

ST ANN'S NEW NEIGHBOURHOOD PHASE 1B & 2

Access Statement

December 2023

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File name:231122 ST ANN'S PHASE 1B&2 DBA ACCESS STATEMENT_03b

ST ANN’S

Access Statement

November 2023

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Issue date	Draft number	Draft by	Check by	Amended by	Notes	Sent for review to:
21.07.23	01	ER			First draft	Project team
17.11.23	02	ER		ER	Updated as per team comments	Project team
22.11.23	03	ER		ER	Updates as per client comments	Project team

Contents

1.	Introduction	5
2.	Relevant standards and policy	7
3.	Overview of proposals	11
4.	Arrival and external environments	13
5.	Residential Communal Elements	18
6.	Accessible housing	24
	Appendix 1 References for inclusive design	31

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1. Introduction

This Document has been prepared by David Bonnett Associates on behalf of Peabody Trust, Catalyst by Design and Hill Residential Limited ('the Applicant') in support of a Reserved Matters application for the approval of reserved matters respect of appearance, landscaping, layout and scale relating to Phases 1b and 2 associated with the outline component of planning permission HGY/2022/1833 for "*Outline planning permission (with all matters reserved except for access) for Phases 1B, 2 and 3, for: (a) the erection of new buildings for residential development (Use Class C3) and a flexible range of non-residential uses within Use Class E, F1/F2; (b) provision of associated pedestrian and cycle accesses; (c) landscaping including enhancements to the St Ann's Hospital Wood and Tottenham Railsides Site of Importance for Nature Conservation (SINC); and, (d) car and cycle parking spaces and servicing spaces.*"

In particular, this document addresses the requirements of Condition 67 (Accessible Housing) of the hybrid consent reference HGY/2022/1833.

Phases 1b and 2 covers Plots E to J on the illustrative masterplan.

The site is bounded to the south by the Overground railway line and the rear gardens of properties in Warwick Gardens to the west. The site is bounded to the east by the refurbished St Ann's Hospital site, the hospital buildings range from 2-3 storeys and vary in style, including a new build elements and refurbished post war buildings. The remainder of the local area is predominantly residential in character with buildings of varying styles and age. There are more recent flatted blocks abutting the north-east corner of the site, which range in height from four to seven storeys.

The site has a relatively flat topography with a gentle fall west to east and north to south. The Environment Agency's (EA) 'Flood Map for Planning' shows that the Site falls wholly within Flood Zone 1 and is therefore at low risk of flooding.

The purpose of this report is to describe how Phases 1b & 2 of the outline component of the hybrid application at St. Ann's Hospital has been designed with consideration and understanding of the principles of inclusive design, and show that the level of access provisions are reasonably provided in context with the purpose of the scheme.

The Report concludes that the Proposed Development will deliver a scheme with the highest standards of accessible and inclusive design, where all users, regardless of their age, or disability, can enjoy the development, and participate comfortably and independently in line with Policy D5 Inclusive design of the London Plan 2021.

DBA does not anticipate any access issues arising as the scheme is developed to a more detailed stage provided that careful consideration continues during the design development process and that consultations are undertaken with the relevant parties.

1.1 Method of review

The Access Statement describes the access provisions using a journey around the Proposed Development as follows:

- Arrival at the site;
- Approaches to the building;
- Entrance ways;
- Horizontal and vertical circulation;
- Access to facilities;
- Typical residential layouts; and
- The emergency evacuation strategy.

The report is based on a review of the proposals by Karakusevic Carson Architects and Adams & Sutherland landscape architects.

Step-free external and internal routes, lifts, stairs, WCs and other access features are highlighted on access overlays throughout this Access Statement.

The statement does not describe or evaluate any part of the development that is used solely for inspection, repair or maintenance of any service or

fitting, in accordance with Approved Document M. If a disabled person requires access to these areas as part of their work then their employer is expected to take all reasonable steps to ensure that there are no barriers to them carrying out their work. Any building adjustments that are required would be carried out at that time.

2. Relevant standards and policy

2.1 The standards

The current standards of the Approved Document Part M Volume 1 & 2 will be the applicable standards for the scheme in relation to access and inclusive design.

- *The Building Regulations 2010, Approved Document M (Access to and use of buildings) Volume 1: Dwellings*, HM Government, 2015 edition incorporating 2016 amendments. (Hereafter referred to as AD M Vol1).
- *The Building Regulations 2010, Approved Document M (Access to and use of buildings) Volume 2: Building other than dwellings*, HM Government, 2015 edition. Note: Amendments to AD M Volume 2 published in July 2020 take effect on 1 January, 2021 (Hereafter referred to as AD M Vol2).

2.2 Policy

The following list sets out the national, regional and local policy regarding access and inclusive design that applies to the scheme.

- **National Planning Policy Framework (NPPF), Chapter 8 and 12**, Ministry of Housing, Communities and Local Government, 2021.

The NPPF sets out government’s planning policies for England and how these are expected to be applied.

Chapter 8 reads:

92. Planning policies and decisions should aim to achieve healthy, inclusive and safe places

Chapter 12 reads:

130. Planning policies and decisions should ensure that developments:

f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users, and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

- **The London Plan: Spatial Development Strategy for Greater London - Policy D5 Inclusive design**, Mayor of London, March 2021.

The London Plan describes the expected standards of accessibility in all new developments in London. Policy D5 Inclusive design states:

- Development proposals should achieve the highest standards of accessible and inclusive design. They should:*
- 1) be designed taking into account London’s diverse population*
 - 2) provide high quality people focused spaces that are designed to facilitate social interaction and inclusion*
 - 3) be convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment*
 - 4) be able to be entered, used and exited safely, easily and with dignity for all*

- **Strategic Policies 2013-2026**, London Borough of Haringey, 2017.

The Haringey Local Plan sets out the council's strategy for achieving the long term vision for Haringey and includes high-level strategic policies used in determining planning applications.

SP2: Housing

Excellence in design quality and sustainability will be required for all new homes. High quality new residential development in Haringey will be provided by ensuring that new development:

4. 90% of new housing meets Building Regulation requirement M4(2) 'accessible and adaptable dwellings' and 10% meeting Building Regulations requirement M4(3) 'wheelchair user dwelling', ensuring they are designed to be wheelchair accessible or easily adaptable for wheelchair users. Units should range in size to accommodate various living needs including growing families and live-in carers.

SP11: Design

All new development should enhance and enrich Haringey's built environment and create

places and buildings that are high quality, attractive, sustainable, safe and easy to use. To achieve this all development shall:

- *Promote high quality landscaping on and off site, including improvements to existing streets and public spaces;*
- *Seek the highest standards of access in all buildings and places.*

- **Development Management Policies DMP**, London Borough of Haringey, 2017.

The DPD sets out planning policies that help to determine which developments are granted planning permission in Haringey.

Policy DM1: Delivering High quality design:

All new development and changes of use must achieve a high standard of design and contribute to the distinctive character and amenity of the local area. The Council will support design-led development proposals which meet the following criteria:

e) Are inclusive and incorporate sustainable design and construction principles.

Policy DM2: Accessible and safe environments

Proposals should ensure that new developments:

a) Can be used safely, easily and with dignity by all;

b) Are designed so that the layout improves people's access to social and community infrastructure, including local shops and public transport;

c) Protect, improve and create, where appropriate, safe and accessible pedestrian and cycling routes and should not impede pedestrian and cycling permeability.

2.3 Other references for inclusive design

Other documents referred to during the design of the scheme include:

- *Housing Supplementary Planning Guidance, London Plan 2016 Implementation Framework*, Mayor of London March 2016.
- *Shaping Neighbourhoods Accessible London: Achieving an Inclusive Environment Supplementary Planning Guidance*, London Plan 2011 Implementation Framework Mayor of London, October 2014.
- *The Building Regulations 2010, Approved Document K (Protection from falling, collision and impact)*, HM Government, 2013 edition.
- *British Standard 8300:2018 Design of an Accessible and Inclusive Built Environment, Part 1: External Environment - Code of Practice, Part 2: Buildings - Code of Practice*, British Standards Institution, 2018.
- *British Standard 9999:2017 Code of Practice for Fire Safety in the Design, Management and use of Buildings*, British Standards Institution, 2017.
- *Inclusive Mobility: A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure*, Department for Transport, December 2021.

- *Inclusive Urban Design: A guide to creating accessible public spaces*, David Bonnett Associates, BSI, 2013.
- *London Cycling Design Standards*, TfL, 2016.
- *A Guide to Inclusive Cycling* (second edition), Wheels for Wellbeing, 2019.
- *Cycle Infrastructure Design: Local Transport Note 1/20*, Department for Transport, 2020.
- *The principles of inclusive design*. CABI, 2006
- *Designing for Accessibility*, CAE/RIBA Publishing, 2012.
- *Easy Access to Historic Buildings*, Historic England, 2015.

Note:

DBA provides guidance and advice as access consultants. The consultancy does not officially approve designs, nor does it provide confirmation that a design complies with statutory standards. This remains the responsibility of the designers and the approvals authority.

2.4 Interpretation of the standards

Approved Documents M, K and BS 8300:2018

provide general access advice, but refer to other standards and regulations about specific aspects of buildings and their immediate surroundings. Therefore, several separately authored documents are referred to, including good practice guidance books written by specialists.

There are no national regulatory controls governing extended external spaces and landscaping other than Best Practice Guidance. For primary routes and approaches to buildings Approved Documents M are taken as a bench mark for determining accessibility. With regards to streetscape and pavement design, guidance is provided by the Department for Transport’s Inclusive Mobility Guide and Transport Notes and BS8300:2018, Part 1: External Environments.

Access standards are in a continuing state of development because of changing expectations and legislation. The nature of these changing requirements and standards can result in anomalies and contradictions. Therefore it is important that access and inclusivity are considered and refined throughout the design process. The design of the

scheme should seek to interpret these standards to provide the best possible level of inclusive design and this Access Statement describes situations and solutions where interpretation may be necessary.

2.5 The Equality Act

The Equality Act 2010 ('the Act') combines and supersedes previous separate discrimination legislation (including the Disability Discrimination Act 1995 as amended ('the DDA') and the disability discrimination provisions of SENDA 2001 for England, Wales and Scotland. People are protected from discrimination and harassment based on 'protected characteristics'; victimising anyone as a result of action taken in connection with the Act is also unlawful. There are nine different protected characteristics under the Act which have different levels of protection depending on the context (such as employment, provision of goods and services or the provision of education). This Access Statement focuses on the protected characteristic of disability; the definition of disability is essentially the same as under the DDA.

The types of discrimination that can arise in relation to disability are:

- Direct disability discrimination;
- Indirect disability discrimination;
- Treating disabled people unfavourably because of something arising in consequence of their disability without justification; and
- A failure to make reasonable adjustments for disabled people ('the RA duty'). The RA duty works in different ways depending on who requests the reasonable adjustments to be made, for example an employee or a member of the public.

The Act also provides protection for people who are treated less favourably because of their relationship with a disabled person (such as a carer) or for people treated less favourably because they are mistakenly believed to be disabled. A disabled person can always be treated more favourably than a non-disabled person.

If an employer is a listed public authority (such as a local authority) they will be subject to the public sector equality duty. If the employer is not a public authority but carries out a public function as part of its work, it will be covered by the general part of the equality duty in relation to the exercise of that function.

2.5.1 The Reasonable Adjustment Duty and specific building provisions

The Equality Act does not contain any specific requirements for the built environment and therefore has no relevance to 'compliance' in respect of physical building standards.

2.5.2 Statutory Consents

When considering a reasonable adjustment to a physical feature, the Act does not override the need to obtain consents such as planning permission, building regulations approval, listed building consent, scheduled monument consent and fire regulations. If the consent is not given, there is still a duty to consider a reasonable means of avoiding the feature.

2.5.3 Design standards

Service providers and public authorities carrying out their functions do not have to remove or alter a physical feature of a building for a period of 10 years from construction or installation if it accords with the relevant objectives, design considerations and provisions in Approved Document M. They may still need to consider a reasonable means of avoiding the feature if it presents a barrier to inclusion.

3. Overview of proposals

3.1 Phases 1b & 2

Phases 1b & 2 comprises 5 tenure neutral development plots (Plots E - J) delivering 464 mixed tenure dwellings.

- Plot E is located along the western boundary facing the Primary Street West and provides 14no. 4-Bedroom London Affordable Rent houses.
- Plot F consists of two buildings, Building F1 facing the Primary Street West and building F2/3 facing the Green Link. These buildings form a semi private courtyard between them.
- Plot G consists of two buildings linked by a single storey element, located at the south west of the site boundary.
- Plot H consists of 2 L-shaped buildings forming a semi private courtyard between them.
- Plot J consists of three independent buildings located at the south east of the site boundary.



Fig.1 Phase 1b & 2 Overview (Extracted from DAS)

3.2 Access aims

The Proposed Development aims to deliver a scheme with the highest standards of accessible and inclusive design, where all users, regardless of their age, or disability, can enjoy the development, and participate comfortably and independently in line with Policy D5 Inclusive design of the London Plan 2021.

The Proposed Development has taken into account London's and visitors' diverse population and considered the requirements of the wider community including:

- People with mobility impairments;
- People with vision impairments;
- People with neuro-diverse requirements;
- Deaf people;
- Older people; and
- Small children.

The meaning of 'disabled' in this Access Statement is as defined by Equality Act 2010.

The inclusive design principles that have driven the proposals include:

- Placing people at the heart of the design process;
- Acknowledging diversity and difference;
- Offering choice where a single design solution cannot accommodate all users;
- Providing for flexibility in use; and
- Providing buildings and environments that are convenient and enjoyable to use for everyone.

3.3 Summary of access provisions

The key access provisions for the proposed development include:

- **Pedestrian routes** designed to be safe and inclusive for all pedestrians. Routes will be step-free, level or gently-sloping with gradients at 1:21 or gentler.
- **Car parking** - Accessible on-street car parking spaces will be available in close proximity to building entrances.

- **Drop-off** will be possible in close proximity to building entrances.
- **Cycle parking** - accessible cycle parking in line with the London Plan and London Cycling Design Standards.
- **Entrances** to buildings will be clearly distinguished on the facade to facilitate orientation and wayfinding.
- **Step-free access** to all parts of the buildings, including residential amenities.
- **Lifts** - Access to a second lift for all residents.
- **Accessible housing** - 90% of dwellings designed to meet Building Regulation M4(2), and 10% of the dwellings designed to meet building regulation M4(3) as required by condition 67 of the hybrid consent.
- **Emergency Escape** - provision of an evacuation lift on each lift core to allow all building users to be able to make a dignified escape.

4. Arrival and external environments

4.1 Public transport connections

The existing St. Ann’s development site has a Public Transport Accessibility Level (PTAL) of 1/2 which is defined as poor access to public transport. The PTAL is an indication of the frequency, reliability and distance of public transport services close to a site; it does not take the accessibility of transport services into account. However, the PTAL is important to the access strategy because it is used to evaluate the reliance on cars that current and future users of the building are likely to have, with the implication that less reliance on cars corresponds to a greater reliance on public transport. Additionally, measures including the new South-West Link have sought to improve the PTAL rating and the principle of this has been set out in the hybrid consent.

Phase 1b & 2 are situated to the south of St. Ann’s development, c. 300 m from St. Ann’s Road. Bus services run along St. Ann’s Road with bus stop providing services to Wood Green and Kingsland and to Edmonton and Waterloo.

All London buses (except two ‘heritage’ routes) are accessible buses that ‘kneel’ to minimise height differences between the bus floor and pavement, and have ramps and space inside for wheelchair and

pushchair users. However, not all disabled people can use them and therefore setting-down bays for taxis and private cars are essential.

Closest rail and London tube services to the site are Seven Sisters Station (Zone 3), at 1.5 km to the south west, South Tottenham Station (Zone 3) at 1.9 km to the west, Harringay Green Lanes Station (Zone 3) at 1.3 km to the east, and Harringay Station (Zone 3) 1.7 km to east. South Tottenham Station and Harringay Green Lanes provide step-free access from street to platform, and access from platform to train is by manual boarding ramp. Seven Sisters Station and Harringay Station do not provide step-free access.

Since, not all public transport services close to the site are accessible, and the accessible public transport is not accessible for all, the proposed development has made the following provision for alternative means of access to the site, which are described in the sections that follow:

- suitable drop off points close to the entrances of all buildings;
- accessible car parking for all uses close to the buildings they serve;
- accessible cycle storage in all buildings.

4.2 Drop-off points

Some users will rely on community transport, taxis or minicabs. All building entrances are accessed directly from the street . Due to the very low traffic neighbourhood, designated drop-off points are not provided. It is expected that people will be able to be dropped-off/picked up at any point, and within 50 metres from any entrance.

4.3 Car parking

Phases 1b & 2 of the St. Ann’s New Neighbourhood will provide 59 on-street car parking spaces along the proposed new streets across the site. The provision is in line with Policy T6 Car parking of the London Plan 2021. For further details please refer to the Transport Consultants Report.

The accessible car parking provision is as follows:

- 15no. disabled car parking bays provided from the outset dedicated to the M4(3) residential units, spread across the site to ensure that disabled bays are within 50 metres to the building they serve. This represents 3% of the total number of residential units (464 units).

- The scheme has the potential to provide additional disabled bays for the 2% of the total number of residential units (10no. potential bays) by re-purposing the standard bays, as agreed with the LB of Haringey during pre-apps meetings.
- 1no. disabled car parking bays dedicated to the non-residential uses on the north east of the Phase 1b & 2 site.

Disabled car parking spaces will meet dimensional and other specifications set out in BS8300-1 and local authority requirements.

Routes from the disabled parking bays to the buildings will be along wide public pavements with level or gentle gradients and with a suitable firm ground surface.



Fig.2 Car parking strategy (Extracted from Phase 1b & 2 Car Park management Plan by Markides Associates)

4.4 Cycle parking

Cycle parking is proposed to be provided in sheltered and secured stores on the ground floor of each building. Cycle parking for the townhouses on Plot E are provided within the curtilage of each dwelling.

The cycle parking provision is in line with the London Plan with layouts designed in line with the London Cycling Design Standards (LCDS), comprising the following:

- 5% of the total cycle spaces will be larger spaces that can accommodate larger cycles, including adapted cycles for disabled people;
- 20% of the total cycle spaces will be Sheffield stand types for people with non-standard bicycles and those that struggle to use two tier systems;
- 75% of the total cycle spaces are proposed as gas-assisted two tier racks.

Further details on how this will be implemented is set out within the Design and Access Statement.

Residential long-stay cycle parking is divided in several stores to better serve each core and make a more efficient use of the space. Sheffield stands and larger cycle spaces have been distributed across all cycle stores to ensure an even split to all blocks. That has resulted in some cases cycle storage for larger cycles are provided within covered and secured storage at the courtyards.

Long-stay cycle parking for non-residential uses has been integrated in the landscape.

Routes from the cycle parking to the buildings will be level or gently sloping, with a suitable firm ground surface and kept to the shortest as possible.



Fig.3 Ground floor showing cycle store locations (Extracted from DAS by KCA)

4.5 Pedestrian Access / Public Realm

Approaches to all buildings are from proposed public footpaths. Footpaths will be at least 2m wide as recommended by BS8300-1 and the Inclusive Mobility. Footpaths are separated from the carriageway by a raised kerb. Pedestrian crossings are proposed to be raised tables at the junctions and there will be provision of dropped kerbs at the informal crossings along the streets.

Trees and other street furniture have been placed alongside circulation routes so they do not create barriers or hazards for people with impaired vision.

Ground surfaces along footways are proposed firm, non-slip and even.

4.6 Landscape / Courtyards

St. Ann's New Neighbourhood is to create a network of green spaces that will link the areas of the development while adding ecological value.

All green spaces have been carefully designed in consideration with the requirements of all users, regardless their abilities or age, so that they can be comfortably and independently used by residents, people working in and visiting the development, and the wider community, in line with *Policy D5 Inclusive design* of London Plan 2021, Strategic Policy *SP11: Design* and *Policy DM2: Accessible and safe environments* of the London Borough of Haringey 2017.

The main access provisions to ensure the comfort of all pedestrians using the landscape are to include:

- Main footpath will be at least 1800mm wide, and where possible 2000mm wide, and secondary routes will not be less than 1200mm;
- Routes will be generally level or gently sloping, with gradients between 1:21 and 1:60, and level landing at every 500mm rise. Cross-falls will not exceed 1:50.

- Primary routes will have walking surfaces that are firm and smooth. Uneven surfaces, surfaces of loose materials, or surfaces with large gaps between paving materials will be avoided.
- Footpaths will have continuous detectable physical edges which people who are blind or partially sighted can follow.
- Bridged footpaths will have handrails and upstands of at least 150mm high at both edges.
- Resting areas will provide a variety of seating options, including seating with armrests and backrests, seating with different seat height, and seating that allows wheelchair users to transfer to a bench.



Fig.4 Landscape proposals (by Adam & Sutherland Landscape Architects)

5. Residential Communal Elements

All buildings within Phase 1b & 2 have been designed considering the same access principles. These are described in the sections that follow.

All residential communal areas have followed the guidance from Approved Document M Volume 1 and meet the provisions of Section 3A: Approach to the dwelling of AD M Vol. 1.

5.1 Entrances

Entrances to the buildings are proposed centrally to the facades, and recessed, so that entrances are clearly identifiable and also provide shelter to the entrance area. Each building will have their individual character which will assist visitors and residents navigating the site and identifying the correct arrival point.

All entrances have been designed in accordance to provisions of paragraph 3.14 of AD M Vol.1 including a level landing of at least 1500x1500mm in front of the entrances outside, weather protection of at least 1200mm depth, and provision of a 1500mm turning circle inside the entrance area.

All entrance doors provide a clear opening width of at least 850mm through single leaf doors, and a 300mm nib on the leading of doors and a 200mm nib on the following edge of doors. All proposed thresholds are accessible.

Details of lighting, opening force, floor surface and door entry controls will be developed at the next design stage, and are expected to meet the provisions of paragraph 3.14 of AD M Vol.1.

5.2 Horizontal Circulation

The residential accommodation is organised around a central internal corridor that provide access to all dwellings from the lift and stair core that is located centrally within each block.

All internal routes are designed in accordance to provisions of paragraph 3.9 of AD M Vol.1, including corridors 1500mm wide that allow sufficient space for wheelchair users to easily manoeuvre, and to pass in opposite directions, and landings of 1500x1500mm in front of all M4(3) dwellings.

Doors across circulations routes have been avoided where possible. Where provided, communal doors

have a clear opening width of 850 mm through a single leaf door, or one leaf of a double leaf door; and a 300 mm clear space to the leading edge on the pull side of the doors and 200 mm clear space in the push side.

Details of lighting, opening force and floor surface will be developed at the next design stage, and are expected to meet the provisions of paragraph 3.9 of AD M Vol.1.

5.3 Vertical circulation

Each building has a central core comprised of two passenger lifts and an escape stair that serve all levels.

All lifts are designed in accordance to provisions of paragraph 3.16 of AD M Vol.1. All car lifts will be minimum 1100 mm x 1400 mm, lift doorways will provide a minimum clear opening width of 800 mm and there is a clear landing of at least 1500 x 1500 mm in front of all lift entrances.

Details of landing and car controls, and ensuring compliance with the requirements of BS EN 81-70:2003 will be developed at the next design stage

and are expected to meet with the provisions of paragraph 3.16 of AD M Vol.1.

All stairs are designed in accordance to provisions of paragraph 3.17 of AD M Vol.1 and the requirements of Part K for 'general access stair', including dimensions that suit ambulant disabled people, tonal contrast to aid people with impaired sight, and handrails extended 300 mm beyond the top and bottom riser.

5.4 Refuse stores

A dedicated bin store is provided at the ground floor of each building, accessed from the street with no internal route connection to the lift core due to Building Control and Fire Strategy requirements.

The routes from the dwellings to the bin stores are step-free and accessible to all residents including wheelchair users. The horizontal distance between any dwelling and its waste collection point is less than thirty metres to ensure compliance with Part H of the Building Regulations.

5.5 Emergency escape

Normal provisions for residential buildings will apply to the development whereby only the residents of an affected unit will evacuate. Other units and their residents are protected as the dwellings themselves function as safe refuges.

In line with the new London Plan 2021 Policy D5 (B5), an evacuation lift is provided on each building to allow all building users to be able to make a dignified escape.

Building F



Fig.5 Building F - Proposed Ground floor - Access overlay



Fig.6 Building F - Proposed Typical floor - Access overlay

accessible entrance

residential unit entrance

cycle entrance

external wheelchair accessible route

internal wheelchair accessible route

passenger lift

escape stairs

external bicycle parking

internal cycle storage

waste storage

20

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Building G

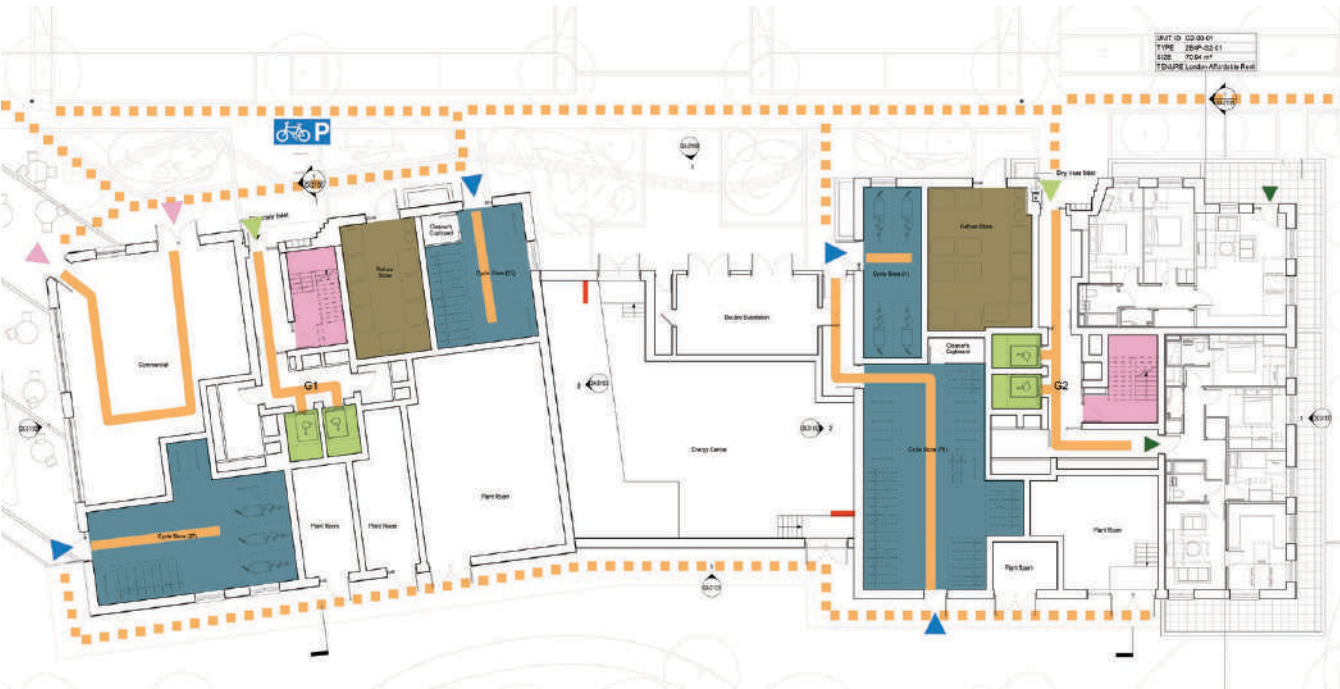


Fig.7 Building G - Proposed Ground floor - Access overlay



Fig.8 Building G - Proposed Typical floor - Access overlay

Key:

- | | | | |
|---------------------------|--------------------------------------|----------------|--------------------------|
| accessible entrance | external wheelchair accessible route | passenger lift | external bicycle parking |
| residential unit entrance | internal wheelchair accessible route | escape stairs | internal cycle storage |
| cycle entrance | | waste storage | |

Building H

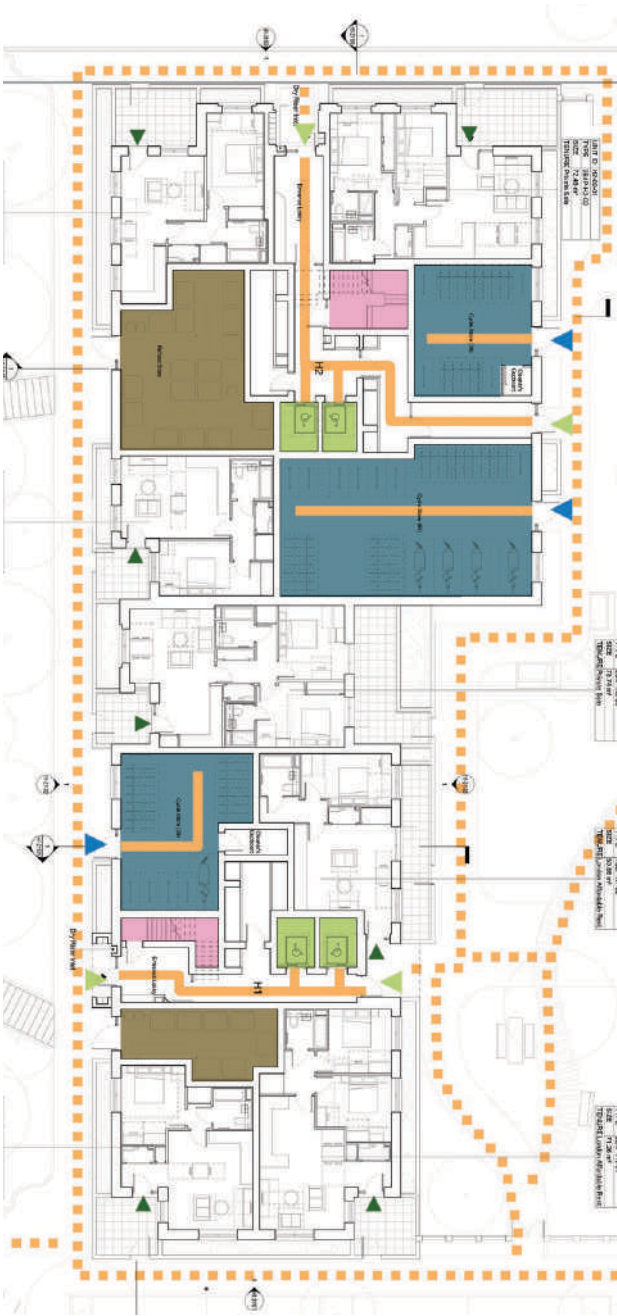


Fig.9 Building H - Proposed Ground floor - Access overlay

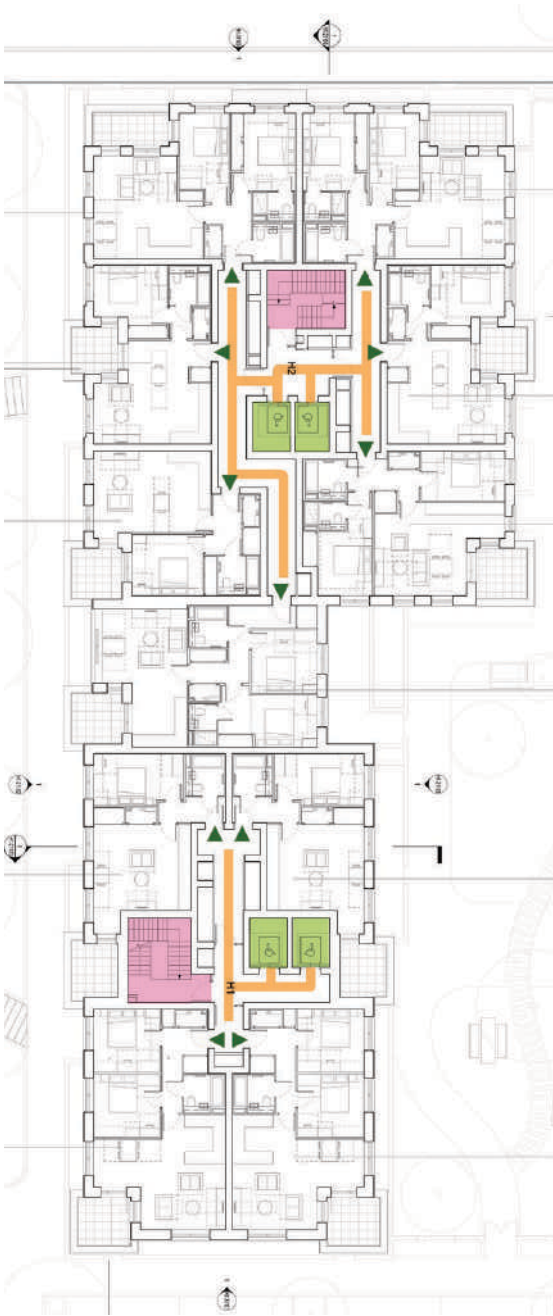


Fig.10 Building H - Proposed Typical floor - Access overlay

Key:

- | | | | |
|---------------------------|--------------------------------------|----------------|--------------------------|
| accessible entrance | external wheelchair accessible route | passenger lift | external bicycle parking |
| residential unit entrance | internal wheelchair accessible route | escape stairs | internal cycle storage |
| cycle entrance | | waste storage | |

Building J

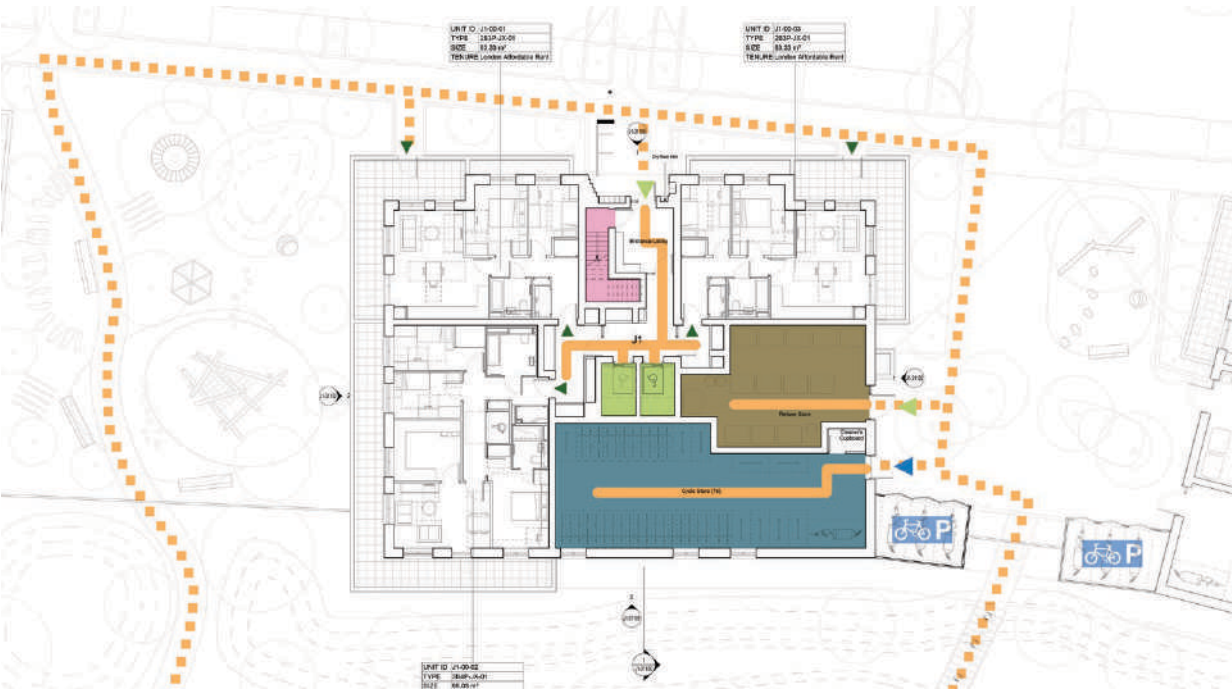


Fig.11 Building J1/2/3 - Proposed Ground floor - Access overlay

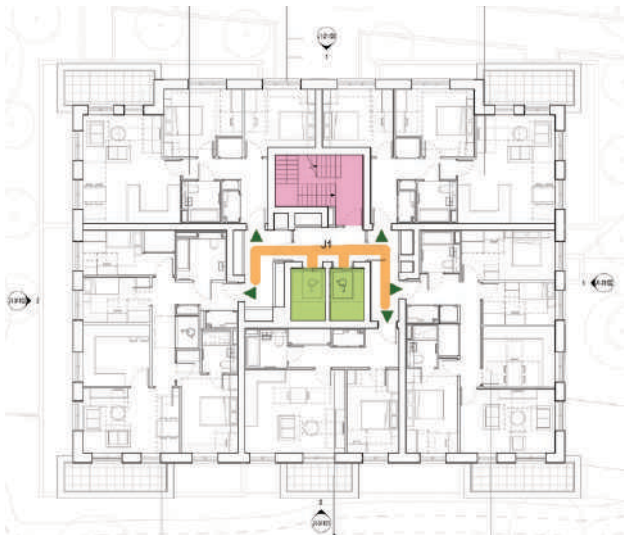


Fig.12 Building J1/2/3 - Proposed Typical floor - Access overlay

Key:

- | | | | |
|---------------------------|--------------------------------------|----------------|--------------------------|
| accessible entrance | external wheelchair accessible route | passenger lift | external bicycle parking |
| residential unit entrance | internal wheelchair accessible route | escape stairs | internal cycle storage |
| cycle entrance | | waste storage | |

6. Accessible housing

6.1 Accessible housing

Phases 1b & 2 will provide 464 dwellings across Plots E - J. As required by the Planning Condition 66 and in line with the London Plan 2021 and with the Haringey Local Plan Policy SP2 (Housing), ninety per cent of the dwellings (417no.) have been designed to meet Building Regulation requirement M4(2) ‘accessible and adaptable dwellings’; and ten per cent of the dwellings (47no.) have been designed to meet Building Regulation requirement M4(3) ‘wheelchair user dwellings’.

Wheelchair user homes have been distributed across dwelling size, tenures and phases throughout the plots as shown on Figure 13, to ensure that:

- Wheelchair user units are not clustered together; and
- Wheelchair users have as much choice about the location and level of their home as anybody else, as far as possible.

The provision made to meet Building Regulation requirement M4(3) can be of two types:

- **Wheelchair adaptable dwellings:** the access provisions allow a simple adaptation of the dwelling to meet the requirements of occupants who use wheelchairs.
- **Wheelchair accessible dwellings:** the access provisions meet the requirements of occupants who use wheelchairs.

Wheelchair adaptable dwellings are intended to be capable of becoming wheelchair accessible through easy adaptations that do not require structural or service modifications, or moving walls. They have greater flexibility in their internal layout, such as bathroom or kitchen layouts.

Wheelchair accessible dwellings are intended to be readily usable by wheelchair users at the point of completion.

Wheelchair user dwellings will normally be designed as wheelchair accessible only where the local authority is responsible for allocating or nominating a person to live in that dwelling.

The proposed distribution is as follows:

Beds	M4(2)	M4(3)	Totals
1B2P	136	6	142
2B3P	25	34	59
2B4P	168	-	168
3B4P	-	7	7
3B5P	74	-	74
4B6P	14	-	14
Totals	417	47	464



M4(3) Wheelchair Units Summary by Tenure							
Tenure	Accessibility	152P	263P	284P	384P	385P	486P
Community Land Trust	M4(3)	0	6	0	0	0	0
London Affordable Rent	M4(3)	0	11	0	3	0	0
London Living Rent	M4(3)	0	0	0	4	0	0
Private Sale	M4(3)	0	12	0	0	0	0
Shared Ownership	M4(3)	0	5	0	0	0	0
Grand total: 47		0	34	0	7	0	0

■ M4(2)
■ M4(3)

Fig.13 Proposed M4(3) Wheelchair user dwellings distribution

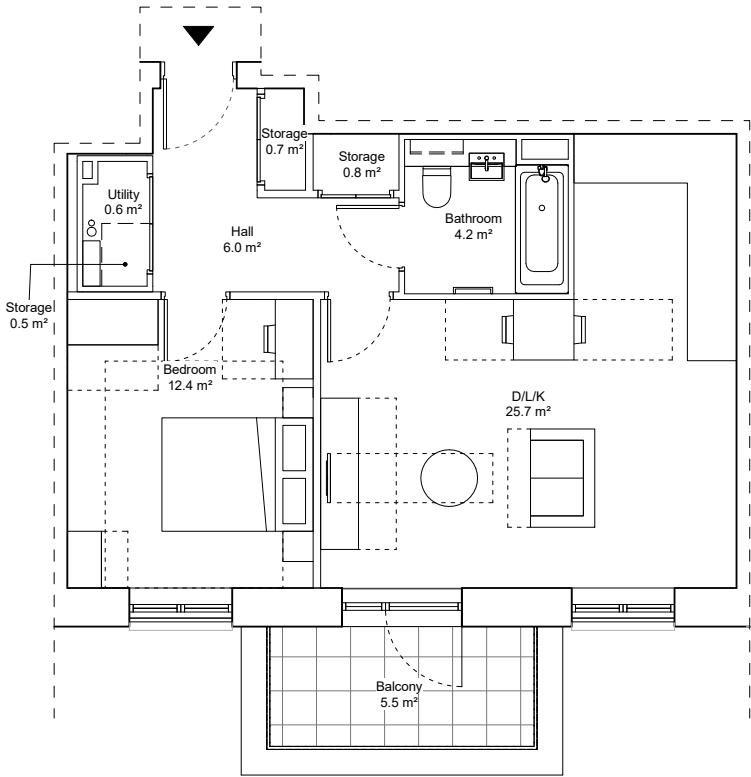
6.2 Internal provisions - Category M4(2)

The following features are the minimum access provisions required by AD-M Vol.1, category 2 units, which have been reviewed against the proposed design. Further details will be detailed at the appropriate stage of design development.

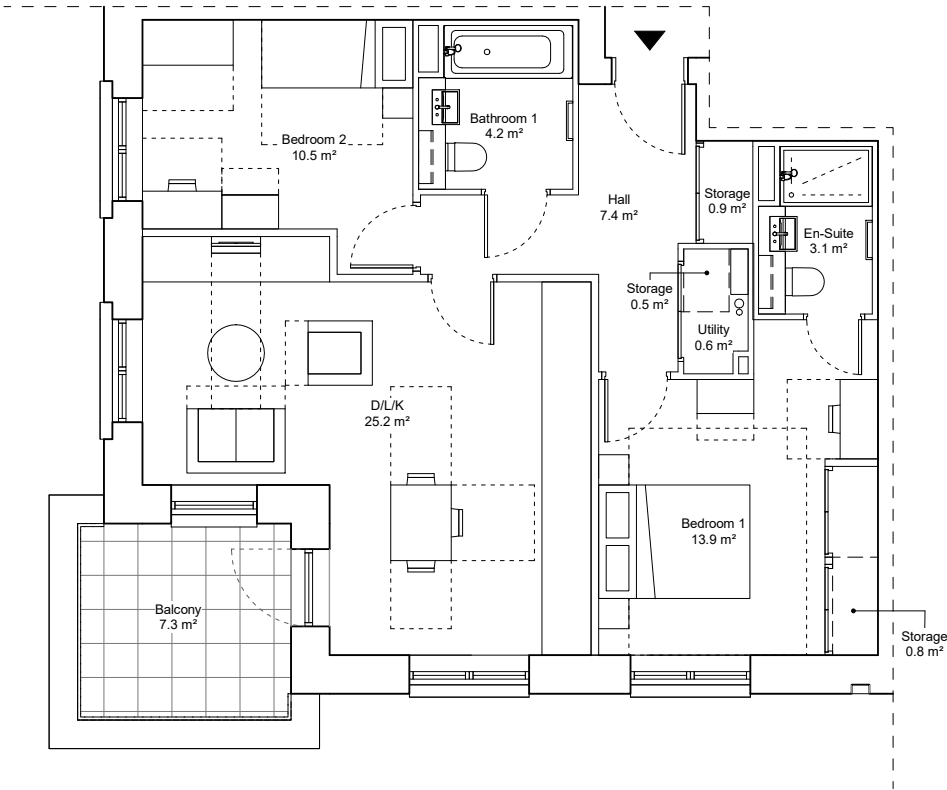
1. **Private entrance** - Entrance doors have a minimum clear opening width of 850mm, and 300 mm nib on the leading edge maintained 1200 mm beyond the door.
2. **Doors to balconies** - have a minimum clear opening width of 850mm, and 300 mm nib on the leading edge maintained 1200 mm beyond the door.
3. **Internal circulation** - Corridors are minimum 900mm wide. Internal doors have a clear opening width of 750/775/800mm depending on their approach, with a 300mm nib on the leading edge.
4. **Kitchens** - have a 1200mm clear space in front of all kitchen units.

5. **Bedrooms** - Main double bedroom have a clear access zone of 750mm on both sides and the foot of the bed. Other double bedrooms have a clear access zone of 750mm on one side and the foot of the bed. Single bedrooms have a clear access zone of 750mm on one side of the bed. All bedrooms have a clear access route of 750mm from the doorway to the window.
6. **Accessible and adaptable bathroom** - with an opening outward door.

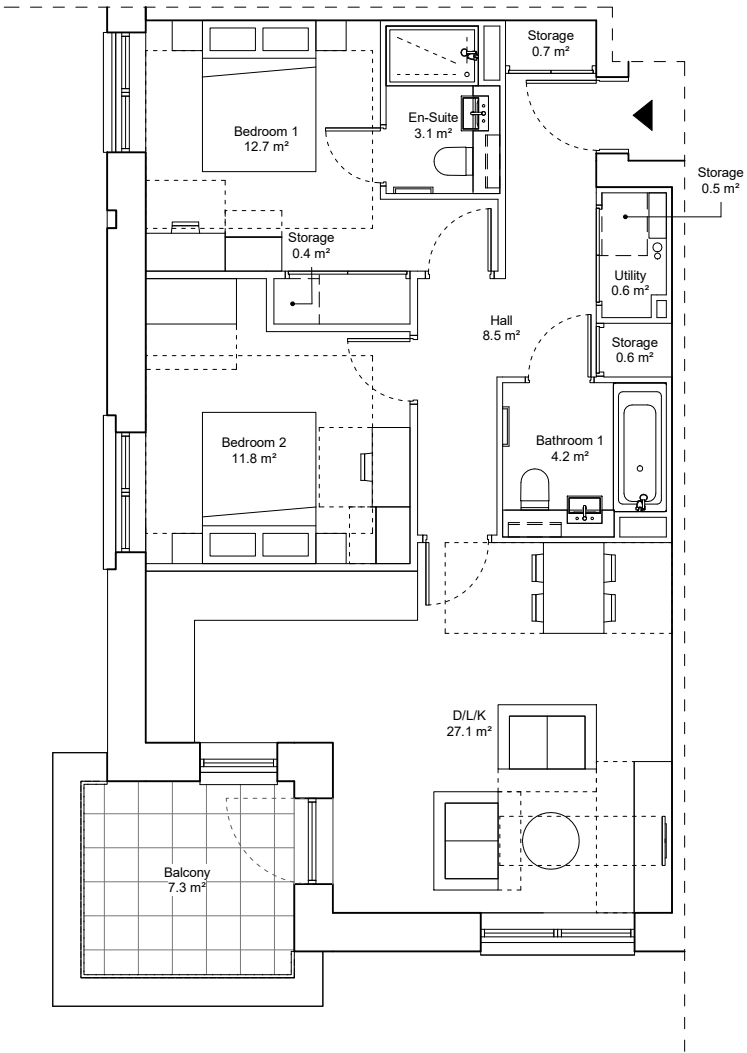
Typical residential layouts | M4(2) ‘accessible and adaptable dwellings’



Typical 1B 2P

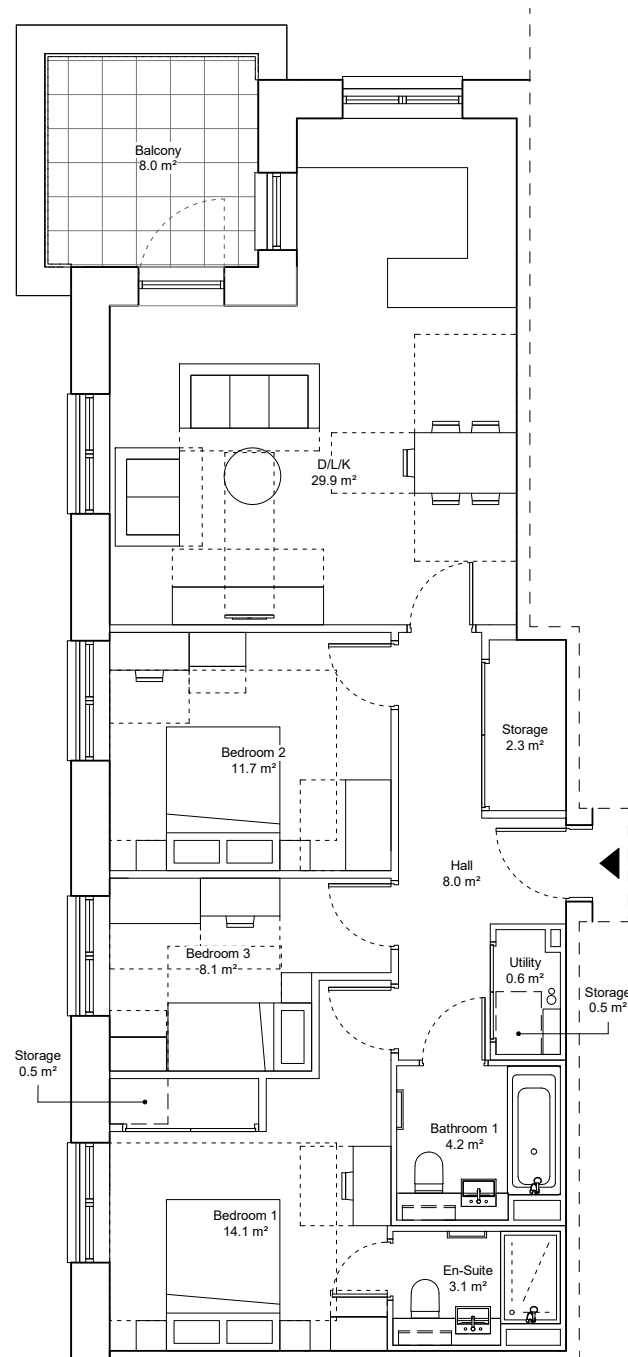


Typical 2B 3P

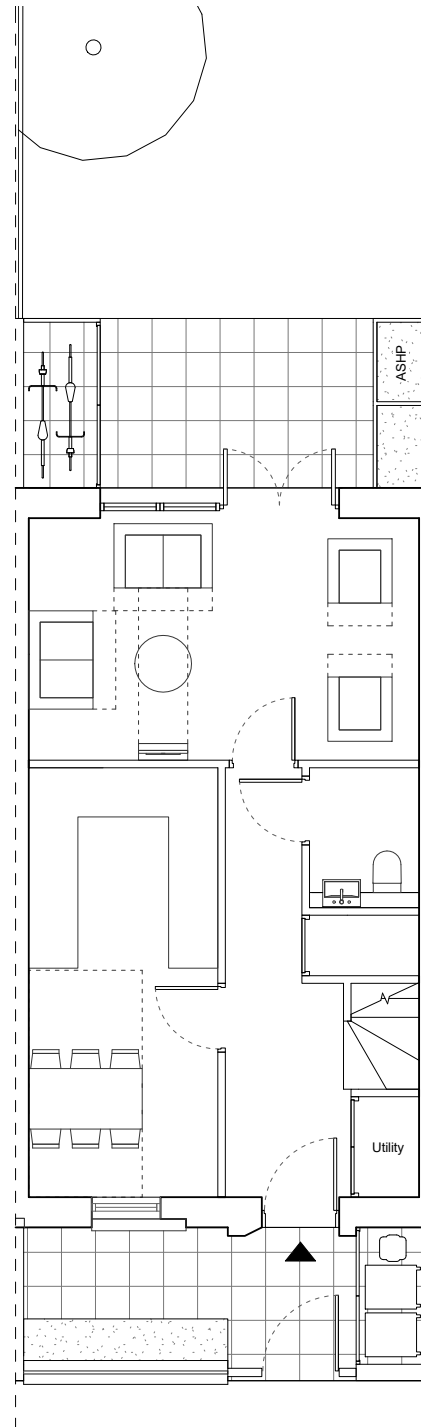


Typical 2B 4P

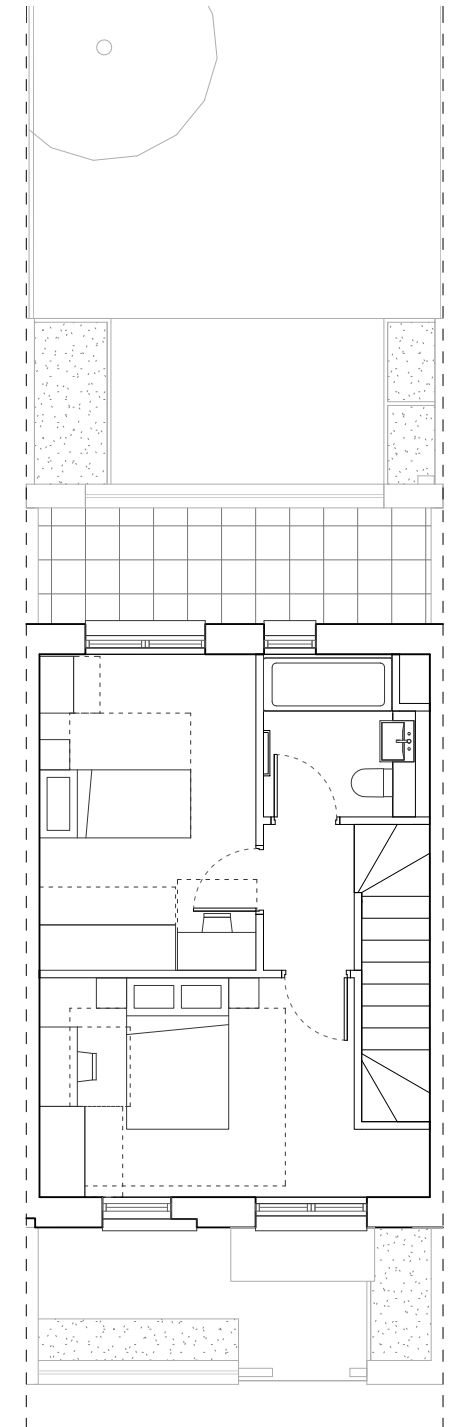
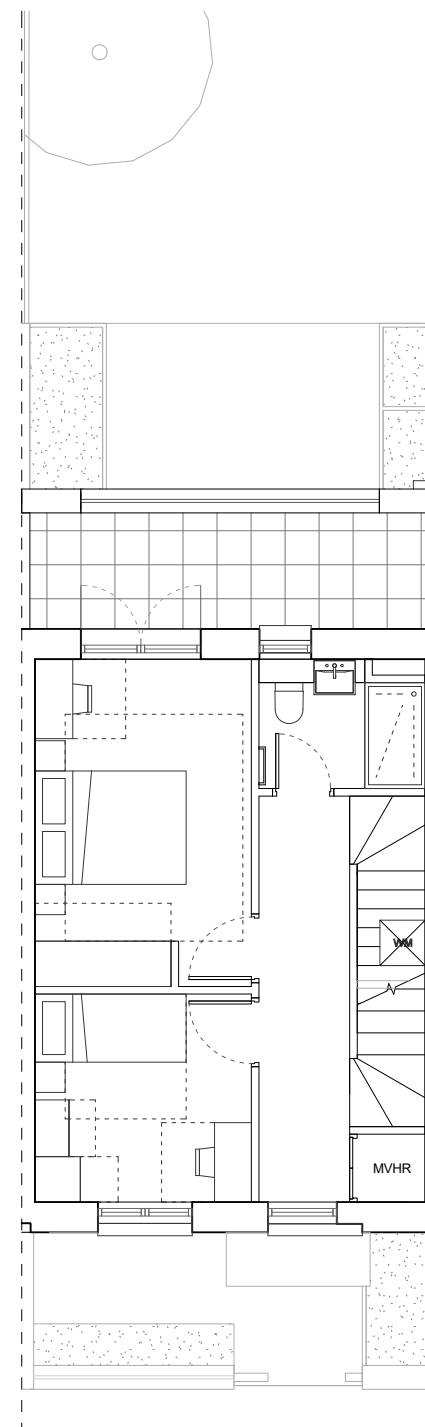
Typical residential layouts | M4(2) 'accessible and adaptable dwellings'



Typical 3B 5P



Typical 4B 6P



6.3 Internal provisions - Category M4(3)

The following features are the minimum access provisions required by AD-M Vol.1, category 3 units, which have been reviewed against the proposed design. Further details will be detailed at the appropriate stage of design development.

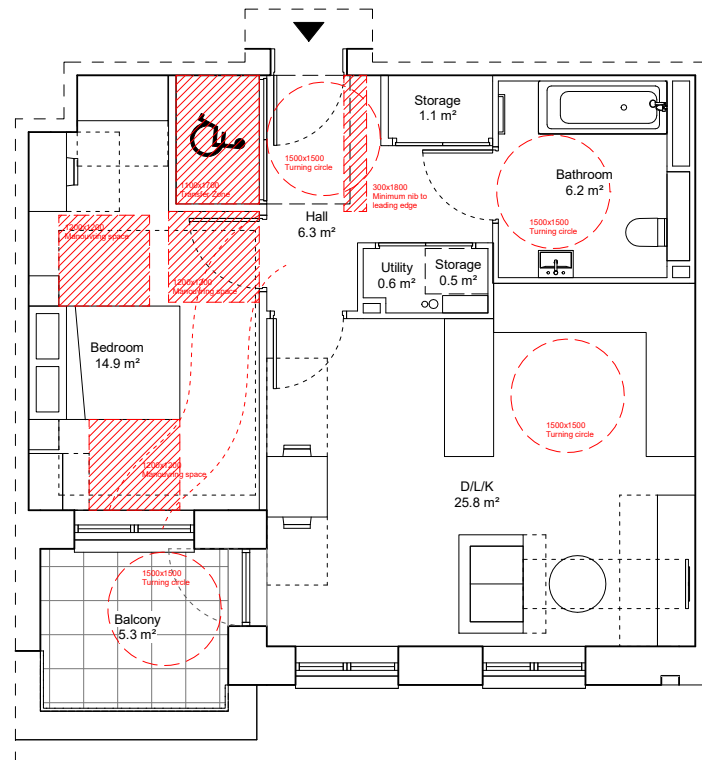
- 1. **Private entrance** - Entrance doors have a minimum clear opening width of 850mm, and 300 mm nib on the leading edge maintained 1800 mm beyond the door. Entrance area has a 1500mm turning circle.
- 2. **Doors to balconies** - have a minimum clear opening width of 850mm, and 300 mm nib on the leading edge maintained 1800 mm beyond the door.
- 3. **Internal circulation** - Corridors are minimum 1050mm wide, and 1200mm where the approach to a doorway is not head-on. Internal doors have a clear opening width of 850mm, with a 300mm nib on the leading edge and a 200mm nib on the following edge.
- 4. **Wheelchair storage and transfer space** - of 1100mm deep by 1700mm wide, accessed from a space 1200mm wide.

- 5. **General storage** - is in accordance to Table 3.1 of AD-M, Vol.1.
- 6. **Living/Eating/Kitchen area** - Minimum combined floor area for living, dining and kitchen space is in accordance to Table 3.2 of AD-M, Vol.1.
- 7. **Kitchens** - have a 1500mm clear space in front of all kitchen units. The kitchen worktop length, including fittings and appliances, is in accordance to Table 3.3 of AD-M, Vol.1. The layout demonstrates how the kitchen worktop can be enlarged by 1800mm to meet Table 3.4 of AD-M, Vol.1 without moving structural walls, stacks or drainage, and without compromising the space in any other part of the dwelling.
- 8. **Main double bedroom** - have a clear access zone of 1000mm on both sides and the foot of the bed, a clear access route of 750mm from the doorway to the window, and a clear access zone of 1000mm in front of all furniture. There is a 1200x1200mm manoeuvring space inside the doorway and on both sides of the bed. Minimum floor area is 13.5m2 and have a width of at least 3m.
- 9. **Other double bedroom** - have a clear access zone of 1000mm on one side and the foot of

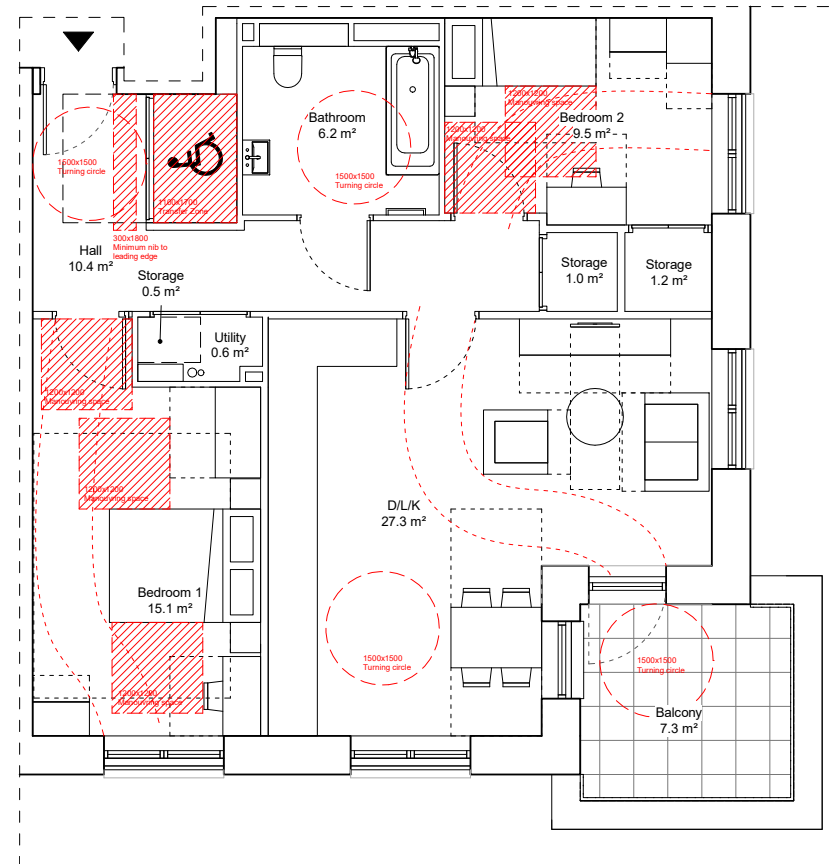
the bed, a clear access route of 750mm from the doorway to the window, and a clear access zone of 1000mm in front of all furniture. There is a 1200x1200mm manoeuvring space inside the doorway. Minimum floor area is 12.5m2 and have a width of at least 3m.

- 10. **Single bedrooms** - have a clear access zone of 1000mm on one side of the bed, a clear access route of 750mm from the doorway to the window, and a clear access zone of 1000mm in front of all furniture. There is a 1200x1200mm manoeuvring space inside the doorway. Minimum floor area is 8.5m2 and have a width of at least 2.4m.
- 11. **Wheelchair adaptable bathroom** - with an opening outward door. The layout demonstrates how the bathroom can be easily adapted in future to become wheelchair accessible.
- 12. **Second WC** - with an opening outward door.
- 13. **Private outdoor spaces** - have a minimum width of 1500mm.

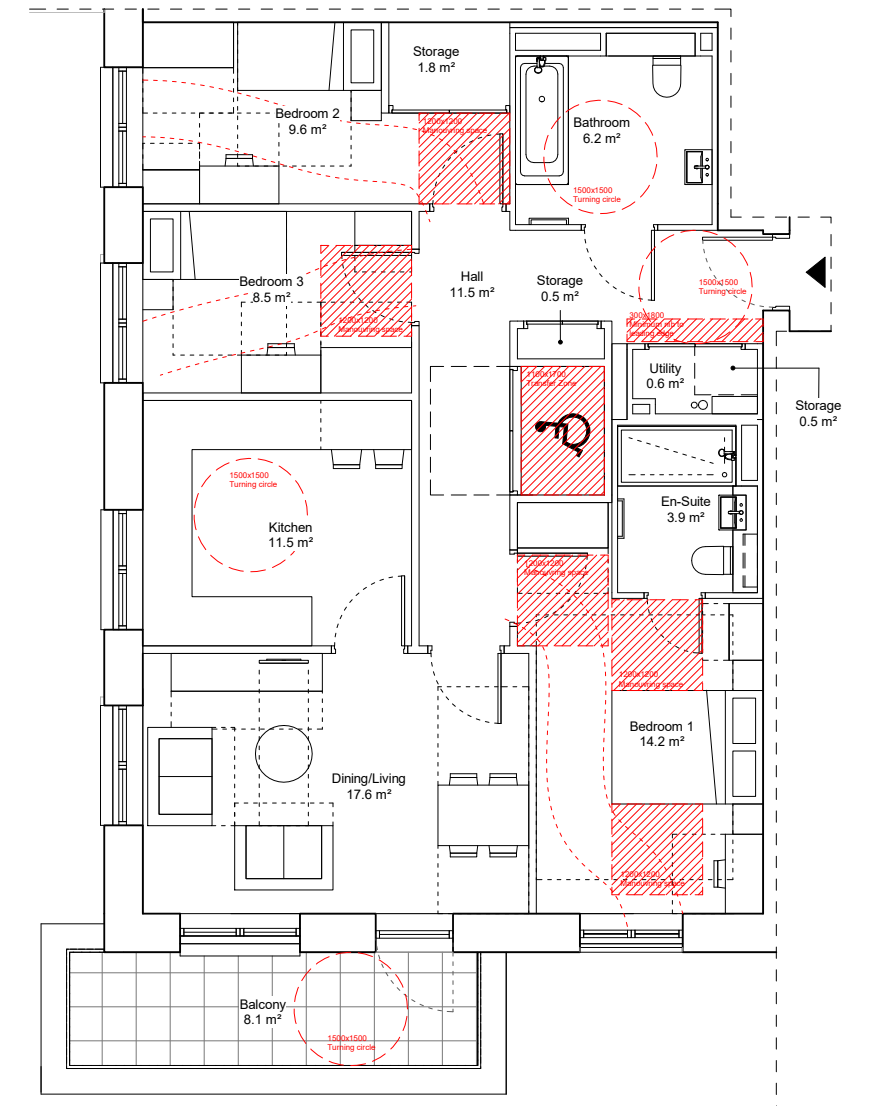
Typical residential layouts I M4(3) 'wheelchair user dwellings'



Typical 1B 2P



Typical 2B 3P



Typical 3B 4P

Appendix 1 | References for inclusive design

Legislation

Equality Act 2010

The Equality Act 2010 ('the Act') combines and supersedes previous separate discrimination legislation (including the Disability Discrimination Act 1995 as amended ('the DDA') and the disability discrimination provisions of SENDA 2001 for England, Wales and Scotland. People are protected from discrimination and harassment based on 'protected characteristics'; victimising anyone as a result of action taken in connection with the Act is also unlawful. There are nine different protected characteristics under the Act which have different levels of protection depending on the context (such as employment, provision of goods and services or the provision of education). This Access Statement focuses on the protected characteristic of disability; the definition of disability is essentially the same as under the DDA.

The types of discrimination that can arise in relation to disability are:

- Direct disability discrimination;
- Indirect disability discrimination;
- Treating disabled people unfavourably because of something arising in consequence of their disability without justification; and
- A failure to make reasonable adjustments for disabled people ('the RA duty'). The RA duty works in different ways depending on who requests the reasonable adjustments to be made, for example an employee or a member of the public.

The Act also provides protection for people who are treated less favourably because of their relationship with a disabled person (such as a carer) or for people treated less favourably because they are mistakenly believed to be disabled. A disabled person can always be treated more favourably than a non-disabled person.

If an employer is a listed public authority (such as a local authority) they will be subject to the public sector equality duty. If the employer is not a public authority but carries out a public function as part of its work, it will be covered by the general part of the equality duty in relation to the exercise of that function.

The public sector equality duty seeks to promote equality from within an organisation and the general duty requires the organisation to have due regard to the need to:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by the Act;
- Advance equality of opportunity between persons who share a relevant protected characteristic and those who do not; and
- Foster good relations between persons who share a protected characteristic and those who do not.

Due regard must be given to these three aims when undertaking procurement and to comply with procurement law, consideration must be given to the extent to which equality considerations are relevant and proportionate to the subject matter of the contract.

Most of the listed public authorities are also subject to the specific duty (which operates slightly differently in England and Wales). This involves reporting requirements to demonstrate compliance with the three aims of the general duty. The public sector equality duties are relevant both to the design and the management of the built environment.

The Reasonable Adjustment Duty and specific building provisions

The Equality Act does not contain any specific requirements for the built environment and therefore has no relevance to 'compliance' in respect of physical building standards.

Statutory Consents

When considering a reasonable adjustment to a physical feature, the Act does not override the need to obtain consents such as planning permission, building regulations approval, listed building consent, scheduled monument consent and fire regulations. If the consent is not given, there is still a duty to consider a reasonable means of avoiding the feature.

Regulations and Standards

Building Regulations 2010

- *The Building Regulations 2010, Approved Document M (Access to and use of buildings) Volume 1: Dwellings*, HM Government, 2015 edition incorporating 2016 amendments. (Referred to as AD M Vol.1).
- *The Building Regulations 2010, Approved Document M (Access to and use of buildings) Volume 2: Building other than dwellings*, HM Government, 2015 edition. Note: Amendments to AD M Volume 2 published in July 2020 take effect on 1 January, 2021. (Referred to as AD M Vol.2).
- *The Building Regulations 2010, Approved Document K (Protection from falling, collision and impact)*, HM Government, 2013 edition. (Referred to as AD K).
- *The Building Regulations 2010, Approved Document B (Fire safety) Volume 1: Dwellings*, HM Government, 2019 edition incorporating 2020 amendments.. (Referred to as AD B Vol.1).
- *The Building Regulations 2010, Approved Document B (Fire safety) Volume 2: Buildings other than dwellings*, HM Government, 2019 edition incorporating 2020 amendments. (Referred to as AD B Vol.2).

The Regulations make clear that designs other than those shown in the document can be approved if they are justified as being equally or more effective. Approval confers acceptance that the building meets the regulations in respect of physical access for disabled people.

National Planning Policy

- *National Planning Policy Framework (NPPF)*, Ministry of Housing, Communities and Local Government, 2021.

The NPPF states that all developments should be designed to be inclusive and that this should be addressed by local policies.

- *Town and Country Planning* (Development Management Procedure) (England) Order 2015, Article 9.

London Planning Policy

- *The London Plan: Spatial Development Strategy for Greater London*, Mayor of London, March 2021.

The London Plan (2021) is part of the statutory development plan for London, meaning that the policies in the Plan should inform decisions on planning applications across the capital. Relevant policies relating to access and design standards are summarised in the SPG guidance below.

- *Housing Supplementary Planning Guidance*, London Plan 2016 Implementation Framework, March 2016.
- *Social Infrastructure Supplementary Planning Guidance* May 2015, London Plan 2015 Implementation Framework, GLA, 2015.
- *Shaping Neighbourhoods Accessible London: Achieving an Inclusive Environment Supplementary Planning Guidance*, London Plan 2011 Implementation Framework Mayor of London, October 2014.

This London Plan SPG outlines an approach for delivering and implementing inclusive access. It includes principles, policies and processes for achieving inclusive design in London.

Local Planning Policy

- *Legacy Corporation Local Plan 2015-2031, London Legacy Development Corporation (LLDC) July 2015.*

- *Inclusive Design Standards, LLDC, May 2019.*
- *Newham Local Plan 2018 : A 15 year plan looking ahead to 2033.*

References

British Standards

- *British Standard 8300:2018 Design of an accessible and inclusive built environment Part-1: External Environment, Code of Practice Part-2: Buildings, Code of Practice*, British Standards Institution, 2018.
- *BS 9999:2017 Code of practice for fire safety in the design, management and use of buildings*, British Standards Institution, 2017.
- *BS EN 81-28:2018, Safety rules for the construction and installation of lifts. Remote alarm on passenger and goods passenger lifts*, British Standards Institution, 2018.
- *BS EN 81-41:2010, Safety rules for the construction and installation of lifts. Special lifts for the transport of persons and goods. Vertical lifting platforms intended for use by persons with impaired mobility*, British Standards Institution, 2010.
- *BS EN 81-70:2018, Safety rules for the construction and installation of lifts. Particular applications for passenger and goods passenger lifts. Accessibility to lifts for persons including persons with disability*, British Standards Institution, 2018.
- *BS 5656-2:2004 Safety rules for the construction and installation of escalators and moving walks - covering disabled access*, British Standards Institution, 2004.

- *DD CEN/TS 15209:2008 Tactile paving surface indicators produced from concrete, clay and stone*, British Standards Institution, 2008.
- BS 5395-1:2010 Stairs. Code of practice for the design of stairs with straight flights and winders, British Standards Institution, 2010.
- *BS 7000-6:2005 Design Management Systems. Managing inclusive design. Guide*, British Standards Institution, 2005.
- *BS 5499-4:2013 Safety signs. Code of practice for escape route signing*, British Standards Institution, 2013.
- *BS 8501:2002 Graphical symbols and signs. Public information symbols*, British Standards Institute, 2002.
- *BS 8579:2020, Guide to the design of balconies and terraces*, British Standards Institution, 2020.

International Standards

- *ISO 7176-28:2012, Wheelchairs - Part 28: Requirements and test methods for stairclimbing devices*, British Standards Institution, 2012.
- *ISO 9386-1:2000, Power-operated lifting platforms for persons with impaired mobility*, British Standards Institution, 2000.

Access Statements

- *Guidance on Information Requirements and Validation*, Department for Communities and Local Government, 2010.
- *Design and Access Statements: How to Write, Read and Use Them*, Design Council (CABE), 2006.

Sanitary Accommodation

- *Good Loo Design Guide*, CAE, RIBA Enterprises, 2004.

- *Changing Places: the practical guide*, (CPT Funding 2021 England only – Local Authorities reference), Changing Places Consortium, 2021.

- *BS 6465-2: 2017 Sanitary installations Part 2: Space recommendations - Code of practice*, British Standards Institution, 2017.

Urban Design / External Environment / Landscape / Transport

- *Inclusive Urban Design: A guide to creating accessible public spaces*, David Bonnett Associates, BSI, 2013.
- *Inclusive Mobility: A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure*, Department for Transport, 2021.
- *Improving Walkability: Good Practice Guidance on Improving Pedestrian Conditions as Part of Development Opportunities*, Transport for London, 2005.
- *Guidance on the Use of Tactile Paving Surfaces*, Department for Transport 2021.
- *Traffic Advisory Leaflet 5/95 Parking for Disabled People*, Department for Transport, 1995.
- *Inclusive Design for Getting Outdoors I'DGO*, Legacy website <http://www.idgo.ac.uk/>, 2011.
- *London Cycling Design Standards*, TfL, 2016.
- *A Guide to Inclusive Cycling (fourth edition)*, Wheels for Wellbeing, 2020.
- *Cycle Infrastructure Design: Local Transport Note 1/20*, Department for Transport, 2020.

Signage, Lighting And Wayfinding

- *The Colour, Light and Contrast Manual: Designing and Managing Inclusive Built Environments*, Bright, K., Cook, G., Wiley-Blackwell, 2010.

- *Sign Design Guide: a guide to inclusive signage*, JMU and the Sign Design Guide, 2000.

Buildings

- *Designing for Accessibility*, CAE/RIBA Publishing, 2012.
- *Inclusive Design Toolkit*, Design Council, 2014.
- *Building Sight: a Handbook of Building and Interior Design Solutions to Include the Needs of Visually Impaired People*, Barker, Barrick and Wilson, RNIB/HMSO, 1995.

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