessibility design standards.
- 4.1.7. A ramped accessibility route is proposed within this submission to enable access between York Way to the East of the Southern Square.
- 4.1.8 The ramp will be fully accessible for wheelchair usage. The ramp will be designed to relevant Regulated design standards as identified above.
- 4.1.9 Where detailed standards of configuration, or design, cannot be met for reason (special or other) a formal request for dispensation shall be sought from Regulated Design Standards through Regulatory Bodies in confirmation of acceptance of design and derogation from relevant design standards.

4.2 Bus and Taxi Connections

- 4.2.1 Passengers arriving or departing by bus will benefit from the provision of bus stands on the Euston Road and Pancras Way. Some services will also stop on York Way to the East of the Station.
- 4.2.2 Those travelling by taxi or car will arrive and depart from the western side of the new concourse, via new drop off and pick up facilities located on Pancras Road. Located adjacent to the entrances these drop off and pick up facilities allow step free access to the interior of the Concourse.
- 4.2.3 A total of three disabled parking bays are currently proposed within the taxi drop off area.

4.3 Building Entrance

- 4.3.1 The Western Concourse is approached and accessed from the Southern Square on Euston Road, from St Pancras Station to the West and from the Northern Square to the Northwest.
- 4.3.2 All of the above approaches will be provided with level or ramped (step free) access to the centre of the main passenger concourse, from where the main line, suburban line and underground stations may all be accessed.

5. INTERNAL ACCESS

5.1 Concourse Area

- 5.1.1 The predominant flow of passengers into and out of the station in the order of 60% is from the London Underground.
- 5.1.2 These passengers will arrive at, and depart from, the station through a large bank of escalators to the Western edge of the new concourse, from a stair immediately to the South of the Western range, or from a single escalator located in front of the suburban train shed.
- 5.1.3 Two disability compliant customer lifts are provided next to the South East stair and next adjacent to the Western bank of escalators.

- 5.1.4 It is also anticipated that a significant number of passengers will exit the station through the southern façade and make their way by foot to the Underground entrance adjacent to Euston Road.
- 5.1.5 All accessible to staff within the station (transport and / or retail) will be made accessible to disabled access under the provisions of part 2 (Employment) of the DDA.

5.2 Mezzanine and First Floor Areas

- 5.2.1 Two disabled compliant customer lifts are to be provided public access from ground floor of the Concourse to Mezzanine level.
- 5.2.2 The first of these lifts is proposed to the West and provides direct access between the LUL Northern Ticket Hall, the new Western Concourse and the Mezzanine while the second is proposed to the Southern end of the perimeter accommodation, close to the main entrance from the Southern Square.
- 5.2.3 All staff areas of the Mezzanine will be made fully accessible for access under part 2 (Employment) of the DDA.

5.3 Western Range

- 5.3.1 Public access to first floor areas of the Western Range is either via a footbridge from the mezzanine, or two disabled compliant lifts located in the Old Booking Hall.
- 5.3.2 All staff areas of the Western Range are fully accessible via a series of disabled compliant lifts serving the various levels of the building.
- 5.3.3 The basement of the Western Range houses the On Board Servicing (OBS) accommodation, with goods lifts providing access from platform to sub basement level for the transportation of food services between food preparation areas and platform and train services.
- 5.3.4 Where reasonable under the provisions set out under part 2 (employment) of the DDA this lift access shall be accommodate the needs of access to disabled employment within the OBS area.
- 5.3.5 Deliveries are made to the Shared Service Yard at sub basement level and goods lifts connect to basement level.
- 5.3.6 All staff areas of the basement and sub basement will be made fully accessible, where reasonable, under provisions of part 2 (Employment) of the DDA, to disabled members of staff employed within these areas.

5.4 Platforms

- 5.4.1 Increased (unassisted) access to trains from platform level will 'Not' be provided under this submission under Part 5 (Public Transport) Sections 46 & 47 of the DDA.
- 5.4.2 Assistance for all customer access / egress to trains will be maintained and enhanced where appropriate through demand or infrastructure restrictions through the provision of the Network Rail DPPP for Kings Cross Station. This through staff assistance to customers wishing to gain access / alight from passenger trains.

- 5.4.3 Access to surface level trains from the new concourse is proposed under a three phase management procedure:
- a) The majority of passengers using train services in the main train shed will move from the new concourse at its southernmost end, through the Western range and onto platforms from the South.
- b) Passengers using trains in the existing suburban train shed will move directly from the concourse onto the platforms to the North. There is also provision for a platform over-bridge that allows passengers using catering facilities and customer lounges in the Western Concourse and Western Range to move at first floor level directly onto the main train shed platforms.
- c) Access from the ground floor of the main Concourse area to both the Mainline and Suburban platforms is proposed to be step free through inclusion of ramped access routes where required and to be made fully accessible to both under the DDA and to those customers and members of the public suffering mobility impairment.
- d) From first floor level a passenger footbridge links the mezzanine area to the Western Range and connects with the Platform Over Bridge to provide access through into the Main Train Shed.
- e) Access from this location will be provided through the installation of 5No. Disability compliant customer lifts, providing direct access down to each of the 8 mainline platforms.

5.5 WC Facilities

- 5.5.1 Sufficient provision for disabled WC's and easy access to them is given in all public and private areas of the Enhancement proposal.
- 5.5.2 To overcome the horizontal level differences within the Western Range new WC cores are provided at each level within the Southern Wing, the Northern Wing, the Link Building, the Northern Building and the North West Building.
- 5.5.3 All WC facilities provided for disabled access will be considered for the additional beneficial use by MIP customers through design, and where necessary, access provision provided under Network Rails Station DPPP.

6. HORIZONTAL ACCESS

The buildings have been designed to and generally exceed the recommendations set out within relevant Regulated design standards.

Where detailed standards of configuration, or design, cannot be met for reasons of limitation of circulation space (or other) a formal request for dispensation shall be sought from Regulated Design Standards through Regulatory Bodies in confirmation of acceptance of design and derogation from relevant design standards.

6.1 Internal Lobbies

All internal lobbies shall comply with design criteria set out under Regulated Guidance and where found to be non-compliant to Regulated standards shall request formal dispensation from design criteria.

7. VERTICAL ACCESS

The concourse has been designed to, and generally exceeds, the recommendations set out in BS8300 for vertical access. This is in line with recommendations set out within Regulated Station Design criteria.

Principal access to the upper floor is by means of escalators to the North and South of the mezzanine level while 2No Disabled passenger lifts, located next to the Western bank of escalators and to the south, easily visible from the concourse area.

These centrally provide access from ground floor to both mezzanine and LUL level. Public access to the first floor level of the Western Range is either by the 2No Disabled passenger lifts located in the Old Booking Hall.

All staff areas of the Western Range are fully accessible via a series of lifts serving the various levels of the building.

7.1 Passenger Lifts

The disabled passenger lifts are the principal means of access and egress for both disabled and mobility-impaired persons to all levels of the building.

All disabled passenger lifts shall comply with are designed to comply with the requirements of En 81-1&2, Approved Document Part M and BS8300, including anti-reflective finishes, colour contrasting fitments, tactile guidance, controlled lighting levels and audible announcements.

8. MEANS OF ESCAPE

It is proposed that the Fire fighting lifts within each core should be utilised for disabled egress only in the case of an emergency situation.

An additional disabled refuge with a two-way communication point will be provided within each core area.

The use of this refuge will be controlled under fire or incident controlled evacuation of the station under provision of trained staff. Management of evacuation of both disabled and mobility impaired customers will be directed through planned procedures set out within Network Rails DPPP and fire evacuation plans for Kings Cross Station.

Access to and from the Fire Fighting Lifts by custom

Customer access to the Fire Fighting lifts will be through level access routes within floor / access route design.

9. GENERAL CONSIDERATIONS

- All Lighting within the building will be designed to CIBSE-Code for internal lighting and CIBSE-LG6-Outdoor Environment.
- Passenger lifts within the building will be designed to BS EN 81-1&2.
- Other than illuminated Exit signs, no visual alarm system will be present within the building. This will require the evacuation strategy to take this into account.

- Fire Fighting lifts within the building will be designed to BS EN 81-1&2 and BS5588 Part 5. It is proposed that the Fire fighting lifts should be utilised for disabled egress only in the case of an emergency situation.
- Fluorescent lighting will be kept to a minimum where possible.

10. CONCLUSION

The new Western Concourse has been designed with Disabled, Mobility Impaired customer and pedestrian access as a prime consideration within design.

Within these provisions step free access is made to all levels, interchange travel distances are minimised and good-sized customer information systems are well positioned.

The layout provides user friendly and convenient access to all areas and responds to all constraints of this particular site. All relevant requirements have been met and generally exceeded.

The future review of tenancy fit-out for both commercial and retail use will require that an in-depth assessment of tenants proposals are given through Landlord approvals by Network Rail.

Particular reference will be made to the provision of design to Part 2 (Employment) and Part 3 (Service Provision) of the DDA.

Network Rail will maintain the right to refuse consent to tenants fit-out design proposals in line with Part 7; 57 of the DDA (Aiding unlawful acts).

- Ends -