

## INCLUSIVE ACCESS STATEMENT

31 The Green, Richmond, TW9 1LX

December 2023

This is a 'reasonable exemption statement' prepared by Michael Jones Architects for the planning application submitted for 31 The Green, Richmond, TW9 1LX.

In the formal pre-application feedback dated 16th October 2023, ref: 23/P0153/PREAPP it was advised that the applicant must provide an 'Inclusive Access Statement to address Building Regulations Requirement M4 (2) 'accessible and adaptable dwellings'. The proposed works are to convert offices of a bank back into a single family dwelling that it used to be originally. We have worked together with the specialist heritage consultants to ensure that the proposed development will be as inclusive and as accessible as possible within the constraints of the site, surrounding conservation area and Grade II listed building.

### Summary of Legislation, Policy and Guidance

Below is a summary of relevant policy and legislation we have considered when writing this statement.

#### The Disability Discrimination Act 1995 (DDA)

The Act was amended most recently by the Disability Discrimination Act 2005 to introduce further measures to prevent discrimination. A statutory Code of Practice (prepared by the Disability Rights Commission) has been produced which imposes a general duty on public authorities to promote disability equality when exercising their functions. The purpose of the Code is to give practical guidance on how to prevent discrimination against disabled people in accessing services to the public, private clubs and premises. Building Regulations

#### Planning Policy

Town and Country Planning Act 1990, section 76.

London Borough of Richmond Upon Thames Local Plan 2018, Policy LP35, Section E:

90% of all new build housing is required to meet Building Regulation Requirement M4 (2) 'accessible and adaptable dwellings' and 10% of all new build housing is required to meet Building Regulation Requirement M4 (3) 'wheelchair user dwellings'.

#### Building Regulations

The Building Regulations 2000: Access to and use of buildings, Approved Document M.  
Category: 2 M4 (2) 'Accessible and Adaptable Dwellings'.

### Conservation Area and Listed Building Considerations

31 The Green (the application site) is situated within the Richmond Green Conservation Area CA3, London Borough of Richmond Thames. The application site is a Grade II listed building and is a designated heritage asset under the parameters of the paragraph 203 of the National Planning Policy Framework (NPPF). Furthermore, 31

The Green should be considered in relation to paragraphs 206, 197, 199 of the NPPF as it is situated within the conservation area.

## **Proposal**

We seek consent for the following:

- Change of use from commercial back into residential use as the designated heritage asset was originally intended.
- Reinstate the original layout which is considered one of the key heritage benefits brought forward with this application.
- Provide a series of energy efficiency improvements accompanied by a list of public benefits.
- Alter the access arrangement to the rear garden from the proposed kitchen which is currently the commercial tenants meeting room.

## **Pedestrian Access**

There are no changes to the front elevation of the property and the existing access arrangement via the front door. Buildings in conservation areas present a challenge in terms of providing inclusive access. In most cases, which is also true to the application site, the level of the principal entrance lies above that of the street and is reached by a short flight of steps. To preserve the historic appearance of the building and considering that existing structure is being maintained, a permanent ramp or platform lift solution is not achievable.

The only solution possible is a provision of a portable ramp to the front entrance when required. Existing door to the property is wide enough and meets the minimum opening requirement for a wheelchair user.

## **Vehicular Access**

We propose this site to become car-free as part of the public benefits proposed to be brought forward as a result of our application. Vehicular access, parking space size and access between parking space and front door requirements set out in AD M4(2) do not apply to this application.

There are, however, disabled parking bays available on the road in front of the property and dropped kerb is present on the pavement so step-free access to the front door via use of portable ramp would be possible if required.

## **Internal Alterations**

The proposal includes internal alterations as follows:

- Reinstatement of the historic compartmentalised plan layout the Grade II listed dwelling would have had originally.
- Reinstatement of the stair in its historic location.

It is important to note:

- There is no existing lift provision in the property and it is not possible to achieve it without causing harm to designated heritage assets.

-The layout of the building is driven by historical forms and was recognised as a significant heritage benefit by the local authority's senior conservation officer in writing. Adapting layout to AD M(4) 2 would cause harm to designated heritage assets.

Given the historical norms in-place, the layouts of the upstairs bedrooms and bathroom are quite generous. All bedrooms have clear space of more than 750mm around beds and have wider than 750mm clear access to the windows. The bathroom upstairs also meets the required criteria of clear space in front of the bath, basin and WC to be more than 700x1100mm. This means we are compliant with the room size requirements as set out in AD M4(2)

The NPPF clauses set out above state that there should be a presumption in favour of the conservation of designated heritage assets and the more significant the designated heritage asset the greater the presumption in favour of its conservation should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting.

## **Conclusion**

This statement provides a clear indication that all the access requirements as defined in the AD M4(2) have been carefully considered against the heritage and conservation constraints present on the application site. Each aspect of accessing, entering and utilising the space inside the dwelling has been looked into during the design process.

Given the heritage constraints present onsite we find that we are in-line with the requirements of Local Plan Policy LP35 section E where possible. Where it is reasonably not possible, we believe that 31 The Green must be exempt on heritage grounds and the aforementioned clauses of the NPPF.