

# Supplemental Access and Design Statement

For submission to: The Access and Service Development Officer  
Building Control Section  
London Borough of Camden  
5 Pancras Square  
London  
N1C 4AG

In support of Application: Amendments to Application P17-082-RP-068

Applicant: Anglo American and De Beers

## Proposal:

Extensions and refurbishment of the existing part seven, part five storey (plus basement) building including erection of a single storey roof extension to Saffron Hill block, part two-storey and part five-storey extensions within central courtyard, part removal of the existing façade and part replacement with new glazed, metal and stonework façade. Access alterations including redesign of existing pedestrian entrance and relocation of vehicular entrance on Charterhouse Street. Remodelling and replacement of existing plant and equipment. Provision of cycle parking spaces, and associated landscaping works.

Location: 17 Charterhouse Street, London, EC1N 6RA

Prepared by: Ian Watkins BSc, MSc, LLB, NRAC (No 072)

Date: 27th June 2018

## Contents

<b>1</b>	<b>PURPOSE OF ACCESS STATEMENT .....</b>	<b>3</b>
<b>2</b>	<b>CONTEXT.....</b>	<b>3</b>
<b>3</b>	<b>ACCESS STATEMENT .....</b>	<b>3</b>
<b>3.1</b>	<b>Anglo American and De Beers- Access Policy .....</b>	<b>3</b>
<b>3.2</b>	<b>Development Specific Access Considerations .....</b>	<b>4</b>
3.2.1	General .....	4
3.2.2	Use of the Building/Equality Act (2010) considerations .....	4
3.2.3	Security of the building and entrances .....	4
3.2.3	Modified Proposal for Charterhouse House Street Entrance .....	5
<b>4</b>	<b>SUMMARY .....</b>	<b>7</b>

# **1 Purpose of Access Statement**

This access statement is provided to assist the Access and Service Development Officer, London Borough of Camden, in considering a revised proposal for accessible pedestrian access into the building at the main Charterhouse Street entrance.

The proposal made in this document considers both the need for accessibility, while taking into consideration the unusual security aspects of this property that have an impact on the practical design of the entrance.

The scheme proposed at planning was a double 'Clam Door' arrangement with side doors at the main entrance.

The revised proposal is for a revolving door with an adjacent sliding door at the main entrance.

The Statement has been made by Ian Watkins who is an Auditor Member of the National Register of Access Consultants (No: 72).

## **2 Context**

Anglo American and De Beers have vacated 17 Charterhouse Street and are now extending and transforming the buildings to meet the future needs and aspirations of the group.

The main entrance at 17 Charterhouse Street was originally designed to support the building's high-level security needs, and the requirements for discretion at the time. Consequently, the entrance was unsuitable for current access needs and did not imbue the impression of a welcoming and open modern organisation the Anglo American and De Beers wish to portray.

Anglo American and De Beers wish to create a welcoming and sustainable global headquarters for the group within the heart of the renowned jewellery quarter.

## **3 Access Statement**

### **3.1 Anglo American and De Beers- Access Policy**

Anglo American and De Beers recognise the need to fully meet their duties under the Equality Act (2010) in terms of providing an accessible environment that does not discriminate against disabled people, and to provide an inclusive environment in accordance with Approved Document Part M (ADM) and the recommendations given in BS8300.

To this end, Anglo American and De Beers have been proactive in ensuring that the property previously occupied had been audited for accessibility. The Access Audit of

20 Carlton House Terrace (the company's current headquarters) was undertaken on 17<sup>th</sup> February 2017.

Anglo American and De Beers recognise the importance of London Plan Policy 7.2 and the desire to achieve the highest standards of accessible and inclusive design, in all new developments in London.

When considering this project, the Group have aimed to remove all areas and circulation hindrances throughout the building and provide a fully accessible working environment for all employees and visitors as stated in the Access and Design Statement that accompanied the initial planning applications.

## **3.2 Development Specific Access Considerations**

### **3.2.1 General**

The methodology to be applied by MDM with regards to access requirements is the application of:

The Building Regulations, Part M 2004

Equality Act (2010)

BS9999 (2008)

BS8300 (2009)

Accessible London: Achieving an inclusive environment

### **3.2.2 Use of the Building/Equality Act (2010) considerations**

The property will be used as private offices, with invited access only to those not employed by the group of companies. The relevance of this is that there will be no service provision from the property. The duties placed on 'Service Providers' under the Equality Act (2010), where disability is the protected characteristic, require an anticipatory approach to accessibility. The duties placed on employers require a reactionary approach. Although the anticipatory approach to accessibility is not strictly required, Anglo American and DeBeers desire to achieve an inclusive environment, regardless of Equality Act duties.

### **3.2.3 Security of the building and entrances**

Very high value rough and polished diamond stocks and numerous items of jewellery (totalling more than \$120m) will be present in the building and therefore the issues surrounding security for this property become more significant than for most buildings that provide a workplace.

Of high concern is the avoidance of unauthorised group entry into the building. This is not only to prevent theft of the high value items, but also to maintain the safety of building occupants who may be at risk if there is unauthorised access.

There is a second line of defence within the reception area that consists of a shutter that can drop down and be deployed in an emergency, and speed gates to regulate access beyond the reception desk, however, the key concerns regarding security and the design of the entrance are as follows:

- Any entrance design must allow strict access control so that only permitted employees and visitors can access the entrance
- The design of the entrance must limit the ability of people to gain unauthorised entry by ‘tail gating’ legitimate personnel
- The design of the entrance must be such that it is not susceptible to the opportunity to jam it open for a sufficient period to allow ingress of a group of unauthorised people
- The design of the entrance must be such that a fast ‘lock down’ of the entrance can be achieved in the event of an unauthorised attempt at entry.
- The design of the entrance must still allow high pedestrian usage and be accessible.

Advice has been taken from PC Jim Cope, Design Out Crime Officer of the Metropolitan Police.

The relevant advice regarding the door arrangement for the main entrance is as follows:

*“Currently the main entrance doors are shown as being Two (2) automatic ‘Clam’ style type sliding doors. These work on the principle that as the first door opens the second door will also open in a short space of time to allow entry into the building. In theory the first door should be closed as the second opens to prevent loss of heat and prevent inclement weather from entering the building. Unfortunately, if used on a high pedestrian usage building the doors are found to be continually open and any security they may have is lost.*

*Therefore, as a security feature to any building I would not recommend the above style doors as the best way to control access and movement into the building. Due to the proposed use of the 17 Charterhouse Street security is a major issue and this has been addressed with other parts of the building. From analysing the plans the main entrance/reception is currently the weakest part of the building and will need to be addressed. I would recommend the fitting of an LPS 1175 Issue SR2 (as minimum security rated product) revolving door and if another access is required complying with DDA then these should also be rated to LPS 1175 Issue SR2. Obviously these are not security tested to a vehicle attack but can easily be ‘locked down’ from the reception desk and prevent any other unauthorised access”.*

(Please see the complete correspondence regarding this matter attached.)

### **3.2.3 Modified Proposal for Charterhouse House Street Entrance**

It is accepted that Clam doors will provide an accessible entrance that provides equity of access to all users, but unfortunately the arrangement will not meet the level of security required for the unusual use of this building. The expected footfall at the

entrance may mean that both inner and outer doors are open at the same time for prolonged periods. Tail gating can be easily employed by unauthorised persons. The door can be easily physically jammed open to allow unauthorised group access and prevent fast lock down.

The revised proposal for the Charterhouse entrance is shown in the submitted drawings. The revised scheme incorporates a revolving door with an adjacent sliding door.

- It will be operated by an automatic hands-free proximity sensor carried by any authorised persons such that the sliding door entrance will only be available to those authorised personnel (and authorised visitors by request) to whom the revolving door would be inaccessible
- It will meet the provisions of 2.21 of Part M of the Building Regulations for an accessible door to accompany a revolving door
- The main entrance will also be supplemented with a door entry system that will be accessible to all, including deaf and hard of hearing people and people who cannot speak, so that any person requiring assistance to enter the building may request it.

It is appreciated that revolving doors on their own are not considered as an accessible solution in Part M of the Building Regulations and BS8300 unless the doors are accompanied by an accessible entrance. Door types that are not preferred (such as revolving doors) can be combined with preferred types providing use of the preferred type does not disadvantage the user (e.g. by requiring a lengthy detour). In this case, the preferred type of door is adjacent to the revolving door.

The revised proposal will allow for security of the building (and safety of occupants) to be maximised whilst still providing a fully accessible entrance.

The modified proposal:

- facilitates access control so that all authorised persons can conveniently gain entry through an appropriate door without the need for assistance
- significantly reduces the risk of any unauthorised access by ‘tail gating’ due to the design of the revolving doors, and the secure default state of the adjacent sliding door
- Reduces the opportunity for an unauthorised person to jam open the door to allow unauthorised group access
- Can be locked down swiftly with the press of a button if required by security.

The modified proposal:

- provides a secure accessible entrance for all employees and visitors
- facilitates high pedestrian usage without compromising security meets the requirements of Part M of the Building Regulations
- meets the recommended code of practice provided in BS8300
- meets the London Plan Policy 7.2 by supporting the principals of inclusive design which seek to ensure that developments:

- 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

## **4 Summary**

The Access Officer is asked to consider the arguments put forward in this Supplemental Access Statement.

Specifically, these are:

- That the main entrance solution on Charterhouse Street must be accessible to all authorised persons.
- The unusual and specific security requirements relating to the contents and use of this building preclude the use of 'Clam doors' as, although this indeed may be the most desirable arrangement in terms of equity of access for all authorised persons, it does not address the unusual security requirements
- The revised proposal addresses the balance appropriately by providing an entrance that meets the design requirements of Part M, the recommendations of BS8300 and supports the London Plan Policy 7.2 regarding inclusive Access, while also providing a secure entrance that can be easily locked down, prevent unauthorised access, and therefore maximise security and safety of occupants.

A request is made to the Access Officer to recommend approval for the revised proposal.

Attachment- Security Advice from the Metropolitan Police



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Continous Policing Improvement  
Command (CPIC)

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Dear Paul,

The following recommendations are as a result of the meeting with yourself and other relevant partners who are involved in the development of 17 Charterhouse Street, EC1 which was held on the 14<sup>th</sup> March 2018.

As discussed the major concern surrounding the design of the building is the main entrance doors that are situated on Charterhouse Street and which are opposite Shoe Lane. It is strongly felt that this area is vulnerable, as Shoe Lane provides ample space for a vehicle to achieve a maximum speed to ram the main entrance doors and force entry. This type of attack would be difficult during the day due to the large amount of traffic coming from Holborn Circus to Farringdon Street but would not be impossible if a look out was used covering the blind junction. It would more than likely occur at night when the building is not in use and vehicle activity is reduced.

The only way to prevent this type of attack on the building would be the placement of HVM (Hostile Vehicle Mitigation) bollards between the kerbing and building line. As I explained during the meeting this is something I cannot myself recommend so have requested advice from the local CTSA (Counter Terrorism Security Advisor).

Currently the main entrance doors are shown as being Two (2) automatic ‘Clam’ style type sliding doors. These work on the principle that as the first door opens the second door will also open in a short space of time to allow entry into the building. In theory



the first door should be closed as the second opens to prevent loss of heat and prevent inclement weather from entering the building. Unfortunately, if used on a high pedestrian usage building the doors are found to be continually open and any security they may have is lost.

Therefore, as a security feature to any building I would not recommend the above style doors as the best way to control access and movement into the building. Due to the proposed use of the 17 Charterhouse Street security is a major issue and this has been addressed with other parts of the building. From analysing the plans the main entrance/reception is currently the weakest part of the building and will need to be addressed. I would recommend the fitting of an LPS 1175 Issue SR2 (as minimum security rated product) revolving door and if another access is required complying with DDA then these should also be rated to LPS 1175 Issue SR2. Obviously these are not security tested to a vehicle attack but can easily be 'locked down' from the reception desk and prevent any other unauthorised access.

If you require any further help or advice then I will be more than happy to assist.

Yours sincerely,

Jim Cope