



# EUSTON TOWER

Access Statement

December 2023



1.0

# ACCESS STATEMENT



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## 1. Introduction

### 1.1 The scheme

Redevelopment of Euston Tower, including the partial retention (retention of existing core, foundations and basement), disassembly, reuse and extension of the existing building, to provide a 32-storey building for use as offices and research and development floorspace (Class E(g)) and office, retail, café and restaurant space (Class E) and learning and community space (Class F) at ground, first and second floors, and associated external terraces. Provision of public realm enhancements, including new landscaping, and provision of new publicly accessible steps and ramp. Provision of short and long stay cycle storage, servicing, refuse storage, plant and other ancillary and associated works

### 1.2 Purpose of the report

David Bonnett Associates (DBA) was appointed by British Land Property Management LTD (British Land) as Access Consultant to the Euston Tower design team in August 2022.

This Access Statement has been prepared to support the planning application for the proposed redevelopment of Euston Tower in the London Borough of Camden and is based on a review of the proposals prepared by 3XN & Adamson Associates.

### 1.3 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;
- Sanitary provision; and
- The emergency evacuation strategy.

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.

The Access Statement describes how the scheme will be progressed with consideration of the principles of inclusive design.

The report considers the requirements of all users, visitors, staff and 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: a person who has "a physical or mental impairment that has a 'substantial' and 'long-term' negative effect on their ability to do normal daily activities".

#### 1.4 The standards and policy

The access provisions are reviewed against the access regulations and standards that apply, which are identified below.

##### National Regulations

- The Building Regulations 2010, Approved Document M (Access to and use of buildings) Volume 2: Building other than dwellings, HM Government, 2015 edition incorporating 2020 amendments. (Also referred to as AD M Vol.2).
- The Building Regulations 2010, Approved Document K (Protection from falling, collision and impact), HM Government, 2013 edition. (Also referred to as AD K).
- The Building Regulations 2010, Approved Document B (Fire safety) Volume 2: Buildings other than dwellings, HM Government, 2019 edition incorporating 2020 and 2022 amendments. (Also referred to as AD B Vol.2).

#### Best Practice

- 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. (Hereafter referred to as BS8300-1:2018 or BS8300-2:2018).

- British Standard 9999:2017 Code of Practice for Fire Safety in the Design, Management and use of Buildings, British Standards Institution, 2017.

#### National Planning Policy

- National Planning Policy Framework (NPPF), Department for Levelling Up, Housing and Communities, 2023.

#### 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.

- 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..

#### Local Policy

- Camden Local Plan, July 2017

A full list of references and a description of relevant legislation, regulations, standards and guidance are detailed in Appendix 1.

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.

#### 1.5 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. Refer to Appendix 1 for more details.

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.

#### 1.6 The Equality Act

##### Statutory consents

When considering a reasonable adjustment to a physical feature, the Equality 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.

Note that the Public Sector Equality duty requires public bodies to show evidence that they have considered how their decisions affect people with protected characteristics under the Equality Act.

Refer to Appendix 1 for further information.

##### 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.

#### 1.7 Management and maintenance

Once building works are complete, full accessibility will rely on effective facilities management.

Management items will range from provision of a good quality website, effective maintenance and staff training. Inspection of specialist devices and training of staff are intended to become a regular element of facilities management. Access Management Plans can form part of a building operator's on-going duties and may be required as part of the planning process.

## **1.8 Project constraints**

Euston Tower has constraints derived from existing levels that have required an innovative or managed approach to access.

Interpretation of the standards will be required to address these constraints and will be further explained in this Access Statement.

## **1.9 Consultation**

Please refer to the Statement of Community Involvement document. Consultation specifically on accessibility has not taken place to date.

## 2. Overview of proposals

### 2.1 Access aims

The proposed development is designed to be as inclusive as possible so that it can be comfortably and independently used by people working in and visiting the development, as well as the wider community.

The Development has been designed to meet the guidance of Approved Document M, Volume 2, and the access and inclusive design policies of the Greater London Authority as a minimum.

Designing Inclusively is defined by The Commission for Architecture and the Built Environment (CABE) as:

- 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.

Where possible the design of the proposed development has also considered and incorporated the following:

- Design guidance stated in relevant British Standards and other current good practice guidance about meeting the requirements of disabled people; and
- Contemporary requirements and expectations.

### 2.2 Summary of access provisions

The proposals for the development at this stage demonstrate that a good level of inclusive design will be achieved by the finished scheme, given the constraints of the site/existing structure.

The key access provisions for the proposed development include:

- Incorporation of the principles for inclusive design wherever possible;
- Accessible routes to all connections with local pedestrian routes and public transport;
- Safe spaces and routes for pedestrians and cyclists, segregated from vehicle traffic;
- 2x Blue Badge Bays at basement level;
- Accessible cycle parking space for staff and visitors;
- Inclusion of wheelchair-accessible sanitary facilities alongside cycling facilities, at all reception areas and at all public use areas such as cafe and public amenities;
- Step-free access to all parts of the buildings, including terraces;
- Provision of fire evacuation lifts in addition to fire-fighting lifts for safe and dignified evacuation of disabled people.







## Rail services

The entrance to the Euston Tower site is 600m (7.5 minute walk) from Euston station, served by Overground, Northern, Victoria, Avanti West Coast, Caledonian Sleeper, and West Midlands lines. Euston Station has step free access from street to platform and staff assistance is required at the platform level.

## London Underground

The entrance to Euston Tower site is 270m (3.5 minute walk) from Euston Square station, served by Circle, Hammersmith & City and Metropolitan lines. Euston Square Station has step free access from street to the trains for Westbound journeys only.

## 3.2 Drop off points

### Community transport and taxis

Some users will rely on community transport, taxis or minicabs. Informal drop-off can be carried out on Drummond Street, where taxis and private vehicles can drop passengers either at the kerbside or on a flush area. The route to the main entrances of the building is via Triton Square, where seating is provided alongside it.

## 3.3 Car parking

Two Blue Badge parking bays have been provided on the basement, accessed from Drummond Street. The proposed blue badge bays will have a shared access zone with the adjacent pedestrian access route. The layout of bays will be assessed as part of the next stage of design development.

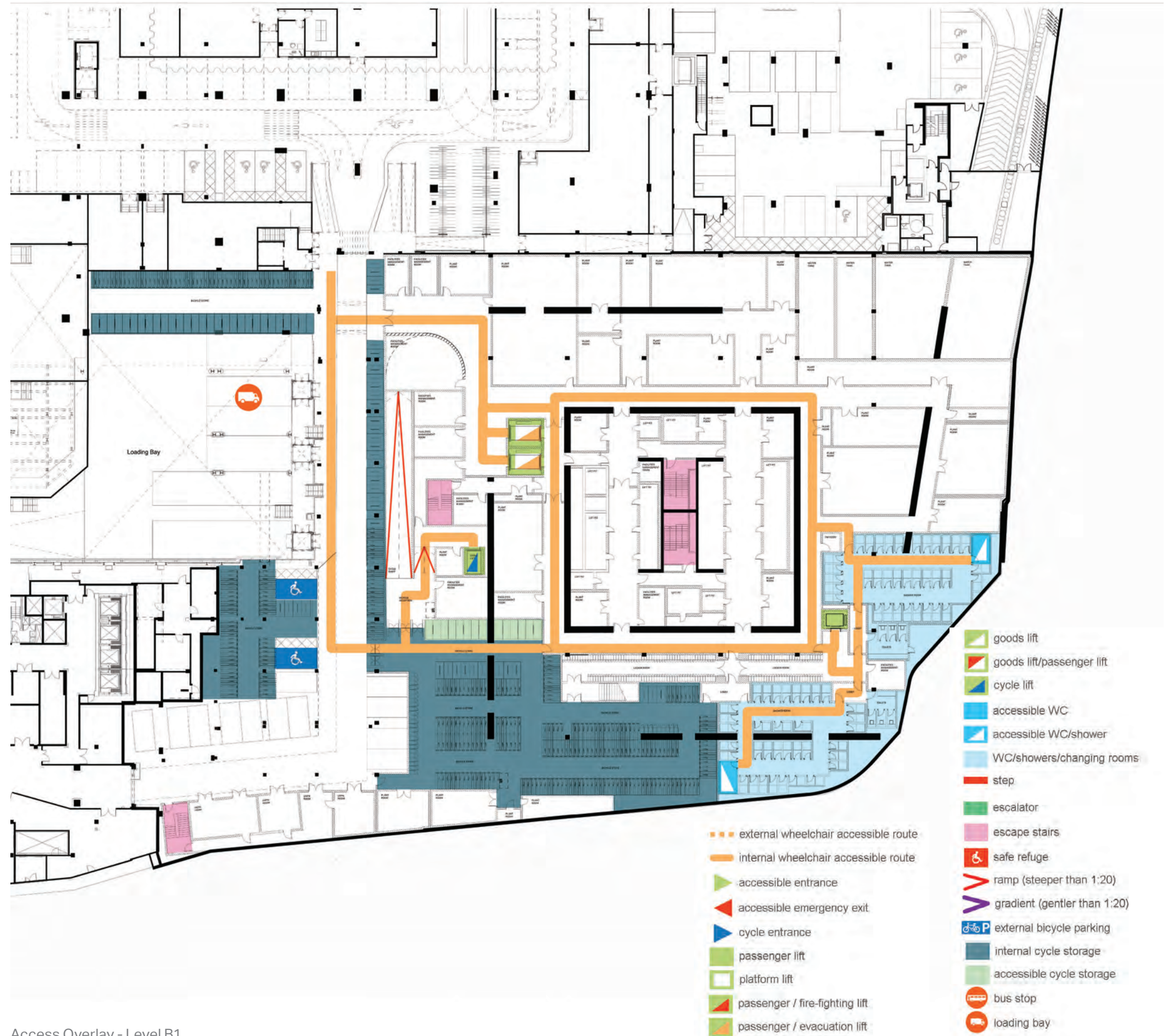
### Car parking - on street

In London Borough of Camden, Blue Badge card holders can park on any disabled bays, and on any park and display bay for unlimited time for free on single yellow lines, they can park for up to three hours displaying the clock, except for the green badge zone. In this area, a blue badge is only valid with a green badge.

Green badges are available to blue badge holders who live, work or study in Camden in the green badge zone.

For more detailed information please check: <https://www.camden.gov.uk/blue-badge>

The Blue Badge bay closest to the development is on Whitfield St just before the junction with Maple St and is 800m away from the development. Accessible on-street parking will also be used by visitors.



Access Overlay - Level B1



### 3.4 Cycles and mobility scooters

Visitor cycle parking will be provided at ground floor level in the form of Sheffield stands. A number of Sheffield stands will be provided on the basement level and other 90 will be on the public realm.

Long-stay cycle parking for office employees and staff will be provided in secure and sheltered areas at basement level 1, with a total of 200 Sheffield Stands (10% of the total) cycle parking spaces.

A cycle lift forms part of the accessible route to the basement level 1 cycle parking. The cycle lift is 1.2m x 2.3m with a lift door clear opening width of at least 1m.

Next to the cycle lift there is a two flight ramp with a gradient of 1:12 and 16m long per flight which will be further discussed with Building Control.

At least 5% of cycle parking spaces will be accessible to accommodate larger, adapted cycles or bicycles used by disabled cyclists in line with the London Cycling Design Standards as required in the London Plan.

Approach to accessible cycle parking will step-free along wide corridors and should involve passing through no more than two sets of wide automated doors. Showers, lockers and WCs, including accessible facilities, will be provided at basement level 1 near the accessible parking bays and the vertical communication core to the upper levels of the building.

Provision of mobility scooter parking bays will be considered in the next design stage.

### 3.5 Pedestrian access

#### 3.5.1 Description of site - terrain

All parts of the Euston Tower site have step-free access. All level differences have been resolved with gentle gradients shallower than 1:21.

The site is located at the north west junction of Euston Road and Hampstead Road.

#### 3.5.2 Access provisions in the public realm

All areas around Euston Tower are either pedestrianised or have ample pavements segregated from vehicle traffic. Pedestrian approaches to the entrances into Euston Tower will be made from the public pavements alongside Euston Road, Hampstead Road and the southern public realm will be shared with cycles. Routes are level and approximately 4.5m wide. The public square to the west side of the building has been enhanced to provide landscape features, greenery and seating. In addition, a stepping and sloping terraced landscaping feature faces the square providing seating opportunities. The landscape primarily connects class E activities on level 01, which are also accessible via a public lift. There is a secondary stepped external access route to level 02, also accessible via internal lift.

Provisions to ensure the comfort of all pedestrians using the public realm include:

- A legible layout for visitors, predictable spaces, facilitating wayfinding for people who are blind or partially sighted;
- Safe pedestrian zones, without traffic (except for managed gas delivery access) and with step-free, level or gently-sloping circulation routes;
- Planting and landscape features including seats and resting places every 50m as a minimum. Any street furniture, paving and landscape features such as the proposed trees and public seating placed alongside circulation routes will not create barriers or hazards for people with impaired vision;
- Suitable non-slip, even, level walking surfaces;
- Suitable tonal contrast between any structure that might protrude into the public area and the background against which it is seen;
- During detailed design, consideration will be given to ensure that the open spaces are accessible for all and that surfaces, structures and plants do not become a hazard. See BS8300-1: External Environment, Code of Practice.

#### 3.5.3 Pedestrian routes

Pedestrian access routes (PARs) are defined as the most direct and convenient pedestrian routes linking key parts of a Development. They are designed to be inclusive and have access features such as gentle gradients, suitable surfaces, rest points and good lighting. All routes meet or exceed the regulations of Approved Document Part M Volume 2 2015.

The PARs for Euston Tower are:

- Pedestrian footways alongside all the perimeter of Euston Tower;
- Routes between drop-off point/s and building entrances; and
- Routes to landscape features such as the stepping and sloping terraced landscaping.

Pedestrian access routes (PARs) are indicated in yellow on the plans included in this Access Statement.

All access routes in the site run along pedestrian areas clear of vehicular traffic.

Cycle and pedestrian routes are shared on Euston Road and through the plaza as agreed with Transport for London. Delivery vehicles will only be required for gas bottle deliveries and access will be fully managed ensuring exclusion zones are clearly marked for all pedestrians, in order to ensure a safe environment is maintained for disabled people to move around independently. Refer to Velocity's delivery service management plan for further details.



## 4. Public and commercial

### 4.1 Overview

Ground floor level contains the main office building lobby, cafe/retail and the Neighbourhood Community Hub. Level 01 is a continuation of the lobby and Neighbourhood Innovation Lab and also contains F&B facilities accessed from the external stepping and sloping terraced landscaping and from the eastern main entrance of the Neighbourhood Community Hub. Level 02 is a continuation of public event space and the main office lobby. Levels 03-30 will have the office workspaces, including shared amenities and terraces, where level 03 is an accelerator space for up-scaling life science companies.

### 4.2 Entrances to the building

There are various external entrances to the building:

#### Ground floor level

There are three entrances to the building on the ground floor: One for the Neighbourhood Innovation Lab, one to the office lobby which is split into main, western access and a secondary one on the east, and another to the cafe/retail. Every entrance to the main lobby has a double curved sliding door with a minimum clear width of 1000mm. The Community Hub is accessed via double swing doors with a minimum 1000mm clear opening width per leaf.

A dedicated cycle entrance is proposed on the south of the building, equipped with a power operated double sliding door achieving a clear opening width of a minimum 2000mm.

Weather protection will be provided over all entrances by the projecting podium level above.

The accessible entrances will have level access over the threshold and conform with the requirements of AD M Vol.2.

#### Level 01

On the west side of the building at level 01 there is an external entrance into the building leading into the lobby and Neighbourhood Community Hub. There are two sets of double swing doors with a minimum 1000mm clear opening width per leaf. Weather protection will be provided over the entrances by the projecting level above.



Access Overlay - Ground Floor



Level 01 is accessed externally via the stepping and sloping terraced landscaping and podium. The route contains a set of seven flight of slopes with landings and resting places at regular intervals. In addition two flights of stairs are available and other two stairs of one flight each have been incorporated to two different points of the ramped route. A level access route is proposed on the north-west side of the building via a public use lift.

### 4.3 Reception and lobby

#### Office

The office lobby is spread across three levels, ground floor, level 01 and level 02. There are areas with double and triple height spaces.

Details of the lobby and reception area will be developed at subsequent stages of design development. These areas will be designed to meet AD M Vol.2 including, but not limited to, the provision of fixed hearing enhancement system(s) at reception and service desks and lower sections of desk / counter that are permanently accessible to wheelchair users.

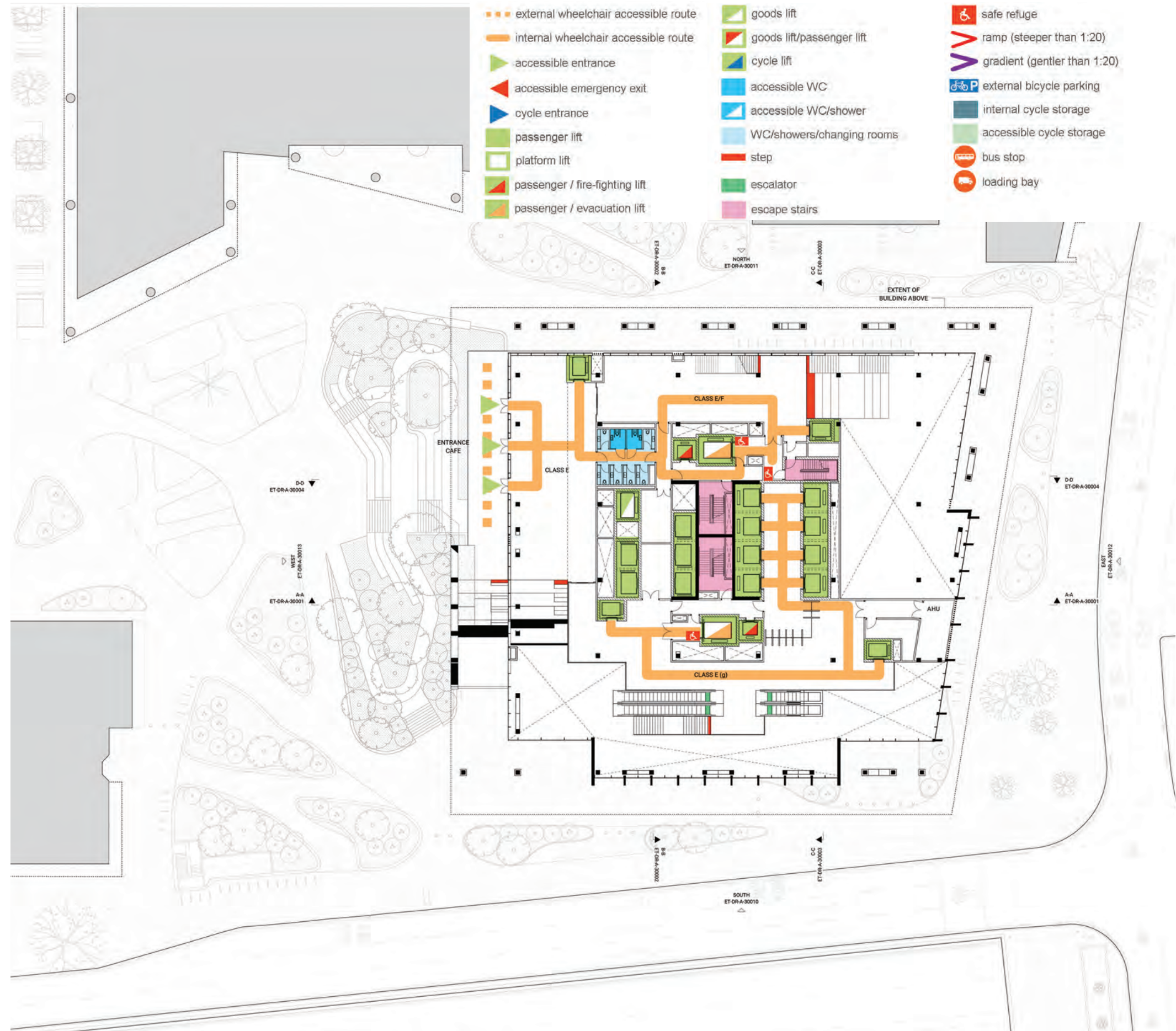
Considerations will be made to prevent the reverberation of the large volume of spaces and the reduction of noise.

Security barriers between the reception and main core feature at least one barrier in each location with a minimum clear-opening width of 1000mm. Unisex accessible toilet facilities will be within 40m from the reception points.

Escalators to level 01 are accessible from the office lobby. Alternative routes for those unable to negotiate escalators have been proposed, without involving passing through the security gates, by using one of the two lifts on the lobby. The lobby extends up to level 02.

#### Public

The public space is spread across three levels, ground floor, level 01 and level 02. Details of the lobby and reception area will be developed at subsequent stages of design development. These areas will be designed to meet AD M Vol.2 including, but not limited to, the provision of fixed hearing enhancement system(s) at reception and service desks and lower sections of desk / counter that are permanently accessible to wheelchair users.



Access Overlay - Level 1



#### 4.4 Horizontal circulation

Each level of Euston Tower has circulation routes that are step-free and reached from the ground floor lobby via lifts or stairs. Corridors within the core at levels 03-30 to access the lifts and WCs will be minimised. Internal arrangements of the office floor plants will be developed by the tenant.

Basement level has two different levels. A 1:20 slope is provided between the cycle lift and the cycle parking bays with a change of level of 200mm.

Corridors will generally be wider than 1500mm, and no less than 1200mm wide in any case. Passing places 1800mm wide x 1800mm long will be provided at junctions in corridors that are less than 1800mm wide.

Internal doors will have a minimum clear opening width of 800mm through a single leaf door, or one leaf of a double leaf door; and will have 300mm clear space to the leading edge on the pull side of the doors.

Details of horizontal circulation for the base-build will be developed further at a subsequent stage of design development; details of tenant fit-out of areas will be developed at further design development.

Consideration will be given to materials and finishes at the appropriate stage of design development. Secure access controls, where provided, will be designed to be accessible.

Office floors will have up to three tenancies, and the Lab will have up to two tenancies. All subdivisions will consider access to the sanitary cores to maintain a maximum travel distance of 40m to a wheelchair-accessible WC.

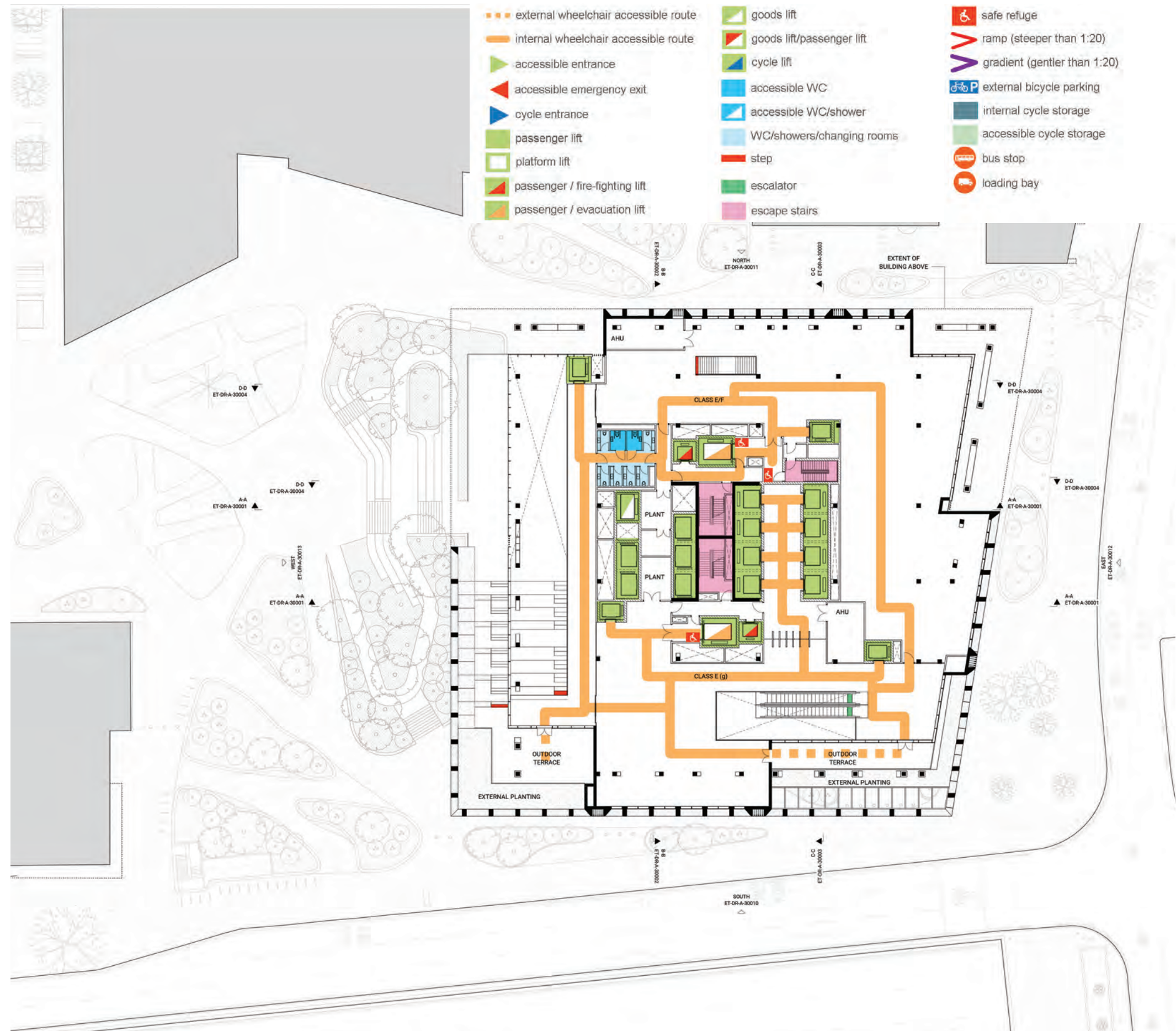
#### 4.5 Vertical circulation

##### 4.5.1 Lifts

Details of passenger lifting devices will be developed at a subsequent stage of design development, however lifts will be designed to meet the guidance of AD M Vol.2, and, for passenger lifts, BS EN 81-70. The lift strategy is described below:

Office passenger lifts

There will be a centralised core with three banks of lifts that serve separate parts of the building as the tower floor plate steps back and becomes smaller.



Access Overlay - Level 2



One bank of five single deck passenger lifts is provided in the Low-rise core to serve levels GF-11.

One bank of four double deck passenger lifts is provided in the mid-rise core to serve levels 01, 02 and 11-19.

One bank of four double deck passenger lifts is provided in the high-rise core to serve levels 01, 02, 11, 19-29.

**Public external lift**

One public external lift is provided to the north of the building serving GF to level 02. The lift will be clearly indicated and identifiable from the start of the slope of the stepping and sloping terraced landscaping, as it is an accessible alternative to it.

**Public lift**

A passenger lift is provided on the public area serving GF to level 02. This lift is an accessible alternative to the steps provided next to a set of two internal stairs, one adjacent to the stepping and sloping terraced landscaping at GF and the other on the west end of the building between level 01 and 02.

**Podium lift**

Two passenger lifts are provided on the lobby area one of which serves GF to level 03 and the other Basement to level 03.

**Lifting platforms**

A platform lift is proposed between levels 29-30 connecting the workspace areas.

Passenger lifts and lifting platforms are provided for everyday use by office tenants and visitors to the building. These lifts have internal dimensions of 1400mm x 2000mm and a clear door opening width of 1100mm, which exceed the requirements of AD M. All passenger lifts have a clear 1500 x 1500mm space directly in front of the lift doors.

**Cycle lift**

The cycle lift is accessed at ground floor and serves the cycle parking and changing facilities at basement level 1. The proposed cycle lift will be 1.3m wide by 2.6m deep and have a lift door clear opening width of 1m, exceeding the dimensions recommended by London Cycling Design Standards.





## Goods lifts

Four goods lifts are provided. Two of them serve basement to ground floor and the other two serve all floors between ground floor and level 30 for the use of building management staff. The goods lifts will be designed to meet AD M and BS EN 81-70:2018 requirements.

## Fire-fighting and evacuation lifts

There are two dedicated fire-fighting lifts serving GF to level 30.

The goods lifts double up as evacuation lifts.

## 4.5.2 Stairs

The office core contains three stairs intended primarily for escape use. Two of the stairs serve all levels between Basement 1 and level 30 and the third serves ground floor level to level 02.

In the office lobby, there is one set of stairs between Basement and level 01.

The public area has two sets of stairs, the first one between GF and level 01 and the second on the west between levels 01 and 02.

There is one set of stairs between levels 29 and 30, connecting the last floors of the building.

The external areas have been described under the public realm section (3.5).

All internal stairs will be designed to meet the requirements of Part K for 'general access stair', and will be further developed at detailed design, including dimensions that suit ambulant disabled people, tonal contrast to aid people with impaired sight, and handrails that extend 300 mm beyond the top and bottom riser. It is understood that young children will not be regular users of the office areas of the building. Should young children be anticipated to be regular users of the building, the design of stairs, guarding, etc in those areas will take this into account.



Access Overlay - Level 29



### 4.5.3 Escalators

Two sets of escalators are proposed in the office lobby at ground floor, outside of the secured office areas. One escalator leads from GF to level 01 and the second from level 01 to 02 of the office lobby.

Escalators will be designed considering the guidance of BS8300 and BS EN 115-1.

Podium lifts will be the alternative route to the escalators, which are positioned near the escalators outside of the secured office areas too.

### 4.5.4 Ramps

A cycle ramp is proposed between GF and basement 1. The gradient and the length of the flights are longer than AD K guidance, and therefore a cycle lift has been proposed as an accessible route.

A ramp of a gradient of 1:20 has been proposed between the cycle lift and the cycle parking on basement 1 to overcome a level change of 200mm.

Details of internal ramps will be developed at a subsequent stage of design development, however will be designed to meet AD K guidance including, but not limited to, the provision of tonally contrasting handrails, tonally contrasting ramp and landing surfaces.

## 4.6 Access to facilities / specific areas

### 4.6.1 Food and Beverage

F&B facilities are proposed at GF and level 01 outside the security line. The second floor can be accessed from the office lobby at ground floor either via lifts or the escalators or via the external lift, slopes or stairs.

Any bar or serving counter will have a section that is permanently accessible to wheelchair users at 850mm AFFL and higher section for people standing. Wheelchair accessible sanitary accommodation will be within 40m distance.

### 4.6.2 Community Hub

The Community Hub is proposed with a terraced feature and open plan spaces. Wheelchair accessible sanitary accommodation will be within 40m distance.





### 4.6.3 Terraces / balconies

A terrace is proposed at level 02 linked to the public external stepping and sloping terraced landscaping and another terrace is proposed at level 19.

Details of terraces will be further developed at the next stage of design development, including accessible terrace doors, thresholds, access route widths, and surfaces. The good practice guidance of BS 8300-1:2018, including provision of a variety of seating, will be considered. Terrace fit-out will need to consider circulation and manoeuvring spaces.

### 4.7 Sanitary provision

All doors to sanitary facilities will have a clear opening width in line with Table 2 of ADM Vol.2 and will be capable of being opened outward, from the outside, in an emergency.

Standard WCs will accommodate a 450mm diameter turning circle clear of the door swing, walls and sanitary fittings.

All standard separate sex washrooms should include an ambulant disabled cubicle with grabrails. Current provision is for unisex "superloos" and it will be re-visited at the next stage.

Enlarged cubicles will be provided in facilities with four or more cubicles, for the benefit of guide dogs users, people with luggage or with children who require assistance.

A choice of right / left-hand transfer should be offered where more than one accessible WCs provided to serve a facility and on consecutive floors.

Accessible WCs and other sanitary facilities will be designed in accordance to AD M Vol.2 requirements, including the provision of fittings, grabrails, tonal contrast, emergency assistance alarms, etc.

#### 4.7.1 Office WCs

Toilets are proposed in the core at all office floors between levels 03 and 30. Travel distance to an accessible WC does not exceed 40m from any part of the floor plates. Provision of ambulant disabled cubicles will be made.

#### 4.7.2 Cycling changing facilities

Changing facilities will be provided for cyclists at basement level 1, located adjacent to the cycle stores. Two combined wheelchair accessible shower and toilet cubicles are provided with right- and left-hand side transfer.

### 4.7.3 Public areas

Considerations on provision of baby changing facilities will be made at next stage of design development.

If baby changing facilities are provided they should be wheelchair accessible but not located in AWCs. A family room is desirable in large public developments to include extra AWC/Baby change and feeding area (Possible provision of baby change facilities to be discussed/confirmed at the next stage of design development or describe provision)

#### 4.7.4 Changing Places toilet

Changing Places toilets are facilities designed for individuals with complex and multiple impairments who may require the assistance of up to two assistants. AD M Vol.2 requires a Changing Places toilet to be provided in large building developments, including assembly buildings with a capacity of 350 or more people or retail premises with a gross floor area of 2500sqm or more.

Provision of Changing Places Toilet has not been included as the building does not cater for the thresholds of amount of people or activities. Nevertheless, it will be investigated at the next stage of design development.

### 4.8 Emergency egress

The fire strategy for Euston Tower will take precedence over this section. The strategy includes best practice procedures for the evacuation of disabled people from all parts of the buildings, based on BS 9999:2017 and Regulatory Reform (Fire Safety) Order Supplementary Guidance. Please refer to the Fire Statement.

The following measures for the evacuation of disabled staff and visitors will be considered:

- Designated escape routes from each part of the building that allow wheelchair users and others to reach a safe area to await assistance;
- Provision of safe refuge with a two-way communications system, within reach of a wheelchair user, to allow direct communication with the fire controlling authority in accordance with BS 9999:2017;
- Alarm systems that provide visual as well as audible signals in isolated locations such as WCs;
- Use of lifts as part of the evacuation strategy, in line with The London Plan 2021 (Policies D5 Inclusive Design and D12 Fire safety) which require lifts suitable for evacuation regardless of building height; and
- Management procedures that include the appointment and regular training of staff to assist with the evacuation of disabled people.

The use of suitable warning systems, such as vibrating pagers may be considered for individual members of staff, following a Personal Emergency Egress Plan (PEEP) assessment.



## 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 2: Building other than dwellings, HM Government, 2015 edition incorporating 2020 amendments. (Also referred to as AD M Vol.2).
- The Building Regulations 2010, Approved Document K (Protection from falling, collision and impact), HM Government, 2013 edition. (Also referred to as AD K).
- The Building Regulations 2010, Approved Document B (Fire safety) Volume 2: Buildings other than dwellings, HM Government, 2019 edition incorporating 2020 and 2022 amendments. (Also 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), Department for Levelling Up, Housing and Communities, 2023.

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.

- 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

Camden Local Plan July 2017

### 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 81-70:2021+A1:2022, 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, 2022.
- 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 8579:2020, Guide to the design of balconies and terraces, British Standards Institution, 2020.
- PAS 6463:2022 Design for the mind – Neurodiversity and the built environment – Guide, British Standards Institution, 2022.
- PAS 1899:2022 Electric vehicles – Accessible charging – Specification, British Standards Institution, 2022.

#### **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.

#### **Office And Commercial**

- Workplace health, safety and welfare. Workplace (Health, Safety and Welfare) Regulations 1992. Approved Code of Practice L24, HSE Books ,1992.
- The Accessible Office: Designing the Inclusive Workplace, JMU Access Partnership, Royal National Institute of Blind People, 2005.
- Open for business: Taking the Risk out of 2004, Employers' Forum on Disability, 2003.



