

**ST CRISPIN'S CLOSE, LONDON**  
**Access Statement**  
**Application 2019/1858/P**

**Summary**

Following the consultation process for the above application, comments have been received from the Access and Inclusion Officer seeking confirmation of the following, with reference to London Plan Policy 7.2, and the Camden Access Policy:

- There is no 300mm nib on the pull side of the gate so it will not be suitable for wheelchair users.
- There are no details on the opening latch and whether it will be suitable for those with manual dexterity difficulties.
- There is a key pad, is this accessible to those with visual impairments?
- Is the key pad at an accessible height and in an accessible location?
- Is the key pad lit adequately so it can be seen easily at night?
- Can the vehicle keypad be reached from a car, some wheelchair users and those with mobility difficulties will not be able to get out of the car to operate the key pad. Is the key pad operable with manual dexterity issues? Is the key pad at a suitable height?
- The approach route should be safe and convenient for everyone, including older people and some wheelchair users. It should adopt the shallowest gradient that can be achieved and be step-free where possible.

In a previous comment, the A&I officer stated that the proposal needs to accord with building regulations M4(1). This note provides an access statement for the proposal, which addresses comments in the context of the policies listed by the A&I Officer.

**Relevant Planning Policy**  
**London Plan Policy 7.2**

The London Plan was adopted in 2011, and consolidated with alterations in March 2016. Policy 7.2 states:

**Strategic**

- The Mayor will require all new development in London to achieve the highest standards of accessible and inclusive design and supports the principles 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 all.
- The Mayor will assist boroughs and other agencies in implementing accessible and inclusive design in all development proposals by updating the advice and guidance in the Supplementary Planning Guidance 'Accessible London: Achieving an inclusive environment'; by continuing to contribute to the development of national technical access standards and by supporting training and professional development programmes.

**Planning decisions**

- Design and access statements submitted with development proposals should explain how, following engagement with relevant user groups, the principles of inclusive design, including the specific needs of older and disabled people, have been integrated into the proposed development, whether relevant best practice standards such as British Standard BS 8300:2009 + A1:2010 have been complied with, and how inclusion will be maintained and managed.

**LDF preparation**

- Boroughs should develop detailed policies and proposals in consultation with user groups that ensure the physical environment can meet the highest standards of accessibility and inclusion and that the principles of inclusive design are adopted at the earliest stages of the development process including when drawing up masterplans, area planning frameworks and development briefs.

## Camden Access Policy

### Camden Local Plan (adopted July 2017)

#### Policy C6

The Council will seek to promote fair access and remove the barriers that prevent everyone from accessing facilities and opportunities. We will:

- expect all buildings and places to meet the highest practicable standards of accessible and inclusive design so they can be used safely, easily and with dignity by all;
- expect facilities to be located in the most accessible parts of the borough;
- expect spaces, routes and facilities between buildings to be designed to be fully accessible;
- encourage accessible public transport; and e. secure car parking for disabled people.

The Council will seek to ensure that development meets the principles of lifetime neighbourhoods.

### Access for All CPG (published March 2019)

The document provides guidance on features to be considered in securing accessible design. This includes for approaches:

- Level or adequately ramped;
- Sufficient width and obstacle free;
- Firm, durable, slip resistant surfaces;
- Well lit and clearly identified;
- Dropped kerbs with tactile surfaces;
- Contrasting colour on bollards and street furniture;
- Wayfinding strategy; and
- Clearly displayed building name and number.

And for entrances:

- One entrance door that is accessible to all;
- Level or adequately ramped and stepped if necessary with appropriately designed handrails;
- Ramped gradients as shallow as possible;
- Level area in front of the door;
- Level threshold;
- Canopy over manual doors;
- Easy to open doors;
- Provision of electronic entrance doors; and
- Sufficiently wide doors.
- Doors to have contrast.

### Building Regulation M4(1)

For communal entrances, the regulations state that a door must have a minimum clear opening width of 775mm, that the threshold must be accessible, and that any ground surface does not impede wheelchairs. The standards for door controls are not provided, but controls for lifts must be between 900mm and 1200mm above the floor.

### Access Statement

The proposed development will be built in full accordance with building regulation M4(1), and ensure safe, secure and inclusive access for residents and visitors of St Crispin's Close. As such, it will be suitable for wheelchair users, those with manual dexterity issues, the visually impaired, and for older people.

Such matters may be reserved by a pre-commencement condition, a proposed drafting of which is provided below:

*The scheme must be built in accordance with the requirements of building regulation M4(1), and provide suitably safe and secure access to wheelchair users, those with manual dexterity issues, the visually impaired, and older people.*

### Comments in response to A&I consultation

**There is no 300mm nib on the pull side of the gate so it will not be suitable for wheelchair users.**

This will be provided as part of the scheme, and its provision may be secured by a compliance condition.

**There are no details on the opening latch and whether it will be suitable for those with manual dexterity difficulties.**

The opening latch will be suitable for those with manual dexterity issues, and will comply with relevant standards as required by the London Plan and local policy and guidance. The use of such a latch may be secured by a compliance condition.

**There is a key pad, is this accessible to those with visual impairments?**

A key pad will be provided, and will be accessible to those with visual impairments. This may be secured by a compliance condition.

**Is the key pad at an accessible height and in an accessible location?**

The key pad will be at an accessible height, and comply with Building Regulations M4(1) mentioned above.

**Is the key pad lit adequately so it can be seen easily at night?**

The key pad will be adequately lit so that it can be seen easily and night and will comply with required regulations and standards in this regard. This may be secured by a compliance condition.

**Can the vehicle keypad be reached from a car, some wheelchair users and those with mobility difficulties will not be able to get out of the car to operate the key pad. Is the key pad operable with manual dexterity issues? Is the key pad at a suitable height?**

Yes to all. The vehicle keypad will comply with all relevant policies, regulations and standards. This may be secured by a compliance condition.

**The approach route should be safe and convenient for everyone, including older people and some wheelchair users. It should adopt the shallowest gradient that can be achieved and be step-free where possible.**

The approach route will be unchanged from that which is currently existing, and will include an accessible threshold. It will comply with relevant policies and regulations. This may be secured by a compliance condition.

### **Concluding Comments**

The proposal will comply with London Plan policy 7.2, and with relevant local plan policy and guidance concerning access. It will also meet the requirements of building regulation M4(1). These details may be reserved by a compliance condition if necessary.

The proposal complies with access and inclusion matters, and there are no grounds to refuse the proposal on this basis.