# **INCLUSIVE ACCESS STATEMENT**







# TWICKENHAM REDISCOVERED PROGRAMME – RIVERSIDE PROJECT

## **INCLUSIVE ACCESS STATEMENT**

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## 1. INTRODUCTION

#### 1.1 Context

- 1.1.1 SYSTRA Ltd ('SYSTRA') has been commissioned by the London Borough of Richmond upon Thames ('LBRuT', 'the Applicant') to prepare an access statement for the proposed redevelopment of 1A, 1B King Street and 2/4 Water Lane, the site of the remaining former swimming pool buildings at the corner of Water Lane and The Embankment and the riverfacing parcel of land on the Embankment in front of Diamond Jubilee Gardens in Twickenham, London TW1 3SD ('the Site').
- 1.1.2 The Proposed Development entails the demolition and removal of all existing buildings and structures, to provide a mixed-use development comprising:
  - Lower Ground Floor Level: a new vehicular access from the Embankment, parking for 23 cars and 68 cycles and three seasonal units (201sqm);
  - Ground Floor Level: 505sqm A3, 250sqm B1, 244sqm A1 and 62sqm flexible commercial floor space, a new public square and areas of public realm;
  - First, Second and Third Floors: 39 residential units (18 no. 1 bedroom, 19 no. 2 bedroom and 2 no. 3 bedroom, including 6 no. affordable homes); and
  - Public realm improvements, reconfiguration of on-street parking, improved pedestrian access and landscaping and an amendment of service vehicle access.
- 1.1.3 The Local Planning and Highway Authority are the London Borough of Richmond-upon-Thames ('LBRuT').

## 1.2 Inclusive Design Principles

- 1.2.1 The principles of inclusive design are underpinned by the social model of disability, which supports the view that it is the attitude of society at large, and organisational and environmental structures, that restrict an individuals' participation in mainstream activities.
- 1.2.2 The solution to this problem is, in part, to change the environment, to remove the barriers to full participation and ensure new developments are designed inclusively from the outset to ensure that developments can be used safely, easily and with dignity by all. All new developments should be convenient to use and welcoming with no disabling barriers, so everyone can use them independently, without undue effort, separation or special treatment.
- 1.2.3 The proposed development therefore aspires to be:
  - Welcoming with no disabling barriers that might exclude people;
  - Inclusive so everyone can use it safely and easily;
  - Legible to ensure ease of movement and wayfinding;
  - Convenient so everyone can use it without too much effort or separation;
  - Adaptable to respond to changing needs; and
  - Flexible so different people can use it in different ways.

## 1.3 Purpose of Access Statement

1.3.1 The purpose of the Access Statement is to explain how the principles of inclusive design, including the specific needs of older and disabled people, have been integrated into the

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development proposals, whether relevant best practice standards have been complied with, and how inclusion will be maintained and managed. The Access Statement process is key to ensuring that the built environment is safe, accessible and convenient and enables everyone to access jobs, opportunities and facilities.

## 1.4 Scoping Discussions

1.4.1 The project team has undertaken extensive discussions with LBRuT Officers, with regular design team meetings throughout the pre-planning period. A formal pre-application meeting took place with the highways and transport officers on 30<sup>th</sup> August 2017, which SYSTRA attended. The response included the following points regarding inclusive access and design and are addressed within this Access Statement:

It is recommended to identify the flats that will meet Building Regulation Requirement M4(3) wheelchair user dwellings (90% of all new build housing is also required to meet Building Regulation Requirements M4(2) 'accessible and adaptable dwellings')

Inclusive design, connectivity and permeability, natural surveillance and orientation are all considered when assessing layout and design

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## 2. POLICY AND DESIGN GUIDANCE

#### 2.1 Context

2.1.1 This Access Statement responds to inclusive design policy and guidance at a national, regional and local level, as detailed in this section.

## 2.2 Relevant Planning Policy

2.2.1 Planning Policy relevant to the proposed development includes:

#### **National Policy**

National Planning Policy Framework (NPPF) (March 2012);

#### **Regional Policy**

- The London Plan (March 2016);
- The London Plan Supplementary Planning Guidance (SPG) Shaping Neighbourhoods,
- Accessible London: Achieving an Inclusive Environment (October 2014);
- Mayors Draft Transport Strategy (2017); and
- Greater London Authority (GLA) SPG (March 2016): Housing.

#### **Local Policy**

- LBRuT Emerging Local Plan (exp 2018), Core Strategy (2009) and Development Management Plan (2011); and
- The Twickenham Area Action Plan (TAAP, 2013).
- 2.2.2 There is continuity across policy objectives which seek to provide inclusive and accessible environments for all members of society. Specific policy requirements to note in respect of the Proposed Development are listed below:

All new developments in London should achieve the highest standards of accessible and inclusive design and support the principles of inclusive design (London Plan, policy 7.2 Accessible London Implementation point 8);

Non – residential elements of a development should provide at least one accessible onor off- street car parking bay designated for Blue Badge holders, even if no general parking is provided. Any development providing off-street parking should provide at least two bays designated for Blue Badge holders (London Plan, para.6A.2);

The provision of disabled bays should be regularly monitored and reviewed to ensure the level is adequate and that enforcement is effective (London Plan, para. 6A.3);

Spaces designated for use by disabled people should be located on firm, level ground and as close as feasible to the accessible entrance to the building (London Plan, para. 6A.3);

Communal refuse and recycling containers, communal bin enclosures and refuse and recycling stores should be accessible to all residents including children and wheelchair users and located on a hard, level surface (Housing SPG, Standard 22);

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The layout and design of development and social infrastructure facilities should be guided by principles of inclusive design and should be accessible to all sections of the community, including disabled, the elderly and families with young children (Housing SPG, Policy 7.2);

The redesign of estates should maximise active frontages and minimise inactive frontages where buildings face publicly accessible space in order to increase natural surveillance and activity (Housing SPG, Standard 10);

90% of London's future housing should be built to Building Regulation requirement 'M4 (2): Accessible and adaptable dwellings' and 10 % should be built to Building Regulation requirement 'M4 (3): Wheelchair user dwellings' (London Plan, Policy 3.8);

Step free access should be provided to areas of amenity space and unnecessary changes in level should be avoided as these could form barriers for some people (SPG Accessible London para. 4.2.26);

Developers are encouraged to provide mobility storage / charging areas for residents within suitably sized communal areas, for example adjacent to cycle storage in separate lockable areas (SPG Accessible London, Implementation Point 24);

Existing public access to the borough's rivers should be retained and opportunities should be taken to improve and enhance access arrangements, including creating inclusive access, where possible (Richmond Draft Local Plan, para 5.7.8);

The Council has adopted the optional higher Building Regulations Part M for inclusive access (Richmond Draft Local Plan, para 9.2.5); and

Policy LP 35 states that: '90% of all new build housing is required to meeting Building Regulation Requirement M4 (2) 'accessible and adaptable dwellings' and 10% of all new build housing is required to meeting Building Regulation Requirement M4 (3) 'wheelchair user dwellings' (Richmond Draft Local Plan and London Plan, policy 3.8);

In non-lift serviced multi-storey development where step free access is not viable, assessments should be submitted to demonstrate that the inclusion of a lift would make the scheme unviable or mean that service charges are not affordable for intended residents. If this is satisfactorily evidenced, then the units above or below the ground floor that cannot provide step free access would only need to satisfy the requirements of M4(1) of the Building Regulations. (LBRT Draft Local Plan, 2017)

## 2.3 Relevant Design Guidance

## 2.3.1 Design guidance relevant to the Proposed Development includes:

- Approved Document Part M (AD Part M), 2015 incorporating 2016 amendments Edition, Access To and Use of Buildings- Volume 1: Dwellings;
- Approved Document Part M (AD Part M), 2015 Edition, Access To and Use of Buildings-Volume 2: Buildings Other Than Dwellings;
- O British Standard 8300(2009) + A1(2010), Code of Practice for Design of Buildings and their Approaches to meet the needs of Disabled People;
- British Standard 9999 (2017), Code of practice for fire safety in the design, management and use of buildings;
- Department for Transport (DfT) (2005), Inclusive Mobility: A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure;

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- O GLA (2007), Wheelchair Accessible Housing: Best Practice Guidance;
- O DfT (2007), Manual for Streets (MfS);
- O DfT (1995), Transport Advisory Leaflet 05/95: Parking for Disabled People;
- O DfT (2007), Guidance on the Use of Tactile Paving Surfaces;
- Guide Dogs for the Blind Association (GDBA) (2010) Inclusive Streets: Design principles for blind and partially sighted people; and
- Street Charter toolkit, Royal National Institute of Blind People (RNIB) (2015).
- 2.3.2 A review of inclusive design guidance has shown specific minimum design requirements for buildings, car parking and the streetscape. A summary of some key requirements is provided below:
  - The approved Part M (2015 incorporating 2016 amendments) provides guidance about how to comply with requirements M4(1), M4(2) and M4(3) of the Building Regulations which correlate to visitable dwellings, accessible and adaptable dwellings, wheelchair user dwellings (Volume 1) and buildings other than dwellings (Volume 2) respectively (AD Part M 2015);
  - M4(2) compliance will be met where a new dwelling makes reasonable provision for most people to access the dwelling and incorporates features that make it potentially suitable for a wide range of occupants, including older people, those with reduced mobility and some wheelchair users. M4(3) compliance will ensure that a unit can demonstrate that the dwelling is capable of meeting the functional and spatial provisions for a wheelchair adaptable or wheelchair accessible dwelling (AD Part M, 2015).

## **Car Parking**

- Parking spaces designated for use by disabled people should be 2.4m wide by 4.8m long with a zone 1.2m wide provided between the designated spaces and at the rear outside the traffic zone, to enable the disabled driver or passenger to get in or out of a vehicle and access the boot safely (AD Part M 2015, diagram 2);
- Spaces for blue badge holders should be provided as close as possible, preferably within 50m of the facilities served by the car park with level or ramped access, and undercover if possible (DfT, 2005).

#### **Approach Route and Levels**

- The approach route should be safe and convenient, for everyone, be at the shallowest gradient that can reasonably be achieved, and be step-free, irrespective of the storey on which the dwelling is located (Part M, Volume 1, 2016);
- External and internal ramps should: have a gradient between 1:20 and 1:15; have top and bottom landings; an intermediate landing provided between individual flights at any change of direction and every landing is level and a minimum of 1200mm clear of any door (or gate) swing (Part M, Volume 1, 2016);
- If Site constraints necessitate an approach of 1:20 or steeper, an approach incorporating ramped access should be provided (Part M, Volume 2, 2016); and
- Accessible entrances should be clearly sign-posted and easily recognisable....The route from the exterior across the threshold should provide weather protection, and not present a barrier for wheelchair users or a trip hazard for other people. A level threshold is preferred, especially for doors in frequent use (Part M, Volume 2, 2016).

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#### **Accessible Entrances**

Accessible entrances must provide a level threshold or, if raised threshold is unavoidable, it has a total height of not more than 15mm (AD Part M Volume 2, para. 2.7).

#### **Reception Desks**

• Any reception desk counter should be designed to accommodate both standing and seated visitors such that at least one section of the counter to be at least 1500mm wide, with its surface no higher than 760mm, and a knee recess, not less than 700mm, above floor level (AD Part M Volume 2, para. 3.6).

#### Wheelchair Accessible Toilets

- Wheelchair- accessible unisex toilets will satisfy Part M if one is located as close as possible to the entrance and/ or waiting area of the building (AD Part M Volume 2, para. 5.10);
- Wheelchair- accessible unisex toilets should be located in a similar position on each floor of a multi-storey building, and allow for right and left hand transfer on alternate floors or a choice of layouts suitable for left-hand and right-hand transfer when more than one unisex toilet is provided (AD Part M Volume 2, para 5.10);
- Any wheelchair user does not have to travel more than 40m on the same floor unless a greater distance can be agreed with the building control body on the grounds that the circulation route is unobstructed, e.g. by the installation of doors with hold-open devices (AD Part M Volume 2, para 5.10).

#### **Wheelchair Accessible Showers**

- Where showers are provided in commercial development for the benefit of staff, at least one wheelchair-accessible compliant shower compartment should be provided (AD Part M Volume 2, para 5.18, Diagram 23);
- Changing facilities must provide a manoeuvring space 1500mm deep in front of lockers in self-contained or communal changing areas (AD Part M Volume 2, para 5.18).

#### Safe Means of Escape

- A safe means of escape for disabled people should be provided (BS9999, 2017, para 45.5);
- It might be necessary to include any of the following features in the design of an escape route to cater for those with mobility impairments:
  - Making use of horizontal evacuation to a different fire compartment;
  - The use of lifts;
  - Making all escape routes accessible, e.g. adding ramps if necessary;
  - Fitting extra handrails and step edge marking (BS9999,2017, para. 46.2);
- Personal emergency evacuation plans are recommended for all people requiring assistance to leave the building (BS9999,2017, para 46.7).

## **Landscaping/ Public Realm**

- Street furniture should be provided in a consistent pattern and not create obstructions on the footway. They should have good contrasting features and at the same time not cause glare as can be the case with stainless steel (GDBA, 2010);
- Streets should be kept clear of obstacles and clutter, assisting those with visual impairments when using the space (RNIB, 2015); and
- Material, features and street furniture should have good tonal and colour contrast to enhance visibility for blind and partially sighted people with some residual vision (GDBA, 2010).

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## 3. DEVELOPMENT PROPOSALS

#### 3.1 General

3.1.1 The Site currently comprises 1,217sqm of retail floorspace (A1/A2), 226sqm of office floorspace and a private car park, with no disabled spaces. The Site is owned by LBRuT, including the existing car park.

#### 3.2 Land Uses

3.2.1 The proposals entail the demolition of the existing buildings and the construction of two new buildings, linked with a bridge. The quantum of development presented in **Table 1.** 

UNIT	LAND USE	QUANTUM
Unit 1	A1	244sqm
Unit 2	B1	250sqm
Unit 3	A3	274sqm
Unit 4	A1 / A3 / D1	62sqm
Unit 5	A3	231sqm
Residential	C3	39 units (18 no. 1-bed, 19no. 2-bed, 2no. 3-bed)

**Table 1. Proposed Development** 

- 3.2.2 All the retail uses will be on the ground floor, with residential units on the three upper floors. Given the level changes across the Site, a podium will be created, with the area beneath the buildings (lower ground floor level) hosting car and cycle parking.
- 3.2.3 As part of the development, a new public square will be provided, alongside improved access and permeability.

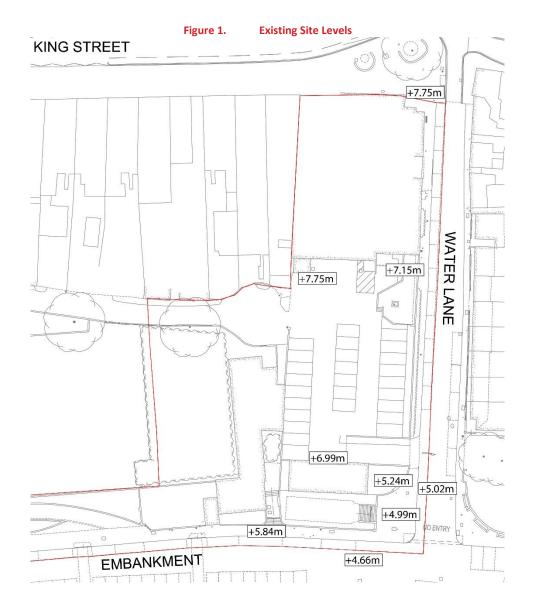
#### 3.3 Ground Levels

3.3.1 As mentioned above, the Site has numerous levels changes across it, which have made it particularly inaccessible for over 30 years. The Proposed Development will encompass the construction of a single podium aligned with the highest level from King Street.

## **Existing Ground Levels**

3.3.2 Currently the existing car park, accessed from Water Lane, is built on a slightly sloped podium (to the south) from +7.76m to approximately +7m, with various ramps and steps ranging the levels across the Site. The existing level changes can be seen in **Figure 1** overleaf.

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## **Proposed Site Levels**

3.3.3 As a whole, the Site slopes from +7.76m at King Street, down Water Lane, to +4.8m on The Embankment; this can be seen in **Figure 2** and **Figure 3** overleaf. Due to these constraints, the development will be built on a podium at a level of approximately +7.76m to +7.90m, with steps leading down to the +4.850m level on The Embankment.

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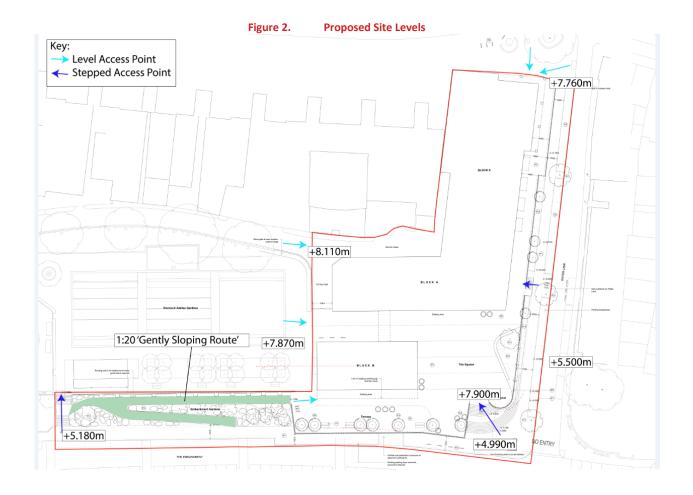


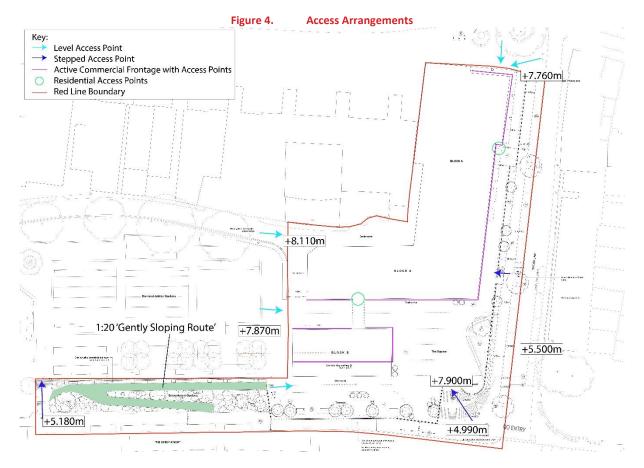
Figure 3. Proposed Section of Podium, from Water Lane



## 3.4 Access Arrangements

3.4.1 The Proposed Development will be constructed on a podium, to align with the existing level of King Street (+7.87) and Diamond Jubilee Gardens (+7.76m). A plan of the access arrangements around the Site can be seen in **Figure 4** overleaf. Currently much of the Site including Diamond Jubilee Gardens is inaccessible, the proposed access arrangements aim to considerably improve this.

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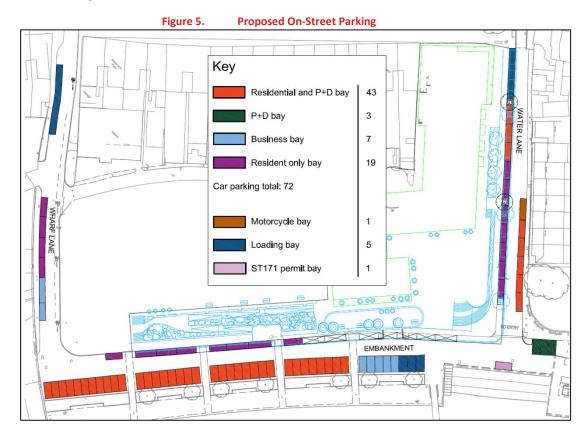


- 3.4.2 Level access is provided to all entrances of the development, from King Street, Water Lane and Wharf Lane (through the Diamond Jubilee Gardens), with the landscaping creating a welcoming, inclusive environment.
- 3.4.3 Vehicular access to the lower ground floor car park will be taken from the Embankment. This location was selected because it minimises excavation and ramp length, whilst maximising visibility of oncoming vehicles. The existing vehicular access off Water Lane will be removed. The proposed vehicular crossover includes appropriate dropped kerbs and tactile paving to assist those with visual impairments.
- 3.4.4 A new pedestrian and cyclist step-free access to the Site / Diamond Jubilee Gardens will be provided from the Embankment, with a 1:20 ramp, improving north-south permeability.
- 3.4.5 A new stepped access will be created at the Water Lane/The Embankment junction in the southeast corner of the Site. With appropriate tactile paving and colour contrast, this will provide connectivity to the Embankment and Eel Pie Bridge. A second stepped access will also be provided off Water Lane, to retain east-west permeability through the Site. This can be seen in **Figure 4**.
- 3.4.6 Delivery and servicing vehicles will be able to utilise the existing cul-de-sac off Wharf Lane, this will be managed and restricted to essential users: refuse collection, residents and staff of the King Street units and emergency vehicles. It is envisaged that the restriction will be achieved either through bollards or cameras, subject to discussions with LBRuT and the owner of the King Street commercial units.
- 3.4.7 Additionally, two new large dedicated loading bays will be provided on Water Lane and Wharf Lane, formalising servicing arrangements and minimising conflicts with pedestrians and cyclists (particularly on Wharf Lane). It is envisaged that deliveries to the Site will mostly

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use the Water Lane bay, whilst deliveries to the King Street commercial units (including Iceland) will use the Wharf Lane bay. The bays are 15-18m in length, and can be used by up to a 10m long rigid vehicle, ensuring that the footways and cycle lanes will be kept clear of vehicles at all times.

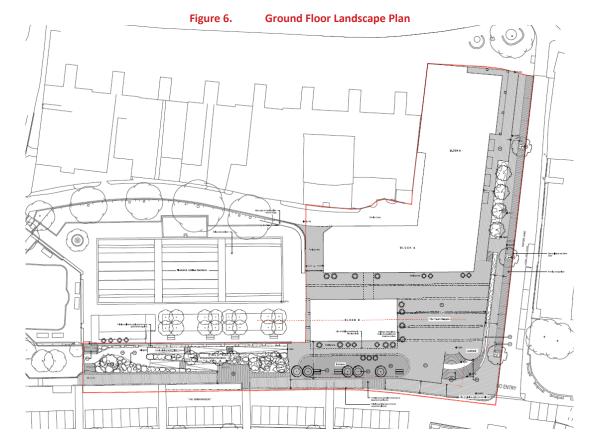
3.4.8 The plan showing the proposed on-street parking arrangement, including loading bays, is shown in **Figure 5**.



**Landscaping and Public Realm** 

3.4.9 The ground floor landscape plan is shown on **Figure 6** below.

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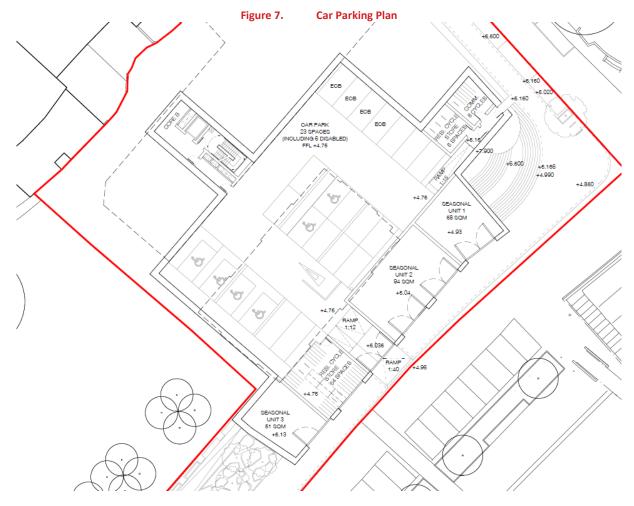


- 3.4.10 The lighting strategy consists of wayfinding lighting columns to the main access routes to aid orientation, with appropriate lights to tree and shrub planting as well as the hard landscape to ensure a flexible and safe use of space throughout the day/night. The lighting strategy will also encourage natural surveillance by the site users and surrounding residents/businesses.
- 3.4.11 Natural surveillance is also encouraged through the design of the development, overlooking the communal areas and improving the perceived safety through their presence.

## 3.5 Car Parking

- 3.5.1 The Proposed Development will be built on a podium, and therefore the area under the podium will have to be excavated, to build a supporting structure. The basement area provides the opportunity to provide long-stay car parking associated with all the proposed land uses on Site. A plan of the car parking can be seen in **Figure 7** overleaf.
- 3.5.2 A total of 23 spaces will be provided on Site, 19 for residents (including 4 disabled bays), two disabled bays for the commercial land use and two spaces allocated to residents or staff members depending on future demand.
- 3.5.3 20% of all spaces will be designated for electric vehicle, with an additional 20% passive provision for electric vehicles in the future. It is noted that no parking will be provided for the one bedroom units.

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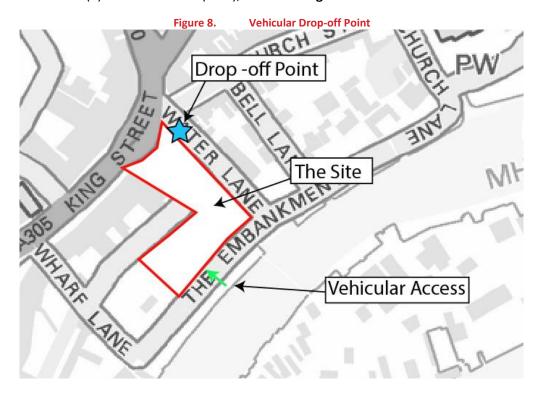
#### **Residential Parking**

- 3.5.4 A total of 19 parking spaces are provided for the residential land uses at lower ground floor level, which is accessed via The Embankment.
- 3.5.5 Four spaces in the lower ground floor car park are provided as disabled bays. This quantum is in accordance with the Housing SPG, which states that one disabled parking space should be provided per accessible wheelchair unit. One of the disabled bays provide 1200mm clear access zones to both sides of the bay to allow additional space for a disabled driver or pedestrian to access the vehicle. Three of the disabled bays provide 1200mm clear access zone to one side of the bay.
- 3.5.6 The disabled spaces will be located as close as possible to the residential lift core to minimise the distance travelled to the accessible flats. This is in accordance with DfT guidance that states "spaces for blue badge holders should be provided as close as possible, preferably within 50m, of the facilities served by the car park with level or ramped access, and undercover, if possible" (DfT, 2002).
- 3.5.7 Furthermore, one parking space provides a 900mm access zone to one side of the bay in accordance with AD Part M (2015), M4(2) standards and is provided from the outset. This is to serve the single lift core that transports people from the lower ground floor car park to all residential flats.

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#### **Residential Drop-off**

3.5.8 Taxi and private pick-up/drop-off will take place on-street from Water Lane, within 50m of the residential entrances of the eastern side of the development (45m) and in close proximity to the M4(3) accessible units (85m), as seen in **Figure 8**.



## **Non-Residential Car Parking**

- 3.5.9 Two disabled parking bays will be provided in the lower ground floor car park for office and retail staff. These will be located as close as possible to the lift core and provide level access from the space to the desired workplace.
- 3.5.10 This is a provision above policy, which states that 1 disabled parking space must be provided as a minimum for developments with no dedicated parking (the London Plan).
- 3.5.11 Two additional overspill spaces will also be provided for either the commercial or residential land uses, based on demand.

## 3.6 Cycle Parking

#### **Long-Stay Cycle Parking**

3.6.1 The basement area will also host the long-stay cycle parking required to comply with London Plan requirements (see **Table 2**). For Units 1 and 4, the most onerous Use Classes have been assumed (A1 Food Retail and A3 Retail respectively).

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Table 2. Long-Stay Cycle Parking

LAND USE	UNITS	QUANTUM	STANDARD	REQUIREMENT
A1 Food Retail	Unit 1	244sqm	1 per 175sqm	2
B1 Office	Unit 2	250sqm	1 per 150sqm	2
A3 Retail	Units 3, 4 and 5	567sqm	1 per 175sqm	4
C3 Residential	1-bed	18	1 per unit	18
C3 Residential	2+ bed	21	2 per unit	42
Total				68

- 3.6.2 A total of 68 long-stay cycle parking spaces will be provided at lower ground floor level in accordance with minimum standards, using a mixture of Sheffield-style stands and two-tiered Josta Stands. Separate, safe and secure stores will be provided for the residential and commercial elements of the Proposed Development. Fobs will ensure cyclists can only enter the designated areas and stores.
- 3.6.3 The Sheffield style stands also cater to enlarged bicycles for those with mobility impairments.
- 3.6.4 A dedicated level access cyclist entrance will be provided on Water Lane, but cyclists will also be able to use the main vehicular entrance from the Embankment.
- 3.6.5 Given the small quantum of non-residential cycle parking, it is not proposed to provide any showers or lockers, although these may be provided by individual tenants in their buildings.

#### **Short-Stay Cycle Parking**

3.6.6 London Plan-compliant short-stay cycle parking will be provided on Site. The number of cycle parking spaces required for each land use is outlined in **Table 3**.

**Table 3. Short-Stay Cycle Parking** 

LAND USE	UNITS	QUANTUM	STANDARD	REQUIREMENT
A1 Food Retail	Unit 1	244sqm	1 per 40sqm	7
B1 Office	Unit 2	250sqm	1 per 500sqm	1
A3 Retail	Units 3, 4 and 5	567sqm	1 per 40sqm	15
C3 Residential		39	1 per 40 units	1
Total				24

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- 3.6.7 The development will provide 13 Sheffield-style stands on the footways and in the public realm, exceeding policy requirements and encouraging sustainable travel to and from the Site.
- 3.6.8 The proposed locations of short-stay cycle parking spaces are:
  - Two stands at the top of the accessible ramp from the Embankment to the Site;
  - Two stands at the southern end of on Water Lane, fronting the feature staircase;
  - Two stands near the midpoint of Water Lane, fronting the steps to the podium;
  - O Four stands on King Street, fronting the development; and
  - Three stands on the podium, at the rear of the loading area.
- 3.6.9 The cycle spaces have been strategically located at the edges of the development, to discourage people from cycling through the main square. The location has been informed by the expected desire lines, with most cyclists expected to arrive from King Street, the Embankment and Wharf Lane / Service Road.
- 3.6.10 As agreed with LBRuT, all the short-stay spaces associated with the Proposed Development have been located on the footways adjacent to the Site. The spacing of the stands is in line with the London Cycling Design Standards.

## **Building Circulation**

- 3.6.11 Two lift cores will be provided for residential use on Site, one in the northern building and one in the southern building, which will also serve the lower ground floor car park.
- 3.6.12 Part M Volume 1 M4(3) states that a communal passenger lift dimensions should comply with:
  - A clear landing, a minimum of 1500mm long and 1500mm wide, is directly in front of the lift door at every floor level;
  - Is equivalent or complies with requirements of BS EN 81-70:2003 for a type 2 lift;
  - The lift car is a minimum of 1100mm wide and 1400mm deep; and
  - O Doors have a clear opening width of 800mm.
- 3.6.13 Two staircases will also be provided, one in each building, providing access to each level including the lower ground floor and rooftop levels. The staircases will be accessible from the ground floor, with the southern building's also leading down to the lower ground floor car park.

#### 3.7 Residential Land Uses

#### M4(2) 'Accessible and Adaptable Dwellings'

- 3.7.1 Of the 39 residential units, 90% (35) will comply with Part M4(2) standards with wide doorways and circulation space, an entrance level accessible bathroom and window heights in living spaces starting no higher than 850mm above floor level.
- 3.7.2 **Figure 9, Figure 10** and **Figure 11** below provide example M4(2) 'Accessible and adaptable' 1B2P, 2B4P and 3B5P unit layouts respectively.

Figure 9. M4(2) Unit Layout – (Flat Type B106/206 1B2P)

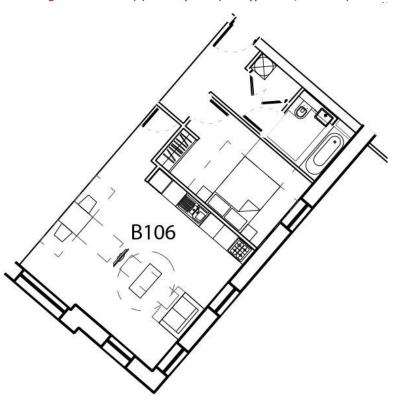
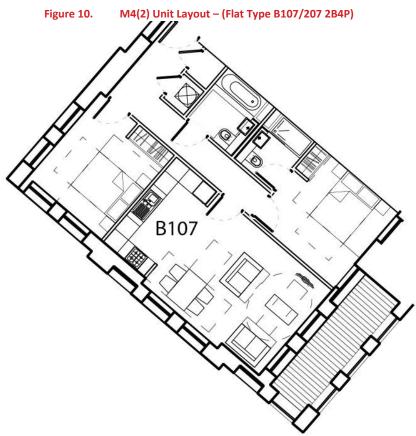
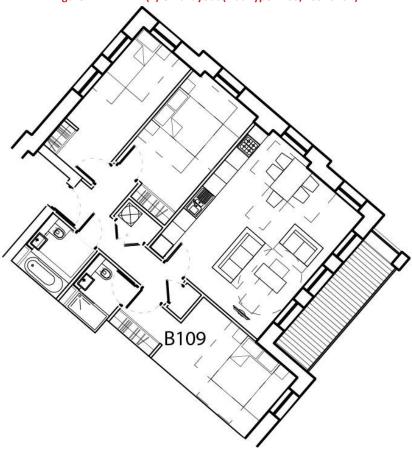


Figure 10.



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Figure 11. M4(2) Unit Layout (Flat Type B109/209- 3B5P)



3.7.3 **Table 4** lists the key standards for an accessible and adaptable dwelling, as specified in Part M4(2) which provides a list of the key requirements. This demonstrates that each unit complies with these standards.

Table 4. M4(2) Accessible and Adaptable Dwellings

	Table 4: 1114(2) Accessible and Adaptable Divellings	
Criteria		Compliant
Approach route	The approach route should be step-free, with a minimum clear width of 900mm in private areas and 1200mm in communal areas. Gateways should have a minimum clear opening width of 850mm.	Υ
External ramps	The gradient should be between 1:20 and 1:12. Every flight should have a minimum clear width of 900mm. A landing a minimum 1200mm long should be provided.	Υ
External steps	Every flight should have a minimum clear width of 900mm, and have top, bottom and where necessary intermediate landings, with a minimum length of 900mm.	Y
Car parking	In communal areas, at least one parking bay should be provided close to the communal entrance of each core and should have a minimum clear access zone of 900mm on one side.	Y
Drop-off	Any drop off area is close to the principal communal entrance.	Υ

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Criteria		Compliant
Communal entrance	There should be a level landing of minimum 1500x1500mm directly outside the entrance. The door should have a minimum clear opening width of 850mm.	Y
Communal lifts	There should be a clear landing of minimum 1500x1500mm directly in front of the lift door at every level. The lift car is a minimum of 1100x1400mm and its doors have a minimum clear opening width of 800mm.	Y
Communal stairs	The stair should meet the requirements of Part K for a general stair.	Y
Private entrance	There should be a level external landing of minimum 1200x1200mm and the entrance door should have a minimum clear opening width of 850mm.	Y
Internal doorways and hallways	The minimum clear width of every hall or landing should be 900mm, which is not reduced below 750mm where there are localised obstructions. The minimum doorway width should be suitable for the width of hallway, as outlined in Table 2.1 in AD Part M.	Y
Private stairs	Access to all rooms on the entrance storey should be step-free. The minimum clear width of the stair should be 850mm.	Y
Living, kitchen and eating areas	A living area should be provided on the entrance level. A minimum clear space of 1200mm should be provided in front of and between all kitchen units and appliances.	Y
Bedrooms	Every bedroom should have a clear access route a minimum 750mm wide from the doorway to the window. The principal double bedroom should have a clear access zone a minimum 750mm wide to both sides and the foot of the bed. All other double bedrooms should have a minimum 750mm wide clear access zone to one side and the foot of the bed. All single and twin bedrooms should have a minimum 750mm clear access zone to one side of each bed.	Y
WC facilities on the entrance storey	A step free WC and basin should be provided on every entrance storey. The WC should meet the standards required for a building with its number of storeys. A minimum 750mm clear access zone should be provided in front of the WC in the accessible bathroom. Doors should open outwards.	Y

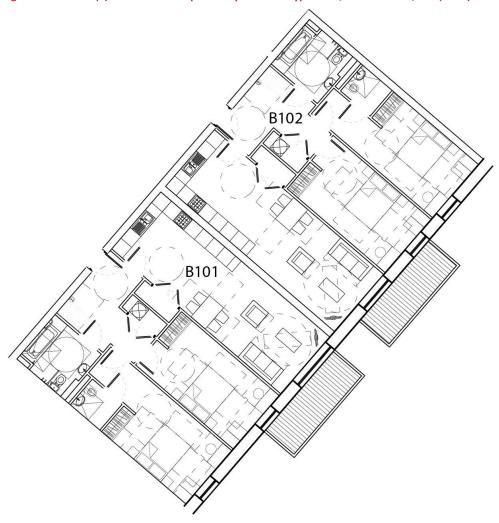
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Criteria		Compliant
Bathrooms	A bathroom containing a WC, basin and a bath should be located on the same floor as the principal double bedroom. A 750mm clear access zone in front of WCs should be provided. Doors should open outwards. The accessible bathroom should have a 750mm radius clear access turning circle, clear of any stack or drainage positions.	Y
Services and controls	Switches, controls and door handles should have their centre line between 450-1200mm above floor level. Consumer units should be mounted so that the switches are 1350-1450mm above floor level.	Y

## M4(3) 'Wheelchair User Dwellings'

- 3.7.4 A total of 4 (10%) of the units are designed to meet M4(3) adaptable and accessible standards, and will be capable of adaptation
- 3.7.5 The M4(3) units provide four two bedroom units, two on the first floor and two immediately above (with the same layout) on the second floor. An example of two of the flats is shown in **Figure 12** overleaf.
- 3.7.6 Due to the limited number of total dwellings provided alongside the unit mix, which mainly consists of 1B and 2B dwellings, providing four, two bedroom units, is considered acceptable. Two bedroom units also cater to those who require a carer and provide more space overall. All the accessible units will be sold as private flats.

Figure 12. M4(3) Wheelchair Adaptable layout – Flat type B101/201 and B102/202 (2B4P)



3.7.7 **Table 5** lists the key standards for wheelchair accessible housing, as specified in Part M4(3). This demonstrates that each wheelchair unit complies with these standards.

Table 5. M4(3) Wheelchair User Dwellings

M4(3) Unit Red	quirements	Number of Bedspaces		Compliant	
		1 2 3 4			
Approach Route	The approach route should be step-free, with a minimum clear width of 1200mm in both private and communal areas. A passing space of minimum 1500x1500mm should be provided at each end. Gateways should have a minimum clear opening width of 850mm.				Υ
External ramps	The gradient should be between 1:20 and 1:15 and the length of flights is dependent on the gradient. Every flight should have a minimum clear width of 1200mm.				Y
External steps	Every flight should have a minimum clear width of 900mm, and have top, bottom and where necessary intermediate landings, with a minimum length of 900mm. Single steps should be avoided.			Υ	

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M4(3) Unit Red	quirements	Number o	f Bedspac	es		Compliant
Car parking	In communal areas parking bays should have a minimum clear access zone of 1200mm to both sides. Parking in private areas should be standard bays with a minimum clear access zone of 1200mm to one side and the rear.		N – One disabled parking space has 1200mm clear access zone to both sides all other disabled bays have 1200mm clear access zone to one side.			
Drop-off	Any drop off area is close to	the principal co	mmunal entr	ance.		Y
Communal entrance	There should be a level land entrance. The door should holes turning circle 1500mm area.	nave a minimum	clear opening	g width of 8	50mm. A	Υ
Communal lifts	There should be a clear land the lift door at every level. I doors have a minimum clear	he lift car is a m	inimum of 11			Y
Private entrance	There should be a level external landing of minimum 1500x1500mm and the entrance door should have a minimum clear opening width of 850mm. A clear turning circle 1500mm in diameter should be provided inside the entrance area.			Υ		
Internal doorways and hallways	The minimum clear width of every hall or landing should be 1050mm, or 1200mm where the approach to a doorway is not head-on. The minimum doorway width is 850mm.				Υ	
Wheelchair Storage	A minimum 1100x1700mm preferably close to the princ front of it a minimum 1200r	ipal private ent	rance. It shou	ld have a cle	ear zone in	Y
General Storage	Minimum built-in storage requirements should be met (m²) *Note: requirements are per bedroom rather than per bedspace.	1.5 2	2.	5	3	Υ
Through-floor lifting device provision	Provision for a liftway a min areas at every floor in the d'adaptable', this space shou alteration. A minimum 1500 the liftway.	welling should b Id be able to be	e made. Whe provided with	re the dwel nout structu	ling is ıral	Υ
Private stairs	Access to all rooms on the e clear width of the stair shou future stair lift provision.					Υ
Floor areas	Minimum combined floor area for living, dining and kitchen space (m²)	NA 2	25 27	7 :	29	Υ

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M4(3) Unit Rec	3) Unit Requirements		er of Beds		Compliant	
Kitchen worktop	Minimum length of kitchen worktop, including fittings and appliance – wheelchair adaptable (mm)	NA	4330	4730	4730	Y
lengths	Minimum length of kitchen worktop, including fittings and appliance – wheelchair accessible (mm)	NA	6130	6530	6530	Υ
Height adjustable worktop	The worktop includes a cont of being re-fixed at alternati 300mm worktop each side corner.	ve height) v	vith no white	e goods bene	eath it. Minimum	Y
Clear access zones	There is a minimum clear ac kitchen units and appliances		500mm wide	e in front of a	and between all	Y
	Arm chair or number of sofa seats (850mm x 850mm)	NA	2	3	1	
Furniture – Living Space	3 seat settee (850mm x 1850mm)	NA	NA	NA	1	
	TV	NA	1	1	1	Y
	Storage Units (500 x mm length shown)	NA	1000	1000	1500	
Furnitura Dining	Dining Chair	NA	2	3	4	
Furniture – Dining Space	Dining Table (800 by length shown mm)	NA	800	1000	1200	
Access to window	Every bedroom can provide a minimum 750mm clear access route from the doorway to the window.					Υ
Manoeuvring zone	Every bedroom can provide a minimum 1200x1200mm manoeuvring space inside the doorway, clear of the bed and the door (when the door is in closed position).				Y	
Hoist	The ceiling structure to every bedroom is strong enough to allow for the fitting of an overhead hoist capable of carrying a load of 200kg.					Υ
Principal Double Bedroom	Minimum floor area of 13.5m². Minimum 3m wide. 1000mm clear access zone to both sides and foot of the bed and in front of all furniture 1200mm by 1200mm manoeuvring space of both sides of the bed.					Y

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M4(3) Unit Red	quirements	Numb	er of Bed	spaces		Compliant
Other Bedrooms	Double/Twin – Minimum floor area 12.5m².  Double – 1000mm clear access zone to one side and foot of double bed and in front of all furniture.  Single – Minimum floor area 8.5m².  Single – 1000mm clear access zone to one side of each bed and in front of all furniture.				Y	
	Principal bedroom Double Bed (2000mm x 1500mm)	NA	1	1	1	
	Other bedroom Double Bed (1900mm x1350mm)	NA	1	1	1	_
	Single Bed (1900mm x 900mm) (2 no. in twin)	NA	2	2	2	_
Furniture – Double Bedroom	Bedside Table (400mm x 400mm)	NA	2	2	2	Y
	Desk and Chair (500mm x 1050mm)	NA	1	1	1	
	Chest of Drawers (450mm x 750mm)	NA	1	1	1	
	Double Wardrobe (600mm x 1200mm)	NA	1	1	1	
	Single Bed (2 number in twin) (1900mm x 900mm)	NA	NA	NA	2	
	Bedside Table (400mm x 400mm)	NA	NA	NA	2	_
Furniture - Twin Bedroom	Chest of Drawers (450mm x 750mm)	NA	NA	NA	1	Y
	Table and Chair (500mm x 1050mm)	NA	NA	NA	1	
	Double Wardrobe (600mm x 1200mm)	NA	NA	NA	1	
Furniture - Single Bedroom	Single Bed (2 number in twin) (1900mm x 900mm)	NA	NA	1	1	
	Bedside Table (400mm x 400mm)	NA	NA	1	1	<b>Y</b>
	Chest of Drawers (450mm x 750mm)	NA	NA	1	1	
	Table and Chair (500mm x 1050mm)	NA	NA	1	1	

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M4(3) Unit Requirements		Number of Bedspaces			Compliant	
	Double Wardrobe (600mm x 1200mm)	NA	NA	1	1	
Minimum Sanitary Requirements (single story dwellings)	2 or 3 Bedspaces - Bathroom with level access shower 4 Bedspaces - Bathroom with level access shower and separate WC/ cloakroom 5 Bedspaces or more - Bathroom with level access shower and separate WC/cloakroom. Wheelchair accessible dwellings must also provide both a level access shower and a bath.			Y		
Doors	Bathroom doors open outwards			Υ		
Turning Circle	Bathrooms provide a minimum 1500mm clear turning circle					
	1100mm x 700mm clear access zone beside the bath					
Bathroom – clear	1100mm x 700mm clear space in front of the basin (maximum 200mm encroachment of wash basin)					_
access zones (Wheelchair Adaptable)	1100mm clear space provid	ed in front of WC		Y		
Adaptable	1500mm diameter turning o	g circle which may overlap fully with shower				
	450mm-500mm between the centreline of the WC and the nearside wall.					
	1700mm by 800mm clear access zone beside bath			-		
(Wheelchair		cess zone, measured from the back of the basin.  overlap 500mm maximum with level access shower.		Y		
				- -		
	450mm-500mm between the centreline of the WC and the nearside wall.					
WC/ Cloakroom	750mm clear space in front 450mm between the WC ce		nd adjacent w	all.		Y
Services	Switches, controls and at least between 700-1000mm above 450-1200mm above floor least section 100 february 200 february 20	e floor leve				Y
Every outdoor space		lear width	of 1500mm.			V
Space	Every door to a private exte minimum clear opening wid			ted to a dw	elling has a	Y

## **Roof Terraces – Level 3**

3.7.8 Communal open space for the residents of the development will be provided on Level three, with level access provided via the residential lift to the north of the Site, accessible from all floors and all residents. Seating with backrests and arm rests will be provided at a minimum of 50m intervals in accordance with DfT guidance on Inclusive Mobility (2005).

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#### 3.8 Non-residential Land Uses

- 3.8.1 Non-residential land uses include retail and office use at ground floor level of both buildings. These will be designed to meet Approved Document Part M (AD Part M), 2015 Edition, Access To and Use of Buildings- Volume 2: Buildings Other Than Dwellings as a minimum.
- 3.8.2 As the development is built on a podium due to the gradient change, level access will be provided from Kings Street/Water Lane, as existing, and from The Embankment via a 1:20 ramp. People will also be able to enter the development through Diamond Jubilee gardens.
- 3.8.3 Stepped access will be provided from The embankment and from Water Lane, maintaining the east to west permeability.

## 3.9 Safe Means of Escape

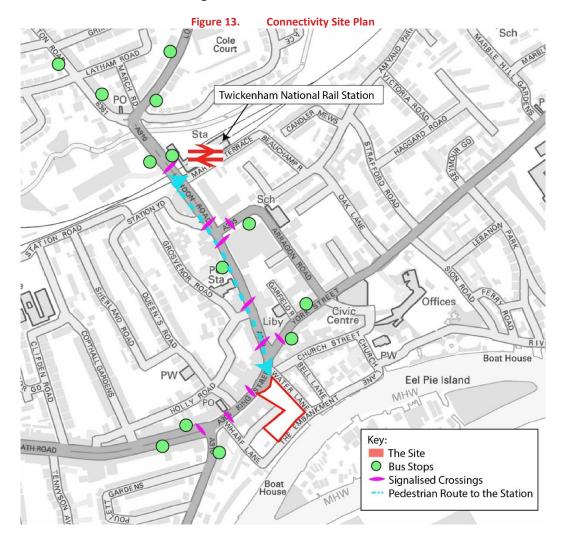
- 3.9.1 The development will provide personal emergency evacuation plans (PEEPs) for all people requiring assistance to leave the building, including visitors, as recommended in BS 9999 (2017). If carried assistance is required, this can be discussed with the induvial concerned and incorporated into their PEEP (BS 9999, para 45.10).
- 3.9.2 All staff members of the commercial land uses, will be aware of the procedure for assisted evacuation. Visitors will be required to be escorted by a responsible person who has an understanding of the evacuation procedure. The evacuation of individuals in the refuges will not rely on fire service intervention and will be conducted by an identified responsible individual, as outlined in BS 9999 (2017).
- 3.9.3 Those escaping from the car park have direct level access to the Embankment via a 1:40 ramp and access to Water Lane via a 1:15 ramp. Therefore, it is expected that all site users will be able to safely escape via this route and take refuge adjacent to the river.

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## 4. WIDER TRANSPORT LINKS

## 4.1 General

- 4.1.1 This section summarises the connectivity of the Site by a choice of transport modes with specific reference to the requirements of vulnerable and disabled users.
- 4.1.2 **Figure 13** shows a connectivity plan of the local area within the vicinity of the site, which should be referred to throughout this section.



## 4.2 Public Transport

#### **National Rail**

- 4.2.1 The closest National Rail Station to the Site is Twickenham, located approximately 500m to the northwest. This station is served by South West Trains and provides access to Wimbledon, Reading and London Waterloo, alongside all calling stops. Key services and peak hour frequencies from this station are:
  - London Waterloo (seven trains per hour);
  - Reading (three trains per hour);
  - Stratford (three trains per hour);

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- O Windsor and Eton Riverside (two trains per hour); and
- Wimbledon (two trains per hour).
- 4.2.2 Twickenham is fully accessible to wheelchairs users via staff-operated stair lifts or the car park. Staff are available to assist passengers between 06:15 and 22:45 hours, with ramps for train access, wheelchairs and step free access coverage throughout.
- 4.2.3 An accessible toilet is also provided at the station, operated by staff.

#### **Buses**

- 4.2.4 There are multiple bus routes serving the area with bus stops located at strategic points around the Site, as shown on Figure 13.
- 4.2.5 The closest bus stops to the Site are located on York Street, approximately 100m east of the Site. Services include:
  - 110 between Arragon Road and West Middlesex Hospital;
  - 290 between Staines and Twickenham;
  - 281 between Hounslow Bus Station and Tolworth Tower;
  - 33 between Fulwell Station and Hammersmith Bus Station;
  - 490 between Heathrow Terminal 5 and Pools on the Park (Richmond);
  - R68 between Hampton Court Station and Kew Retail Park;
  - R70 between Manor Road / Sainsbury's (Richmond) and Nurseylands Shopping Centre;
  - O H22 between Manor Circus and Bell Road / Bell Corner (Hounslow); and
  - 267 between Fulwell Station and Hammersmith Bus Station.
- 4.2.6 All TfL busses are fully accessible with low floors and adequate space for wheelchairs. Clearly marked priority seats are also available for anyone who needs them, with CCTV used extensively across the network.

#### 4.3 Walking

- 4.3.1 There is a significant level difference across the Site, with the land sloping down towards the River Thames. This level change currently creates severance and limits the opportunities for permeability. The current access points to the Site are:
  - King Street: entrances to shops;
  - Water Lane: one entrance to the Santander and one vehicular entrance to the private car park, connecting through to the service mews. A painted line demarcates the pedestrian access along the ramp to the car park.
  - The Embankment: stepped accesses to the Site and to Diamond Jubilee Gardens
  - Wharf Lane: step-free access to Diamond Jubilee Gardens, vehicular access to the service mews and servicing access for the Iceland Supermarket.
- 4.3.2 The permeability of the Site is currently poor, with no step-free access from the Embankment and few access points to Diamond Jubilee Gardens. The service mews provides east-west connectivity, but it is an unsafe environment for pedestrians and cyclists.

#### The Embankment

4.3.3 The Embankment runs along the River Thames waterfront between Wharf Lane and Church Lane. It varies in width and has considerable parking on both sides of the road, whilst there is a segregated promenade along the waterfront for pedestrians and cyclists.

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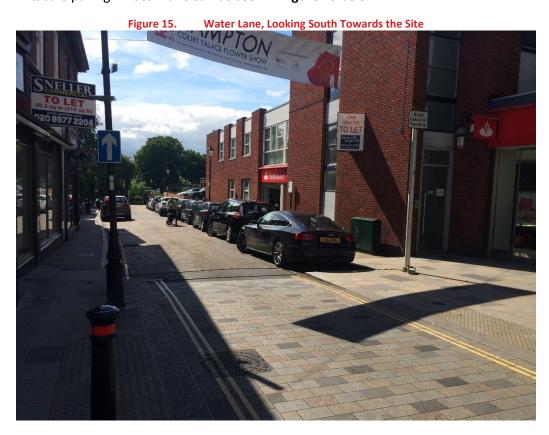
4.3.4 Immediately outside the Site the footways are approximately 2m wide, and comprise smooth paving slabs. Appropriate dropped kerbs and tactile paving are provided at crossings/vehicular crossovers in the vicinity and lead to a pedestrian/cyclist bridge onto Eel Pie Island, which can be seen in **Figure 14.** 

Figure 14. Bridge to Eel Pie Island, Looking Towards the Site



#### **Water Lane**

4.3.5 Water Lane runs along the eastern edge of the Site and connects with The Embankment and King Street. The footways are slightly narrower than The Embankment; however, follow the same design with smooth paving slabs on both the eastern and western footways. Dropped kerbs are provided at the existing vehicular access point, into the Site, however, there is no tactile paving. Water Lane can be seen in **Figure 15** below.



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## **King Street**

4.3.6 King Street borders the Site to the north and supports a number of retail and commercial enterprises. The footways on the southern side are approximately 6 to 12 metres wide depending on location and widen to 12 metres at the junction with Water Lane. This caters to the retail footfall and comprises smooth paving slabs. No tactile paving is provided at the Water Lane/King Street crossing; however, appropriate dropped kerbs and colour contrast has been installed. King Street can be seen in Figure 16.



#### Cycling

- 4.3.7 Transport for London (TfL) produces Local Cycling Guides that map the cycle infrastructure across London. An extract from Local Cycling Guide 6 shows that Church Street is labelled as a route signed or marked for use by cyclists. Other cycling routes in the area include the A310 and the path on the southern bank of the Thames.
- 4.3.8 There is a southbound contraflow cycle lane on Wharf Lane, which connects to the shared footway further west, along Cross Deep.
- 4.3.9 There are eight Sheffield-style cycle stands on the southern footway of King Street, within 50m of the Site. There are an additional seven stands on the Embankment, just to the east of the Site.

#### 4.4 Vehicular Travel

4.4.1 The closest car club space is the "Twickenham – York Street" space operated by Zipcar near the Arragon Road / Church Street junction, approximately 230m east of the Site.

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- 4.4.2 There are two additional car club bays at the Richmond Road / Sion Road junction, 360m east of the Site, and two near Twickenham Station
- 4.4.3 Dial-a-Ride is an alternative travel option which can be used to access the Site. Dial-a-Ride offers a free door to door service for London residents who have a permanent or long- term disability which means they are unable to use public transport some or all of the time. This service will be promoted to employees and visitors to the Site via the Travel Plan.
- 4.4.4 In LBRuT, blue badge holders can park:
  - In a disabled persons' parking place at any time where no time limit is indicated;
  - In any Disabled Persons' Parking bay;
  - O In a resident permit holder parking place within a CPZ without payment or time limit;
  - In a business permit holder parking place within a CPZ without payment or time limits;
  - In a permit holder shared-use parking place within a CPZ without payment or time limit;
  - In a pay and display, metre or voucher bay without payment or time limit;
  - In free parking bays without time limit;
  - In council car parks without payment or time limit; and
  - On a single or double yellow line without payment for up to three hours provided that no loading prohibition is in force.
- 4.4.5 A plan showing the parking bay types within the vicinity of the Site can be seen in **Figure 17** below. It is noted that S171 permit bay is for an ice-cream van.



Figure 17. Existing On-Street Parking

## 4.5 Summary

4.5.1 In summary, the site benefits from a range of accessible modes of transport, therefore providing a choice to residents and visitors as to how to travel to/from as well as around the area.

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- 4.5.2 Currently blue badge holders can park for free and without time limit in any permit or pay and display bay in the vicinity of the Site. Several car club bays surround the Site, the closest located on York Street approximately 230m east of the Site.
- 4.5.3 Pedestrian and cycling routes are generally designed to a high standard, in accordance with or in excess of inclusive design standards and guidance.

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## 5. SUMMARY AND CONCLUSION

- 5.1.1 SYSTRA Ltd ('SYSTRA') has been commissioned by the London Borough of Richmond upon Thames ('LBRuT', 'the Applicant') to prepare an access statement for the proposed redevelopment of 1A, 1B King Street and 2/4 Water Lane, the site of the remaining former swimming pool buildings at the corner of Water lane and The Embankment and the riverfacing parcel of land on the Embankment in front of Diamond Jubilee Gardens in Twickenham, London TW1 3SD ('the Site').
- 5.1.2 The Proposed Development entails the demolition and removal of all existing buildings and structures, to provide a mixed-use development comprising:
  - Lower Ground Floor Level: a new vehicular access from the Embankment, parking for 23 cars and 68 cycles and three seasonal units (201sqm);
  - Ground Floor Level: 505sqm A3, 250sqm B1, 244sqm A1 and 62sqm flexible commercial floor space, a new public square and areas of public realm;
  - First, Second and Third Floors: 39 residential units (18 no. 1 bedroom, 19 no. 2 bedroom and 2 no. 3 bedroom, including 6 no. affordable homes); and
  - Public realm improvements, reconfiguration of on-street parking, improved pedestrian access and landscaping and an amendment of service vehicle access.
- 5.1.3 The proposed development has responded to inclusive design policy and guidance as the parking facility and residential land uses have been designed to be accessible for all, catering for a range of impairments.
- 5.1.4 Of the 39 units, 90% (35) of the units will comply with Part M4(2) standards with wide doorways and circulation space, an entrance level accessible bathroom and window heights in living spaces starting no higher than 850mm above floor level, or at the minimum height necessary to comply with the requirements of Part K for guarding to windows.
- 5.1.5 A total of four of the units are designed to meet M4(3) adaptable and accessible standards, all will be adaptable.
- 5.1.6 As the development will be constructed on a podium, the area beneath the podium will be used to provide car and long-stay cycle parking in line with policy requirements.
- 5.1.7 To improve pedestrian and cyclist safety and permeability, traffic movements are restricted, new stepped and step-free connections are provided and footway widths are increased, particularly on Water Lane and on the Embankment.
- 5.1.8 The car park will provide 23 residential car parking spaces, of which six will be blue badge spaces (four for residents and two for commercial land use).
- 5.1.9 Furthermore one parking space has been enlarged to provide a 900mm access zone to one side of the bay in accordance with AD Part M (2015), M4(2) standards.
- 5.1.10 Non-residential land uses include A1/A3 retail, B1 office and D1 community. These will be designed to meet Approved Document Part M (AD Part M), 2015 Edition, Access To and Use of Buildings-Volume 2: Buildings Other Than Dwellings as a minimum.
- 5.1.11 Level access is provided to all entrances of the development and the landscaping creates a welcoming inclusive environment. The vehicular crossover includes appropriate dropped kerbs and tactile paving to assist those with visual impairments. Tactile paving will also be included at the top and bottom of all stairs up to the podium level.

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- 5.1.12 Communal open spaces are created on the roof of the northern building, with level access provided from the residential entrances, which are accessible from all floors via lifts.
- 5.1.13 The site benefits from a range of accessible modes of transport, therefore providing a choice to residents and visitors as to how to travel to/from as well as around the area. Pedestrian and cycling routes are generally designed to a high standard, in accordance with or in excess of inclusive design standards and guidance.
- 5.1.14 The Access Statement has demonstrated compliance with each of these inclusive design requirements and has explained how the new development will create an inclusive and accessible environment for all users, regardless of disability. The Site significantly improves access across the Site, with a number of level access points from the north, south and west (and stepped access from the east).

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