

11-12 INGESTRE ROAD

PLANNING APPLICATION REFERENCE 2018/4449/P

06th FEBRUARY 2019

RESPONSE TO LONDON BOROUGH OF CAMDEN'S ACCESS OFFICER'S COMMENTS

1.0 Introduction

- 1.1 This Note has been prepared by Barton Willmore on behalf of the applicant in connection with the comments received from London Borough of Camden's ('LBC') Access Officer, Philippa Jackson (dated 6th November 2018).
- 1.2 The purpose of this Note is to provide a summary of the design team's response to the access comments received to the proposals. This Note should be read alongside the revised plans provided as referenced below.

2.0 Responses to LBC Comments on Accessibility

1. **LBC Comment:** *This application should be viewed as C3 as the units have front doors.*

Response: The determination of the Use Class is a matter of planning judgement. Given the proposed restrictions requiring the future occupiers of the development to be aged 55 and over and in need of a minimum level of care, it is often considered that proposals such as this fall with the C2 Use Class (residential institution). However, we have been advised by Planning Officers at LBC that they consider the proposal to fall within the C3 (dwelling houses) Use Class, on the basis that notwithstanding the minimum care requirement, age restriction and associated facilities each Assisted Living apartment will be self-contained with its own front door.

2. **LBC Comment:** *As this is new build 90% will need to meet M4(2) and 10M4(3), they have only 10% meeting M4(2) and (3). M4(2) and M4(3) will need to be conditioned on any planning approval. Revised plans and Access Statement will be need before any approval is given showing where the M4(2) and M4(3) units are.*

Response: Proposals are for 88% M4(2) and 12% M4(3) compliant, this is highlighted on p.58 of the submitted Design and Access Statement with typical plans shown on

p100/101. A Full breakdown of the split of units is indicated on the submitted Accommodation Schedule (Rev A).

3. **LBC Comment:** *The use of shared space is concerning in the external spaces. Full details on how the different uses will be communicated to those with visual impairments is requested along with details on the tactile paving to be installed.*

Response: These details will be included as part of the detailed design stage and, if considered necessary, their submission for approval could be secured by an appropriately worded planning condition attached to any planning permission.

4. **LBC Comment:** *Main entrance needs a covered area that accords with M4(3). Doors open outwards and no guard railing has been installed as required by AD K.*

Response: The Main Entrance is recessed creating a 1500mm covered area. Guard rails will be included as part of the detailed design.

5. **LBC Comment:** *Full height glazing and glass doors will require visible manifestation at the two levels prescribed in AD K.*

Response: These details will be included as part of the detailed design.

6. **LBC Comment:** *The reception desk will need to have a high and low section with knee recess as well as having an induction loop fitted.*

Response: These details will be included as part of the detailed design.

7. **LBC Comment:** *One of the accessible parking bays does not have a hatched zone on both sides as per requirement 3.12b. Confirmation needs to be provided that the headroom for the car parking is 2200mm as per requirement 3.12d.*

Response: This is now indicated on the updated Proposed Basement Plan ref. 27463-A-P11-00 Rev D.

8. **LBC Comment:** *Use of resin bound gravel in external outdoor space is contrary to section 3.45f.*

Response: Additional clarification has been provided on the updated Hard Landscape GA First Floor - Sheet 3 of 3 Rev A provided, to explain the surface treatment proposed for both the Private Terraces and the Private and Sunken Garden Area. We consider that the surface treatment proposed for these areas accords with Section 3.45f of the Building Regs.

- 9. LBC Comment:** *The external steps will require handrails and nosings to accord with AD K and AD M. The underside of the stairs should have guard railing to ensure it is not a collision hazard.*

Response: These details will be included as part of the detailed design.

- 10. LBC Comment:** *The ground floor communal sanitary provision should include one ambulant disabled person's cubicle within the separate sex sanitary provision set out as per diagram 21 of AD M volume 2.*

Response: The cubicles meet required size – grab rails will be included as part of the detailed design.

- 11. LBC Comment:** *One of the wheelchair accessible WC's off of the café / newsagents has a corner cut off the space which means it will not function as a wheelchair accessible WC as there is insufficient transfer space beside the WC.*

Response: Updated on Proposed Ground Floor plan provided (ref. A-P11-01 Rev D) to allow for full transfer space.

- 12. LBC Comment:** *The basement gym accessible shower and change facility needs to be reviewed to ensure that it meets the needs of those using it. Thought should be given to the equipment installed within the gym to ensure that it is useable by all users as required by the Equality Act 2010 and recent case law in this area.*

Response: These details will be included as part of the detailed design.

- 13. LBC Comment:** *Units A-G.01, A-G.02, A-G.03, A-1.01, A-1.02, A-1.03, B-1.01, B-1.02, B-1.03, B-1.04, A-2.01, A-2.02, A-2.03, b-2.01, B-2.02, B-2.03, A-3.01, A-3.02, A-3.03, A-3.05, B-3.05, B-3.01, B-3.02, B-3.03, A-4.01, A-4.02, A-4.03, A4.05, B-4.05, B-4.01, B-*

4.02, A-4.03, A-5.01, A-5.02, A-5.03, B-5.01, B-5.02, B-5.03 (2B, 4P) presuming these are all M4(2) units there are the following comments:

- a) Confirmation is sought that the glazing in the principal living area accords with 2.24c.*
- b) Walls within sanitary provisions must be capable of meeting requirement 2.26 in terms of load.*
- c) A3.05 and B3.05 both do not have a 300mm on the bedroom door.*
- d) All entrance doors should offer a clear opening width of 850mm, they only appear to offer 800mm.*

Response: A-3.05, B-3.05, A4.05 and B-4.05 are proposed to be M4(3), and regarding the respective bullets:

- a) Glazing is full height, with details to be included as part of the detailed design.
- b) This will be allowed for in the detailed specification.
- c) Revised layout of typical M4(3) Wheelchair user adaptable dwelling indicated on 27463-A-P11-20.
- d) To be reviewed and included as part of the detailed design. Revised layout of typical M4(3) Wheelchair user adaptable dwelling indicated on 27463-A-P11-20.

14. LBC Comment: *Units A-G.04, A5.04, B5.04 (1B, 2P) presuming these are M4(2) units there are the following comments:*

- a) There is no 300mm nib on the bedroom doors as required by 2.22d.*
- b) Confirmation is sought that the glazing in the principal living area accords with 2.24c.*
- c) Walls within sanitary provisions must be capable of meeting requirement 2.26 in terms of load.*
- d) All entrance doors should offer a clear opening width of 850mm, they only appear to offer 800mm.*

Response: Units A-G.04, A5.04, B5.04 (1B, 2P) are proposed to be M4(2) units, and regarding the respective bullets:

- a) Drawings reviewed and 300mm nib provided to all bedroom doors.
- b) Glazing is full height - details will be included as part of the detailed design.
- c) This will be allowed for in the detailed specification.
- d) All entrance doors changed to provide 850mm clear opening.

15. LBC Comment: *Units A-1.04, A-2.04, B-2.04, A-3.04, A4.04, B4.04 (3B, 5P) presuming these are M4(2) units there are the following comments:*

- a) Confirmation is sought that the glazing in the principal living area accords with 2.24c.*
- b) Walls within sanitary provisions must be capable of meeting requirement 2.26 in terms of load.*
- c) All entrance doors should offer a clear opening width of 850mm, they only appear to offer 800mm.*

Response: Units A-1.04, A-2.04, B-2.04, A-3.04, A4.04, B4.04 (3B, 5P) are proposed to be M4(2) units, and regarding the respective bullets:

- a) Glazing is full height - details will be included as part of the detailed design
- b) This will be allowed for in the detailed specification.
- c) All entrance doors changed to provide 850mm clear opening.

16. LBC Comment: *Units A-2.05, B-2.05, (2B, 4P M4(3)) there are the following comments:*

- a) The entrance doors do not appear to offer a clear opening width of 850mm.*
- b) Further details on the door entry controls are requested (3.22k).*
- c) Further details on the fused spur are sought as per 3.22l.*
- d) All other external doors must provide a clear opening width of 850mm for at least one door leaf with the accompanying 300mm nib.*
- e) Concern is raised over the lack of detail on radiators, especially in the entrance hall, as it will need to not impede the clear zone to the wheelchair transfer space and must not obstruct doors to room. (3.24c)*
- f) The door to the principle bedroom does not have a 300mm nib as required by 3.24f.*
- g) No detail on the power socket in the wheelchair storage / transfer space is provided.*
- h) Confirmation is sought that the glazing in the principal living area accords with 3.31c.*
- i) The kitchen layout does not demonstrate that the requirements of 3.33 and 3.34 can be met.*
- j) The units are not set out with all the furniture required by Appendix D and so clear routes cannot be ascertained. Plans should be reproduced with all the Appendix D furniture so that it can be ascertained that the space requirements can be met.*
- k) Confirmation is sought that the ceiling structure is strong enough to meet 3.35c.*
- l) The principal bedroom bed does not provide 1000mm clear access zones to both side s and the foot of the bed. (4.35e)*

- m) All rooms with sanitary provision must have ceilings and walls that can take loads as per 3.36 d and e.*
- n) A 4 bed space unit should, according to table 3.5, have a bathroom with level access shower and a separate WC / cloakroom. The separate WC/cloakroom is presumed to be the ensuite but the layout does not provide the space requirements of 3.11 or 3.14 and does not have an outward opening door. The principle bathroom does not afford the transfer spaces required. No drawings are provided to demonstrate how the bathroom can meet the wheelchair accessible requirements in the future as required by 3.42b.*
- o) Do all socket and controls meet with 3.44?*

Response:

Units A-2.05, B-2.05, A-3.05, B-3.05, A-4.05, B-4.05 are proposed to be M4(3) Compliant. Revised layout of typical M4(3) Wheelchair user adaptable dwelling indicated on 27463-A-P11-20. This addresses the comments as follows:

- a) Entrance door demonstrated to achieve clear opening width of 850mm
- b) To be included in technical design package.
- c) To be included in technical design package.
- d) Other external doors demonstrated to achieve clear opening width of 850mm.
- e) To be included in technical design package.
- f) Layout updated to achieve 300mm nib to leading edge of door.
- g) To be included in technical design package.
- h) To be included in technical design package.
- i) Length of kitchen worktop is 6750mm exceeding minimum provision for wheelchair adaptable dwelling (4730mm) and wheelchair accessible dwelling (6530mm). As such it could accommodate technical requirements in 3.34.
- j) All furniture required by Appendix D shown.
- k) To be included in technical design package.
- l) Clear access zones shown to principal bedroom.
- m) To be included in technical design package.
- n) Principal Bathroom and Ensuite shown to meet required standards.
- o) To be included in technical design package.

17. LBC Comment: *The access statement should justify why no accessible guest accommodation has been provided.*

Response: Guest accommodation updated to show accessible bathrooms and meet other accessibility requirements.