

Section 04: Access Statement

4.0 Access Statement

4.1 Introduction

4.1.1 Statutory and Regulatory Background

- 4.1.1.1 This Access Statement was prepared over the period February - May 2011 by Arup Accessible Environments at outline planning stage for the Site Wide Earls Court Site development. It satisfies Part M of the Building Regulations 2004, paragraphs .20 to .23 and the more detailed requirements of the Planning and Compulsory Purchase Act 2004 as detailed in the Planning (Applications for Planning Permission, Listed Buildings and Conservation Areas) (Amendment) (England) Regulations 2006.

In addition this application takes full account of the Mayor of London's London Plan, in particular the Supplementary Planning Guidance (SPG) "Accessible London: Achieving an Inclusive Environment" April 2004.

4.1.2 Design Philosophy

- 4.1.2.1 The design aspiration for this development is the creation of an inclusive environment throughout. All issues relating to inclusive access have been and will continue to be, considered throughout the design process.
- 4.1.2.2 Our Access Strategy is based on an inclusive model of disability. Impairments are considered as individual not categorised and as such the design philosophy seeks to achieve an inclusive design that maximises access for all disabled people. This satisfies the General Duty placed upon the Royal Borough of Kensington & Chelsea and the London Borough of Hammersmith and Fulham under the Equality Act 2010 and the London Plan to promote the interests of disabled people.

4.1.3 Disability – Definition

- 4.1.3.1 The term "disability" has been viewed in its broadest sense and includes impaired mobility, sight, comprehension and hearing. This approach addresses not only the short-term compliance with the intent of the Equality Act together with the relevant planning policies but also the long-term implications of sustainability. The aim is therefore to provide an inclusive environment throughout.

4.1.4 The Equality Act (2010) and 'Disability'

- 4.1.4.1 The Equality Act has been in force since October 2010, and replaces, amongst other legislation, the Disability Discrimination Act (DDA). However, the same underlying philosophy regarding discrimination on the grounds of disability applies, and the duties placed on the physical design of the built environment remain unchanged.
- 4.1.4.2 In summary, the Equality Act 2010 aims to protect the nine identified 'protected characteristics', of which one includes 'Disability'. With regards to Disability, the Equality Act provides legal rights for disabled people in the areas of:
- Employment
 - Education
 - Access to goods, services and facilities
 - Buying and renting land or property
 - Functions of public bodies.
- 4.1.4.3 The Equality Act, although not prescriptive, includes an intent to offer disabled people an accessible environment which does not discriminate against them because of their impairment. Statutory regulations and recommendations for the built environment provide parameters for how an accessible environment can be achieved. Compliance with these regulations and recommendations is not proof that Equality Act issues have been addressed. They do though go a long way to ensuring such issues are considered.
- 4.1.4.4 In the Act, the term 'disability' includes not only disabled people, but also people who have an association with a disabled person (e.g. carers and parents) and people who are perceived to be disabled.
- 4.1.4.5 The principles of an accessible environment contained within this document address the needs of the following user groups:
- Individuals with mobility, sight, comprehension or hearing impairment
 - The ageing population
 - People with temporary injuries
 - People whose movement may be impaired or encumbered in any way i.e. pregnant women, people with young children or people with baggage.

4.2: Process

4.2 Process

4.2.1 Considerations

- 4.2.1.1 The Access Statement will record all areas of the design that maximise access for disabled persons. It will continue to do this throughout the life of the project.
- 4.2.1.2 Should there be any departures from the adopted performance indicators the Access Statement will contain details of the reason for this decision, the details of any adopted alternative, the rationale behind it and notation detailing when any said departure was taken.
- 4.2.1.3 Additionally the Access Statement will contain details of specific inclusive design facilities or features so that end users are sufficiently aware of the reason for them and how they operate. The most current Access Statement will be one of the documents provided on hand over. To ensure the achievement of inclusive design, the following actions have been adopted:
- All design team members have been made aware of inclusive design and understand the principles involved;
 - Access will be an agenda item at design team meetings reporting the reasoning behind any departures from adopted design guide(s) and the rationale behind any alternative adopted solution or compromise, together with the authority or evidence that supports such an approach.
 - Any such departures will be recorded in the Access Statement.

4.2.2 Sources of Advice and Guidance Used

- 4.2.2.1 In order to maximise access for disabled people the following guidance has been used. Only where there is a departure from these adopted guidance will there be a reference to this in the Access Statement.
- The Building Regulations 2010 Access to and use of buildings Approved Document M.
 - The Building Regulations 2010 Protection from falling, collision and impact Approved Document K.
 - BS 8300: 2009 + A1:2010 (Design of Buildings and their approaches to meet the needs of disabled people).
 - Department for Transport (DfT), 2002, "Inclusive Mobility" (A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure).
 - Department for Transport (DfT), June 2007, 'Guidance on the use of tactile paving surfaces'.
 - Royal National Institute for the Blind (RNIB), 1997, 'Colour and Contrast: A Design Guide for the use of colour and contrast to improve the built environment for visually impaired people'.
 - Hammersmith and Fulham 'Unitary Development Plan', 2003 with adopted SPD 'Access for All', 2006.
 - Kensington and Chelsea LDF 'Core Strategy', 2010 with adopted SPD 'Access Design', 2010.
 - Mayor of London, The London Plan, 2004 with London Plan SPG 'Accessible London', 2004.
 - Consideration of Equality Act issues.
 - "Lifetime Homes", Joseph Rowntree Foundation, July 2010
 - "Wheelchair housing design guide", Stephen Thorpe and Habinteg Housing Association
 - Consideration of Equality Act (2010) issues.

4.2.3 Consultation

- 4.2.3.1 Pre-application consultation has taken place with the GLA Access Officer as well as with representatives from the Royal Borough of Kensington and Chelsea and the London Borough of Hammersmith and Fulham. This dialogue will continue through the life of the project to ensure that decisions made with regards to the inclusive nature of this development are in line with the aspirations of both the locality and the wider London area.
- 4.2.3.2 Consultation is also proposed with local disability action groups. This consultation process is currently under discussion and will follow at a later design stage.

4.3 Overview of the Statement

- 4.3.0.1 The Design Statement contains a full description of the scheme at the outline planning stage. Issues that have had an impact on access in the design of the development to date or which have been identified as likely constraints on the design as it progresses are included as part of this Access Statement. Also included will be the reasons for the constraint, any alternative solution adopted or proposed and the rationale behind the solution including any authority, research or advice that has influenced the decision.
- 4.3.0.2 The arrangements for access described in this statement reflect the current design. Access arrangements will be addressed in further detail as the design develops.
- 4.3.0.3 This appraisal is presented as a design guide, which should be used as a reference document during design development. It will demonstrate the intent of the Equality Act and compliance with the statutory regulations and best practice guidance.

4.4 Key Site Issues

- 4.4.0.1 The masterplanning for the site has been based on the provision of access for all. The site comprises a 32.22Ha area within the Royal Borough of Kensington & Chelsea and the London Borough of Hammersmith and Fulham. The site is bounded by Lillie road to the South, North End Road to the West, West Cromwell Road to the North and Warwick Road and the residential boundary lines of Philbeach Gardens and Eardley Crescent to the East.
- 4.4.0.2 The proposed on site development is a mixed use scheme comprising, but not limited to, residential, commercial, cultural, healthcare and educational elements. The design proposal will create four new villages on the site in addition to new key pedestrian links including a Broadway and a Linear Park running north/south and a 21st Century High Street running east/west.

4.4.1 Public Transport Links

- 4.4.1.1 The site is served by three London Underground/Overground stations:
- Earls Court (East): District line; Piccadily Line
 - West Brompton (South East): District line; London Overground Line
 - West Kensington (North West): District Line; Piccadily Line.
- 4.4.1.2 Of the three, Earls Court is the only one that provides step free access to all platforms although users are advised to take care due to the presence of a small gap and step up to the train from the platform. West Bormpton provides step free access to the London Overground Platforms and to its east bound District Line platforms only (again with a small gap and step up). West Kensington does not provide step free access to its District Line platforms.
- 4.4.1.3 Earls Court Underground Station has an existing disused ticket hall that the development proposes to reconfigure in order to create an additional entrance to the station. Design development will investigate methods for ensuring this entrance provides an appropriate level of access for all users. This may include provision of lifts and ramps.
- 4.4.1.4 The site also benefits from a significant London Bus service as is detailed earlier in the Design Statement. All London Buses are accessible to wheelchair users. In addition it is proposed that some bus routes will be brought into the site to further enhance the accessibility. Bus stop design on site will be developed at a later stage but will take account of the guidance given in Inclusive Mobility. The proposed development aims to utilise the good public transport links available by ensuring a direct link is provided from the transport hubs that surround the site to the main on site activities and nodal points.

4.4.2 Car Parking and Setting Down Points

- 4.4.2.1 Both on street and off street parking will be provided throughout the site. It is proposed that 1 in 10 spaces will be a dedicated blue badge (or similar, dependent on Borough preference/requirements) bay. This will include provision for residential, commercial, leisure and retail use.
- 4.4.2.2 Bays designated for blue badge holders will be enlarged to provide transfer spaces as per the guidance within Approved Document Part M and BS8300. Car parking will also provide space for hightop conversion vehicles as per the recommendations in BS8300. It is proposed that car parking will be located to serve all elements of the masterplan, The provision of parking within the site will be designed with additional reference to the recommendations made in the Mayor of London (2006) 'Blue badge parking standards for off-street car parking'.
- 4.4.2.3 Drop off and pick up points will be provided throughout the site located close to the proximity of building entrances and exits. Drop of points will be designed to include suitable kerbs and tactile paving where appropriate.
- 4.4.2.4 Cycle parking on site should include provision for the storage of adapted cycle storage.

4.4: Key Site Issues

4.4.3 Pedestrian Movement

4.4.3.1 **Gradients:** The site has existing conditions that include underground rail lines as well as railway sidings. In order to overcome these barriers to general access (that currently segregate the site into two areas), the overall site must rise to +12m from +7.6m to the east at Earls Court Station/Warwick Road and from +4.0m to the west on North End Road. The change in level has, in specific locations, resulted in gradients that are steeper than recommended by current guidance. Fig 4.0.1 outlines the extent of the sites gradients.

4.4.3.2 As indicated by fig 4.0.1 the majority of gradients will be shallower than 1:21, however a number, represented by the orange routes, are 1:20 or steeper. These routes are those affected by the constraints mentioned previously. Design development is ongoing, and in these areas means of improving access is being discussed, and may include the following provisions:

- The use of stairs, ramps and lifts to overcome steeper gradients: Design development will investigate how the implementation of the previously mentioned features could aid movement for all people across more challenging areas of the site. It is expected this will be of particular importance within Exhibition Square at the entrance to Earls Court Station, where the use of the space will influence the means by which movement occurs and is made suitable to all users.
- Introduction of alternative routes: Where steeper gradients run along side larger development plots, such as those routes leading from the Lost River Park, it may be possible to introduce secondary routes running at shallower gradients. These routes would provide an alternative for those unable to comfortably manage the steeper routes.
- Seating and rest areas: In all areas where gradients may make movement difficult for some people it is proposed that design development will provide additional level rest areas and seating.

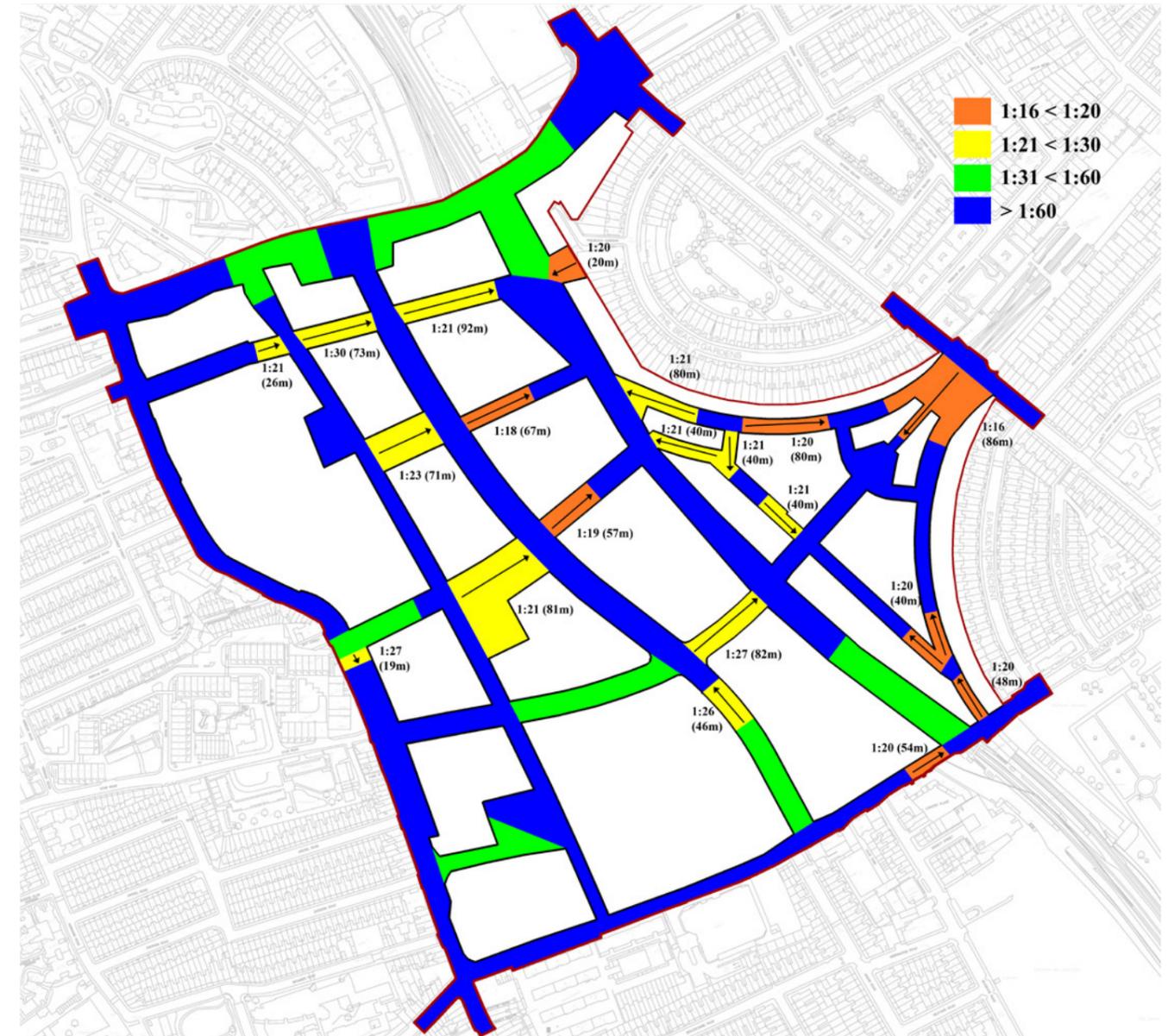


fig 4.0.1: Illustration of site gradients

4.4: Key Site Issues

4.4.3.3 **Walkways:** It is proposed that all of the roads within the development will have paved walkways alongside them. It is proposed that the walkways will be designed with recourse to DfT 'Inclusive Mobility' Section 3. Pedestrian walkways will not be narrower than 2000mm at any point. Adequate crossing points have been proposed and will include dropped kerbs/raised tables and tactile paving. Paving chosen for walkways should be slip resistant and avoid loose fitting materials. Walkways within the less formal environments such as the Lost River Park may differ in composition but will follow the same general principles to ensure that they do not create a barrier to access for pedestrians.

4.4.3.4 **Shared Space:** In a number of locations (see fig 4.0.2) a shared space is proposed. This area will provide an area shared by pedestrians, cyclists and local traffic. The use of a shared space, along with deliberate placement of street furnishings and planting schemes, will have a traffic calming affect.



figure 4.0.2: Proposed location of shared spaces

4.4.3.5 It is proposed that within the shared space, a safe space will be created. This safe space would consist of an area running along the length of the shared surface that is marked by a delineator. The delineator would act as a guide for the vision impaired and blind. The type of delineator used will be fully developed at subsequent design stage and would likely involve some area of raised walkway above the level of the shared carriageway. It is proposed that the method of safe space developed will take on board the results of ongoing testing by guide dogs for the blind. Any delineator that is chosen should provide a clear marker for the vision impaired and blind whilst also not adversely affecting the movement of wheelchair users and ambulant disabled people.

4.4.3.6 **Steps, Stairs and Ramps:** Steps and stairs may be incorporated into the masterplan to aid movement, particularly in areas of steeper gradients. Stairs on site should be straight with uniform risers between level landings in line with the guidance given in Inclusive Mobility and Approved Document Part M. Tactile paving should be incorporated at the head and foot of the stair and a slip resistant, contrasting nosing should be provided on the tread and riser. Handrails should also be provided to either side of the stair, in line with Inclusive Mobility and Approved Document Part M.

4.4.3.7 Where steps are provided an alternative means of step free access will be included. This will usually be provided by formal ramps. All formal ramps that compliment stairs should be designed to Inclusive Mobility and Approved Document Part M standards.

4.4.3.8 **Crossing Points:** It is proposed that regular crossing points will be positioned on all of the main routes within the development. They will either be controlled or uncontrolled, depending on the perceived volume of traffic expected. The uncontrolled crossings will either be a dropped kerb (1200mm minimum width) or a raised table (2400mm minimum width), both with tactile indicators as recommended in DfT 'Inclusive Mobility'.

4.4.3.9 The controlled crossings will either have dropped kerbs (2400mm minimum width) or raised tables (2400mm minimum width) and tactile paving.

4.4.3.10 **Tactile Paving:** All crossing points will incorporate tactile paving, whether controlled or uncontrolled, with a dropped kerb or a raised table. If the crossing is approached head on then the depth of the tactile paving should be 1200mm, elsewhere it should be 800mm. At uncontrolled crossings only, where possible, on side roads the dropped kerb should be inset and to a depth of only 400mm. At a controlled crossing, only a stem of the surface, 1200mm in width, should extend from the flush dropped kerb to the back of the footway or building line. It should extend back from the dropped kerb adjacent to the push button control box or zebra pole. For large pavements it may not be practical to extend to the back of the pavement and consultation should be taken with local disability groups as to the perceived need, although 5000mm is generally considered an acceptable length (see 'Guidance on the use of tactile paving surfaces', DETR, figure 3 and associated text section 1.5.1.2).

4.4.3.11 For a controlled crossing the tactile paving should be red in colour, for an uncontrolled crossing it should contrast sufficiently with the surrounding paving but not be red.

4.4: Key Site Issues

- 4.4.3.12 **Raised Junction:** Raised table junctions are being considered at a number of cross roads within the proposed development. The purpose of the raised table is to improve the ease of crossing for Mobility Impaired People. However a raised junction can have an adverse affect on access for vision impaired and blind pedestrians unless adequate safety provisions are provided. Therefore it is proposed that at raised junctions crossing points will be clearly marked with the correct tactile paving and all other areas will be subject to delineators such as a kerb upstand.
- 4.4.3.13 **Seating:** Adequate seating will be provided throughout the site. Resting places and seating should be provided at regular intervals, in line with inclusive mobility recommendations (with an increase in frequency on routes with steeper gradients). Wherever possible, seating protruding into or located on the walking area, should be kept to a minimum. If provided, they should be adequately colour contrasted with the critical surface against which they will be viewed. Materials which are cold to the touch should be avoided.
- 4.4.3.14 The detail of the seating will be developed at subsequent design stages however it should provide firm back and arm rests whenever possible.
- 4.4.3.15 **Signage:** A signage strategy for the development will be developed at a future design stage. The signage strategy adopted for the development will be critical to ensuring that everyone can easily navigate their way around the site. It is imperative that all signage is accessible for as wide a range of people as possible.
- 4.4.3.16 The system of signage should be complementary to the environment, providing a simple and consistent method for people to find their way.
- 4.4.3.17 Signage is a very important access tool for people who are deaf or hard of hearing. Visually impaired people and individuals with language and learning disabilities require signs to be designed in specific ways, which may include the provision of embossed signage and supplementary Braille information. By addressing the needs of disabled people, the signage system will be of benefit to everyone. Signage should be clear, concise and consistent, as described below:
- 4.4.3.18 **Clear:**
Easy to see and understand, with large print in a clear typeface, with good contrast and low glare. People with learning disabilities would benefit from an increased use of pictures on signs, in addition to or independent from text.
- 4.4.3.19 **Concise:**
Simple, short and to the point.
- 4.4.3.20 **Consistent:**
Signs representing the same thing should always appear the same.

4.5 General Consideration for Specific Spaces and Building Types

- 4.5.0.1 The following outlines general considerations that should be applied to the design of specific building types proposed on the development site. Design development will ensure that these elements are designed to meet the appropriate standards that will ensure they are inclusive environments throughout.

4.5.1 Education Facilities

- 4.5.1.1 Educational buildings should be accessible for students, staff and visitors. This includes all teaching and recreational areas.
- 4.5.1.2 Lecture theatres, auditoriums, stages and classrooms should be designed to be accessible for students and for staff. Routes between the stage areas of a lecture theatre or auditorium to the audience seating area, as well as to ancillary areas or facilities used by the presenters should be accessible.
- 4.5.1.3 Study areas should contain adjustable furniture where ever possible. This will allow a person to adapt their environment according to individual needs and requirements.
- 4.5.1.4 All teaching spaces should be located away from noise, and the acoustics of each space should be considered carefully. Teaching spaces should be well lit, allowing both natural and artificial light, and general and task specific lighting.
- 4.5.1.5 The design should take full consideration of the intent of the Special Educational Needs and Disability Act 2001 (SENDA).

4.5.2 Healthcare Facilities

- 4.5.2.1 All healthcare facilities will be designed to provide the highest level of access in keeping with the general requirements for such facilities. This will apply to any healthcare facilities provided as part of the masterplan.
- 4.5.2.2 Additional design information will be taken from Department For Health 'Health Building Notes'.

4.5: General Consideration for Specific Spaces and Building Types

4.5.3 Recreation and Entertainment Facilities

- 4.5.3.1 All recreation and entertainment facilities should be designed as accessible for both performers and for spectators, and for staff and visitors. This should include access to the stage or performance area, as well as sufficient seating provisions for both disabled and non-disabled people.
- 4.5.3.2 Routes between stage/performance areas and audience seating areas should be accessible, as should routes to ancillary areas or facilities used by staff, performers or spectators.
- 4.5.3.3 In sport facilities, some wheelchair users may require use of sports wheelchairs, which are larger than day wheelchairs. For venues where wheelchair sports are expected, more space will be required along access routes and wider doors should be provided. Additionally, consideration should be given to storage areas for wheelchair users to leave their day chairs during their visit.

4.5.4 Religious Spaces

- 4.5.4.1 All religious rooms and buildings should be accessible for those who use and work there. Where seating is provided, consideration should be given to the provision of removable seating, in order that wheelchair users can be accommodated amongst the general congregation.
- 4.5.4.2 To assist people who are deaf or hard of hearing, areas for worship should be provided with a hearing enhancement system.

4.5.5 Residential Accommodation

- 4.5.5.1 **Lifetime Homes:** Lifetime Homes Standards consist of 16 design standards which aim to make homes more flexible, convenient, safe and accessible. These standards include such aspects as, communal stairs, door widths, toilets and window glazing.
- 4.5.5.2 Lifetime Homes offer the choice to people who have acquired an impairment to remain in their home. They are not designed with the additional spatial requirements a wheelchair user needs. They are designed to accommodate the majority of adaptations with maximum ease, at minimum cost.
- 4.5.5.3 All residential accommodation within the development will be designed to be Lifetime Homes compliant, in accordance with the requirements of the Mayor's London Plan.
- 4.5.5.4 **Wheelchair Accessible Housing:** A minimum of 10% of residential accommodation will be designed spatially as wheelchair accessible units in accordance with the requirements of the Mayor's London Plan. The design of these residential units will follow the guidance given in Thorpe and Habinteg 'Wheelchair Housing Design Guide', as per the guidance given in the London Plan. They will also take account of any Local Authority specific design guidance.
- 4.5.5.5 Wheelchair accessible units should be located so as to provide a variety of views and experiences, with an equal choice of accommodation.

4.5.6 Retail Units

- 4.5.6.1 All retail units (including restaurants, cafes, shopping and service facilities, merchandise and food points) should be step-free and accessible for both staff and customers.
- 4.5.6.2 Payment counters and servery areas should be located at an accessible height from the floor and be provided with knee recesses.
- 4.5.6.3 When designing an accessible retail environment consideration should also be given to (although not restricted to) the following areas / facilities:
 - Outdoor Dining
 - Entry and associated outdoor waiting area
 - Pedestrian and vehicular circulation systems, parking and valet areas
 - Drive through windows and associated equipment and stacking lanes

4.5.7 Spectator/Audience Seating

- 4.5.7.1 All spectator and audience seating should be designed to be accessible. It is essential that barriers, fencing and balustrades do not obscure sightlines, this is particularly important for people who may not be able to change their position due to their impairment. Seating should contrast visually with the surrounding surfaces.
- 4.5.7.2 Wheelchair user viewing areas should be provided, in addition to amenity seating (for people who have visual impairments or for those that have limited movement). A percentage of these should include additional legroom (to allow for people who find it difficult to straighten their legs or for an assistance dog to rest in front of or under the seat).
- 4.5.7.3 All seating areas for disabled people should be flexible to allow different seating layouts and options, as well as to offer a variety of views and vantage points. Seating should be provided with reasonable sightlines when seated - this is particularly important for people who may not be able to change their position.
- 4.5.7.4 An agreed percentage of removable / retractable seating should also be provided to maximise wheelchair accessible spectator seating. Figures should be based on BS8300 and Sports England (where appropriate) guidance.

4.6: Maintenance of Features

4.5.8 Transient Lodgings

- 4.5.8.1 Transient lodgings include buildings such as hotels, guest houses and student accommodation. A minimum of 10% of all transient lodgings should be accessible.
- 4.5.8.2 Wheelchair accessible rooms are required to be located to provide a variety of views and experiences (location, height, price), with an equal choice of accommodation (including a range of bedroom types). Wheelchair accessible rooms should also be located close to the circulation cores and should be en suite. All rooms on upper levels should be accessible by means of lifts, for use by both room occupants and visitors.
- 4.5.8.3 The design of Transient Lodgings on the site will be developed with additional reference to the recommendations made in the Mayor of London (2010) 'Accessible Hotels in London: Appendix B Draft Best Practice Guidance'.

4.6 Maintenance of Features

- 4.6.0.1 The completed Access Statement will contain a record of features and facilities designed to maximise accessibility with sufficient information to ensure their proper use.
- 4.6.0.2 Where there have been necessary constraints on inclusive design these will be detailed and all relevant background information supplied as part of the Access Statement. This will enable the Royal Borough of Kensington & Chelsea and the London Borough of Hammersmith and Fulham to demonstrate, in the event of an individual claiming they have been unreasonably discriminated against under the Equality Act, that a reasoned process was employed in delivering a reasonable level of access.

4.7 Conclusion

- 4.7.0.1 Design development will aim to maintain and improve accessibility throughout the site. The Earls Court site has been designed with inclusive access in mind, and has taken into account relevant policy, regulations and good practice. This will be developed further at future design stages.
- 4.7.0.2 This access statement has explored both access and egress to and around the site as well as within the site itself. At present options are being considered to ensure the site provides an inclusive environment. Further access assessment and consultation will be required during future design progression and reserved matter approvals.