Accessibility Report

1 Palace Gate, Hampton Court

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1. Foreword

- 1.1. This report has been produced by Jane Simpson RIBA, NRAC. Jane is an Architect and Access Consultant director of Jane Simpson Access Ltd (JSA) with over 30 years experience in inclusive design.
- 1.2. Jane is an Access Consultant on the National Register of Access Consultants (NRAC) and was a board member from 2010 2016. The NRAC was established with Government backing to provide a single source for organisations seeking competent advice in relation to inclusive environments and accessibility. As an NRAC consultant we always advise in relation to regulations but crucially the implications of the Equality Act.
- 1.3. Jane has extensive heritage knowledge having worked within a conservation planning department and working on notable access schemes in heritage buildings including Manchester Town Hall Grade 1 £300m refurbishment, evacuation advice House of Lords, Russell Hotel (now the Kimpton Fitzroy) and Lansdowne Club, Mayfair.
- 1.4. This report is in response to point 14, request for an accessibility statement with regard to Policy E10 of the London Plan and point 18 providing said statement, to ensure that the development provides facilities for its users.
- 1.5. As the London Plan and the Accessible London: achieving an inclusive environment SPG indicates, ensuring an inclusive environment is essential, so that all of London's diverse communities can contribute to and enjoy a high quality of life.
- 1.6. Policy E10 of the London Plan recognises that accessible rooms in serviced accommodation are in short supply and welcomes accessible provision. The policy requires development proposals to provide 10% accessible rooms as per Figure 30 in BS8300:2 or point 19.2.1.2 which requires a number of rooms to be installed and the capacity to future proof with a potential of 15% accessible.

2. Introduction

- 2.1. This report has been produced following a site meeting on the 2nd of September 2024 alongside Hector Ross, & David Kelly Mitre Hampton Court Hotel (MHCH) and Maiia Williams, Architect.
- 2.2. Ms Simpson attended site and assessed both 1 Palace Gate and the MHCH with regard to inclusivity. The site visit included not only reviewing 1 Palace Gate but obtaining an understanding of the various facilities that may be used by hotel guests and any other functions within the hotel. This was not limited to physical elements but also operational and managerial policies.

- 2.3. A meeting was held to discuss their expectations for inclusivity, and it was clear that as an organisation they are supportive of and wish to provide accessible accommodation. The existing rooms were completed to aid their accessibility.
- 2.4. Planning permission was sought for 1 Palace Gate which provided four additional rooms for the MHCH.
- 2.5. The MHCH dates from 1665, is Grade II listed and is prominent in its position being opposite Hampton Court Palace. The existing hotel has numerous changes in levels which restricts its accessibility.
- 2.6. There are currently, including 32 rooms in the main MHCH and four in 1 Palace Gate, a total of 36 rooms.
- 2.7. The site visit was conducted on a sequential route basis.
- 2.8. This report is written considering the anticipated obligations of the Equality legislation and the London Plan, specifically, Policy D5. But accepting that it is to be balanced with the practicality of accessibility whilst looking for improvements within an historic structure.

3. Findings

- 3.1. The new rooms within 1 Palace Gate as the Appeal Decision Notice noted, it would be difficult to make accessible as point 13 states, find that there is a high likelihood that the interventions required to make the rooms wheelchair accessible would cause harm to the listed building's special interest. We concur and find that the stairs are steep, not meeting current regulations and there is not a viable location for a platform lift to be installed.
- 3.2. In the MHCH there are currently two accessible rooms, one with a bath and the other a level access shower. There are a further two which have the potential, without major works, to become accessible rooms.
- 3.3. There are no installed hoists, but one room provides a bed with the capacity to use a mobile hoist. Given the historic structure further investigation would be required to establish the capacity in this hotel.
- 3.4. The accessible rooms are also considerably larger than the ADM requirement, providing ample room for manoeuvrability. Another benefit is the associated space containing two bunk beds. This provides an accessible family room which is rare; disabled guests are often separated from their partner and children. This is also a benefit for those with carers who welcome the separation and privacy.
- 3.5. There are a number of small failings within these rooms. These have been explained to the management and measures are being put in place to maximise inclusivity. See advice points below.

- 3.6. The major barrier to inclusivity is the multiple levels within the hotel. There is a lift situated within the centre of the hotel which provides access to a number of floors, specifically the accessible rooms, see attached plan Appendix A. There are then several small sets of steps (3 or 4 risers) within the hotel which restrict access to wheelchair users. However, the lift allows those with mobility impairments access to the majority of rooms with limited steps.
- 3.7. Furthermore, the hotel has made other commitments to inclusivity, for example, there are portable vibrating pillows available for hearing impaired guests and an accessible toilet associated with the restaurant adjacent to the lift has been provided.
- 3.8. There are a number of facilities that guests access including a restaurant, bar, terrace and pamper room; the pamper room offers an in-room service, level access to the restaurant and bar areas are provided via temporary ramps. Noting that the accessible rooms are at the lower level with level access onto a terrace; room service is also provided.
- 3.9. Parking at the front of the hotel is managed and guests can book spaces, where accessible bays are required two spaces would be reserved providing ample room. The pavement and car parking area are owned by Richmond Upon Thames whilst managed by the hotel, works to upgrade this area would need to be undertaken and agreed with the council.
- 3.10. Currently access to the reception desk is only via a set of steps and further steps to access the lift. Arrival and departure are managed by the hotel. Guests are greeted as they arrive and access the hotel via a ramp down to the lower level.
- 3.11. Staff are trained in the importance of providing equity and respect for all guests.
- 3.12. The maintenance regime highlights where repairs would be required and are dealt with swiftly by on-site staff.

4. Advice

- 4.1. During the visit we undertook an assessment of the facilities provided and advised the manager on ways in which to improve access.
- 4.2. We established contact with Visit England and directed the hotel to the toolkit. The Visit England toolkit has been produced enabling visitor attractions to review their services and premises, the hotel will use this to continue to improve, monitor and manage access.
- 4.3. We recommended improvements to the website, highlighting, (pre arrival) the available accessible facilities, booking procedures and establishing communication.

- 4.4. We identified potential short, medium and long-term improvements. Given the listed status a number of more substantial improvements may require listed building consent and/or agreement from Richmond-upon-Thames highways.
- 4.5. Solutions have been proposed to the hotel specifically to provide independent access to some elements and to create a further two accessible rooms. There are also a further three rooms on the ground floor which provide sufficient space to accommodate accessible facilities, with level access and are suitable for conversion.

5. Accessibility Strategy

- 5.1. There are a number of small interventions which we identified that the hotel could implement to improve accessibility, they are currently exploring these. For example:
 - 5.1.1. Ensuring handrails are provided to both sides of stairs.
 - 5.1.2. Purchasing mechanical equipment to improve access and egress in the short term. Whilst investigating longer-term permanent solutions.
 - 5.1.3. Providing portable equipment for those who may require support in standard rooms.
 - 5.1.4. Providing an adjustable bed with space below for portable hoist use.
 - 5.1.5. Amending wardrobes to provide accessible rails and fittings.
 - 5.1.6. Adaptation of two rooms (identified during the site visit) to provide four accessible rooms, works to the bathrooms required.

6. Conclusion

- 6.1. It is anticipated that within any existing historic building, there will be elements which fall below current regulations and best practice standards.

 There will always be some limitations in this hotel, however, part of the charm is enabling all people to experience the historic and idiosyncrasies of this hotel.
- 6.2. Given that the original application related to the provision of four new hotel rooms and that there are currently two large accessible rooms, with the potential and commitment to provide a further two accessible rooms, this would meet the 10% rooms requirement in this hotel.
- 6.3. It is clear from the voluntarily provided accessible facilities that the Mitre Hampton Court Hotel (MHCH) is committed to providing accessible facilities and wishes to continue doing so. This is supplemented by the management of the facilities, whose aim is to make all guests feel equally welcome.

- 6.4. To have such a wonderful historic hotel with accessible rooms and facilities should be applauded. We are looking forward to seeing this develop and providing luxury accessible facilities.
- 6.5. This testimonial explains the hotels approach.

My family and I often stay at The Mitre at Hampton Court as the facilities work well for me as a wheelchair user / all of us. I can easily get from the car to our bedroom. The room has good access, a well-laid-out bathroom, and a large well-furnished bathroom. I can access the 2 restaurants. Our favourite bedroom is Rm 101 as it has a king-size bed as well as bunk beds for the kids!

Jason Phillips

Appendix A



