

## 156 West End Lane

15.12.2016

### Accessibility Statement (revised)

#### Proposed Changes to Resubmitted Scheme August 2016

Following a series of meetings and discussions with council officers, a number of further amendments are proposed.

Principally to the West Building, the changes will involve amending the majority of the flats and therefore we will be reviewing the layouts of all units including the wheelchair units. These will be submitted as part of further revisions to the scheme.

The further changes to the proposals comprise:

- A total of 164 units
- A revised mix including an increase in affordable rented family units and a reduction in the number of 2 bedroom shared ownership units replacing these with more 1 bedroom units
- 18 wheelchair (M4 (3) type) units,
- 3 private sale M4 (3) adaptable units ( as requested by officers)
- 13 Affordable rented M4 (3) fully adapted units
- 1 Shared ownership M4 (3) adaptable units

As noted above, these changes to the quantity and mix of tenure of the proposed wheelchair housing. As a consequence, the amended scheme includes 146 units (89%) designed to M4(2) standards, and a total of 18 units (11%) are categorised as wheelchair units designed to M4(3) standards.

The fully adapted wheelchair units are retained within the Affordable Rented tenure (with an increase to 14 units) and three adaptable units are now private sale units as requested by officers, with one unit being a shared ownership unit in the eastern building.

#### **A: Inclusive design**

The scheme has been designed to meet all relevant inclusive design requirements in relation to current accessibility requirements as set out in the building regulations AD Part M and Lifetime Homes.

#### **1. Unit design**

Following the changes introduced by the Government to simplify and consolidate standards into a national framework centred on Building Regulations, “old” separate standards have been incorporated into new consolidated standards.

This results in, effectively, three tiers (categories) of accessible housing based on the “old” standards in the Building Regulations part M4:

- Category 1 (the baseline regulation, and not relevant to this scheme);
- Category 2 (most comparable to the “old” Lifetime Homes); and
- Category 3 (wheelchair standards for adaptable and fully adapted housing).

The Design & Access Statement Addendum (July 2016) confirms that all residential units are designed to meet current Part M4 (2) and M4 (3) standards.

Part M4 requires 10% of units to be designed to Part M4(3) standards and the remaining units to be designed to Part M4(2) standards.

In accordance with those requirements, 18 units of the 164 total (11%) are categorised as wheelchair units, designed to M4(3) standards. A total of 146 units (89%) are designed to M4(2) standards.

Of these 18 units, 78% (14 units) are fully adapted. All are proposed to be within the Affordable Rented tenure, and therefore subject to Council nomination in relation to future tenants. The remaining four adaptable units (22%), are a mix of Shared Ownership and Private Sale units. This arrangement reflected a position agreed with council officers during post-submission discussions. A summary of the Part M4(3) wheelchair units is set out below. Detailed layouts are provided as part of the Design & Access Statement Addendum Appendix 3.

**Wheel chair units (M43) unit types – Refer to Design & Access Addendum Appendix 3 for Flat layouts**

Floor / Building	Unit Number / tenure	Size	Type (refer to Appendix 3)	Optional building Regulation Standard
1 <sup>st</sup> floor / West	W1.01 Affordable Rent	1b2p	AB	M4(3) Fully adapted
2 <sup>ND</sup> floor / West	W2.04 Affordable Rent	3B4P	AF	M4(3) Fully adapted
2 <sup>ND</sup> floor / West	W2.05 Affordable Rent	2b4p	AD	M4(3) Fully adapted
2 <sup>ND</sup> floor / West	W2.06 Affordable Rent	1b2p	AB	M4(3) Fully adapted
2 <sup>ND</sup> floor / West	W2.16 Affordable Rent	1b2p	AJ	M4(3) Fully adapted
3 <sup>RD</sup> floor / West	W3.04 Affordable Rent	3B4P	AF	M4(3) Fully adapted
3 <sup>RD</sup> floor / West	W3.05 Affordable Rent	2b4p	AD	M4(3) Fully adapted
3 <sup>RD</sup> floor / West	W3.06 Affordable Rent	1b2p	AB	M4(3) Fully adapted
3 <sup>RD</sup> floor / West	W3.16 Affordable Rent	1b2p	AJ	M4(3) Fully adapted
4 <sup>TH</sup> floor / West	W4.04 Affordable Rent	3B4P	AF	M4(3) Fully adapted
4 <sup>TH</sup> floor / West	W4.05 Affordable Rent	2b4p	AD	M4(3) Fully adapted
4 <sup>TH</sup> floor / West	W4.06 Affordable Rent	1b2p	AB	M4(3) Fully adapted
4 <sup>TH</sup> floor / West	W3.16 Affordable Rent	1b2p	AJ	M4(3) Fully adapted
5 <sup>TH</sup> floor / West	W5.05 Affordable Rent	2b3p	AD2	M4(3) Fully adapted
LG floor / East	E1.03 Shared Ownership	1b2p	SC	M4(3) Adaptable
LG floor / East	E1.04 Private Sale	1b2p	PE	M4(3) Adaptable
LG floor / East	E1.08 Private Sale	1b2p	PA	M4(3) Adaptable
LG floor / East	E1.09 Private Sale	1b2p	PA	M4(3) Adaptable

## 2. Detailed unit design

All wheelchair units are designed to be capable of being easily adapted (without the need to move structural walls, stacks or concealed drainage). The details of locations for “soft walls” will be developed at a later stage in detailed design development, as typically occurs.

To clarify and confirm details of spatial design requirements, annotated plans are included within appendix 3 of the DAS Addendum for all wheelchair units showing compliance in this regard with M4(3). It is acknowledged that this was not previously specifically annotated on the drawings. In summary the following clarifications are confirmed in relation the revised proposals:

- All wheelchair units incorporate sufficient space for wheelchairs in addition to general storage.
- All wheelchair units incorporate 1500mm clear access zone in front of and between all kitchen units and appliances.
- Every door has a 300mm nib on the leading edge. Detailed plans for non wheelchair units have not yet been produced, however they will comply with M4(2) requirement.
- All balconies and terraces are to have level access in compliance with M4(2) and M4(3).
- All units include the provision for a potential level access shower. Level access showers will be provided where necessary and are possible in all other cases.
- All Lower Ground floor units have level access from the communal courtyard. Stepped access is provided at one entrance due to changes in the site’s gradient (the whole site is at a gradient west/east as is Potteries Path). A plan/section of the Lower Ground floor flats is has been issued to officers for clarification.
- A platform lift is included to the first floor podium to provide fully accessible circulation to the disabled parking bays and refuse store located at Ground Floor level of the west building, with travel under cover from Cores 1 and 2 across the podium deck. The podium lift is provided in addition to the four lifts within Core 1 and Core 2. There will also be a 24 concierge presence on site.

## 3. Landscaping

Within the landscaped area seating has back supports and arm rests, so that it can be used easily by disabled people. Bespoke benches have also been illustrated as having backs in the Landscape Design & Access Statement.

Play areas will be inclusive as per London Plan Policy 3.6 and the SPG Play and Informal Recreation.

### **B: Shared pedestrian/cycleways**

The proposal results in the significant enhancement of Potteries Path. The Path, which is already used by both pedestrians and cyclists but is unwelcoming and dangerous, will allow both pedestrians and cyclists to use the route – and the new amenity areas created within the scheme – in a safe and controlled manner. New and enhanced landscaping and design have been used to provide a legible and improved link from West End Lane to Crown Close.

As set out in the Landscape Design and Access Statement, the proposals allow for the significant enhanced of Potteries Path including revised gradients to the path to allow for enhanced accessibility. The path provides a continuous 3m wide shared path for cyclists and pedestrians. The inside wall of Potteries Path – a high, unrelenting protective wall to the builders’ yard - has been removed and replaced with front gardens. Garden beds will provide a vegetative edge to the path and defensible planting to the private terraces.

The path has also been enhanced by providing a more consistent slope than currently exists, with maximum grades of 1:21 and landings every 500mm. Hazard corduroys have been incorporated either side of building entrances.

## APPENDIX : Additional Notes

### Camden Council : CPG2 Housing (revised May 2016)

This states:

All residential development should meet the 16 criteria that form the Lifetime Homes standards

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CGP2 supplements Camden Development Policies policy DP6 – Lifetime homes & wheelchair housing, as well as DP29 – Improving Access and Camden Core Strategy policy CS6 - Providing quality homes and Camden Core Strategy policy CS6 - Providing quality homes.

Policy DP6 states all new residential development will be expected to meet Lifetime Homes and Wheelchair housing design standards.

WHEELCHAIR HOUSING A minimum of 10% of new housing should either meet wheelchair housing standards, or be easily adapted to meet them. ‘Camden Wheelchair Housing Design Brief 2010’.

New homes that are capable of being easily adaptable should incorporate the key space criteria set out in the Habinteg Wheelchair Housing Design Guide and ensure that any fittings and fixtures required at a later date can be easily provided without enlarging or structurally altering the home.

For affordable housing: The 10% wheelchair requirement should be designed, built and fitted out to meet Wheelchair Housing standards in full. These affordable homes should comply with the Camden Wheelchair Housing Design Brief 2010 produced by the Council.

### GLA Housing SPG

**Standard 11** 90 per cent of new build housing should meet Building Regulation requirement M4(2) ‘accessible and adaptable dwellings’ with the remaining 10 per cent meeting Building Regulation requirement M4(3) ‘wheelchair user dwellings’.

Detailed guidance on how to meet these requirements is set out in Approved Document Part M131 and is not repeated in this SPG.

Analysis of the viability and affordability impacts of M4(2) may require ‘bespoke’ assessments of site-specific circumstances. Where necessary, for developments of four stories or less, the requirements of Policy 3.8Bc should be applied flexibly to ensure that residential or mixed use development is deliverable.

This may bear particularly on the following types of schemes;

- Flats above shops or garages, stacked maisonettes and low rise blocks of flats where the potential for deck access to lifts is restricted;

2.3.11 If proposals do not include step free access they should clearly demonstrate that achieving step free access would make the development unviable or would mean that service charges are not affordable for the intended residents. If the L PA accepts this then the base Building Regulation M4(1) could be applied.

2.3.12 It should also be noted that the Planning Practice Guidance<sup>133</sup> is clear that M4(3) wheelchair user dwellings can be applied to all tenures. However, M4(3) is divided into two categories; ‘wheelchair accessible’ (a home readily useable by a wheelchair user at the point of completion) and ‘wheelchair adaptable’ (a home that can be easily adapted to meet the needs of a household including wheelchair users). The Planning Practice Guidance<sup>134</sup> states that Local Plan policies for **wheelchair accessible homes** should only be applied to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling

(generally this will be social and affordable rented units). This means that market units can only be required to meet the standards for **wheelchair adaptable homes**.

### **Building Regulations**

#### **Approved Document M – Dwellings**

Requirement M4 'Sanitary conveniences in dwellings' is split into:

- M4(1) Category 1: Visitable dwellings
- M4(2) Category 2: Accessible and adaptable dwellings
- M4(3) Category 3: Wheelchair user dwellings.

Dwellings must meet the requirements of M4(1) unless a condition is imposed to meet the requirements of M4(2) or M4(3).

Regulation M4(1) is mandatory for all new dwellings unless one of the optional requirements M4(2) or M4(3) applies. As required by GLA and Camden 90% of flats are designed to meet M4(2) requirements, and 10% M4(3).

The allocation of proposed wheelchair units were discussed with the housing team at Camden and as per their request, all wheelchair units are affordable, with the majority affordable rented.

We confirm that all units have been designed to meet AD M M4 (2) with 10% designed to M4 (3) for fully adapted and adaptable dwellings.

#### **GENERAL NOTES:**

Comparison with 'old' standards and LTH:

##### **Category 2 M4(2) 'accessible and adaptable dwellings'**

Broadly equivalent to the LTH Standard, however:

- step-free access required to dwelling;
- no requirement for a through-floor-lift, hoist, temporary bed space at entrance level or turning circles in living or dining spaces;
- stair width minimum 850mm;
- modified wc approach zone;

##### **Category 3 M4(3) 'wheelchair user dwellings'.**

Provides a distinction between wheelchair adaptable dwellings (those which are constructed with the potential to be adapted for occupation by a wheelchair user) and wheelchair accessible dwellings (those which are constructed for immediate occupation by a wheelchair user).

- Minimum hall or landing width 1050mm;
- Minimum door width 850mm, irrespective of the direction of entry;
- Minimum areas of general built-in storage to be provided based on number of bedrooms;
- Minimum combined floor areas for living/dining/ kitchen space;
- Minimum length of kitchen worktop;
  - Different clear approach zones around items of sanitaryware specified for wheelchair adaptable/ wheelchair accessible dwellings and situations