

Former Victoria House Care Home
2-4 Ennerdale Road

TW9 3PG

This is an '**Inclusive Access Statement**' for compliance with the relevant Building Regulations prepared by Michael Jones Architects for the planning application for 2-4 Ennerdale Road, TW9 3PG.

Introduction:

New dwellings created through change of use in the London Borough of Richmond Upon Thames are required to address Building Regulations Requirement M4 (2) 'accessible and adaptable dwellings'. Where reasonably possible within the heritage constraints of the Buildings of Townscape Merit and Kew Gardens Conservation Area, we have made sure that the proposal meets the requirements of this legislation.

Relevant Policies:

NPPF:

National Planning Policy Framework sets out the Government's planning policies for England and how these should be applied, providing a framework within which locally-prepared plans can provide sufficient housing and other development in a sustainable manner. It states the planning system should contribute to achieving sustainable development, including the provision of homes and commercial development. The document also highlights the importance of protecting Heritage Assets.

London Plan Policy:

The London Plan 2021 Policy D5 Inclusive Design (part B) states that development proposals should achieve the highest standards of accessible and inclusive design and that they should be able to be entered, used and exited safely, easily and with dignity for all.

Following the Government's Housing Standards Review (2015) new 'optional' building regulations for accessible housing were introduced. These standards are 'optional' in so far as the requirement for them has to be set out in the development plan. They are contained within Approved Document M Volume 1 of the Building Regulations 2 and are known as: M4(2) Category 2: Accessible and Adaptable Dwellings.

Local Policy:

Richmond Local Plan 2018 - policy LP 35 E.

Richmond SPD Development Management Plan 2011 - policy DM HO 1 and DM HO 7.

Richmond SPD Residential Development Standards 2010 - policy 4.2.2 and 4.2.7

Justifications:

The application site contains two Buildings of Townscape Merit (BTMs) and is located within the Kew Gardens Conservation Area. The project proposes to revert the site of a former care home, previously Victorian Villas, into 7 single-family dwellings. Additionally, demolition of ancillary buildings, external restoration, and enhancement works are proposed, to improve the street scene and enhance the heritage significance of the building. These are quantifiable improvements in terms of heritage conservation. A further two new semi-detached villas are proposed on the site.

The NPPF states 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. Certain adjustments to the building for inclusive access may cause harm to the significance of the heritage asset and surrounding conservation area. Emphasis therefore has been on making the new-build units, and converted modern buildings, fully compliant, and making sensitive alterations to the original buildings, where possible.

This document has been produced with reference to the Approved Document M4(2) and highlights the key relevant areas. The following points should be read in conjunction with the proposed floor plans: 2041.03.03.Pln01.022-24



Fig. 0: Proposed Site Plan

ENTRANCES:

Plots 3-6 within existing buildings

Provision of step-free access to the properties within plots 3-6 would remove the original ornate porches from both Building of Townscape Merit, and adversely impact the historic stone steps leading to the front doors. This would cause harm to both BTM and the conservation area, we are proposing to restore these porches and stone steps in favour of the heritage benefits brought forward with this scheme.

(Exempt - Heritage Asset)

Where a porch is being added to plot 7, step-free access can be achieved without impact to a heritage asset, given the later age of the building on this plot. (Compliant).

Plots 1-2 (newbuild dwellings and existing not a designated BTM)

Where two new semi-detached villas are proposed on the same site, step-free access and a flush threshold are proposed both to the front and side. The proposed porch to the front of the property, in order to replicate that of the neighbouring BTMs, and other buildings within the conservation area, cannot provide an external landing with a minimum depth of 1200mm. Fully compliant access is therefore provided by the side entrance, making both units compliant. Both front and side front entrances benefit from a canopy 1200mm by 900mm compliant with M4(2). (Compliant).

Nevertheless, the designs are compliant with other requirements in terms of principal entrance doors and all others 850mm clear opening; 900mm wide approach route. (Compliant)

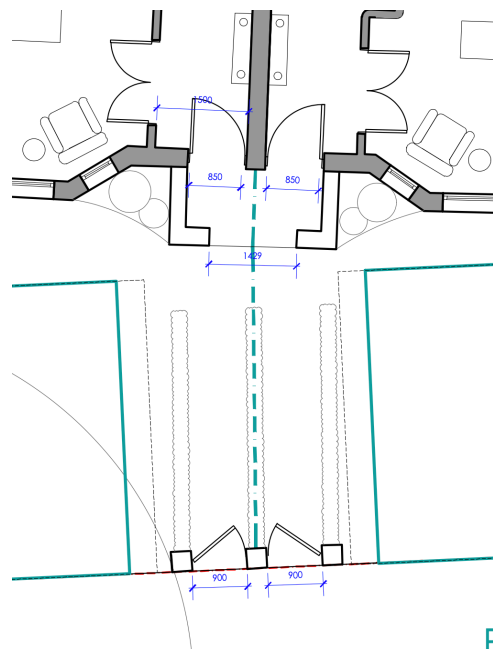


Fig 1A: Front Entrances

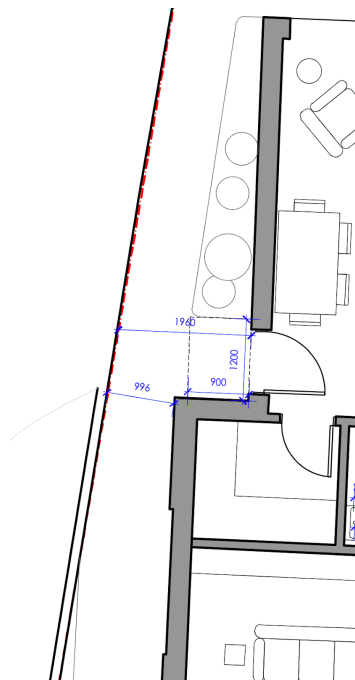


Fig. 1B.Example side Entrance (Plot 1)

Fig. 1 : Extracts from drawing 2041.03.03.Pl01.022 demonstrating compliance with Approved Document Part M4(1) Section 1B: Private entrances and spaces within the dwelling with flush threshold.

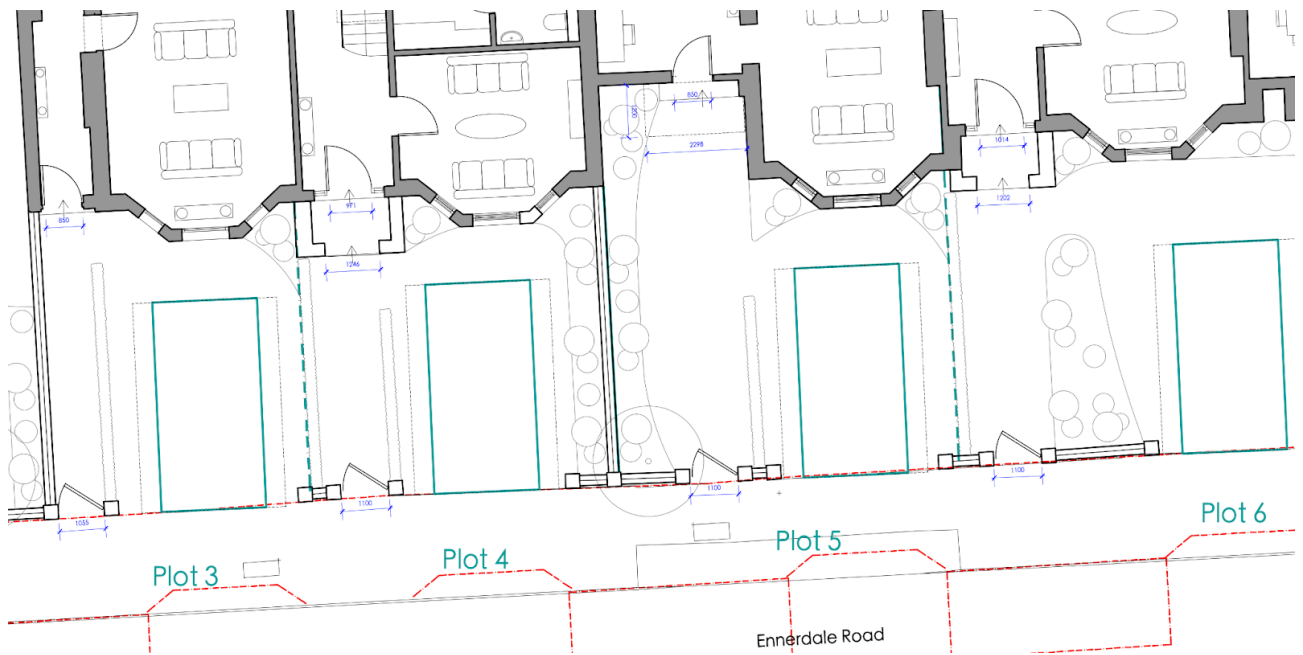


Fig. 2: Extract from drawing 2041.03.03.Pln01.022 demonstrating compliance with Approved Document Part M4 Section 1B: Private entrances and spaces within the dwelling, except step-free threshold given building status as heritage asset.

The canopy over the entrance is more than 900mm wide and 600mm deep on plots 1,2, 4, 5, 6 and 7. On plot 3 a canopy could not be implemented without harm to the heritage asset and/or negative impact on the streetscape. (Compliant/Exempt)

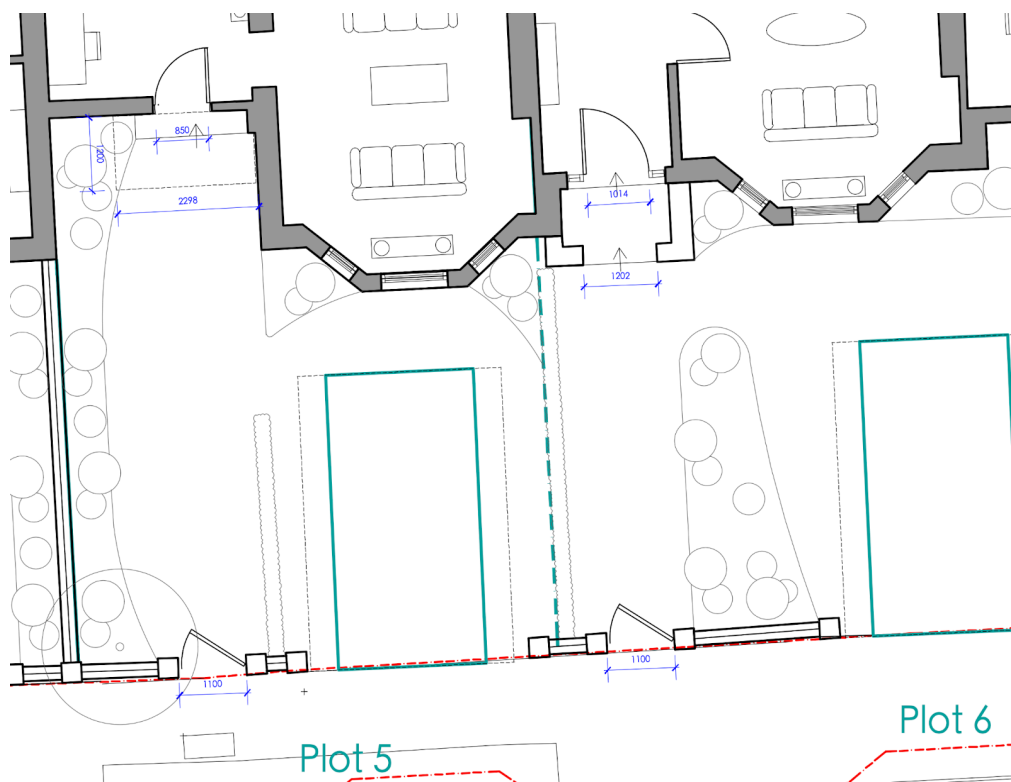


Fig. 3: Example showing the existing covered entrance porch and historic front door to plot 6 and proposed new entrance to plot 5, with dimensions. A similar arrangement is provided on all plots except plot 3. Extract from drawing 2041.03.03.Pln01.022.

Low-level motion-detecting lighting in the entrance portal will be provided. (Compliant)

PARKING:

All parking spaces across the site will exceed the minimum 2.4x4.8m dimensions and within the space available, all spaces can be widened to 3.3m. None will slope more than the gradient of 1:60. (Compliant)

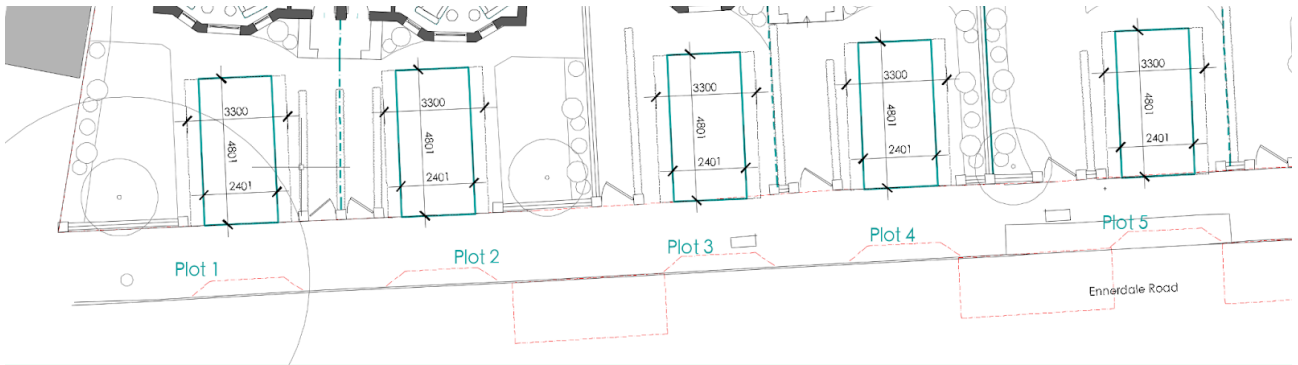


Fig. 4: Extract from drawing 2041.03.03.Pln01.022 demonstrating compliance with Approved Document Part M4 plots 1-5.

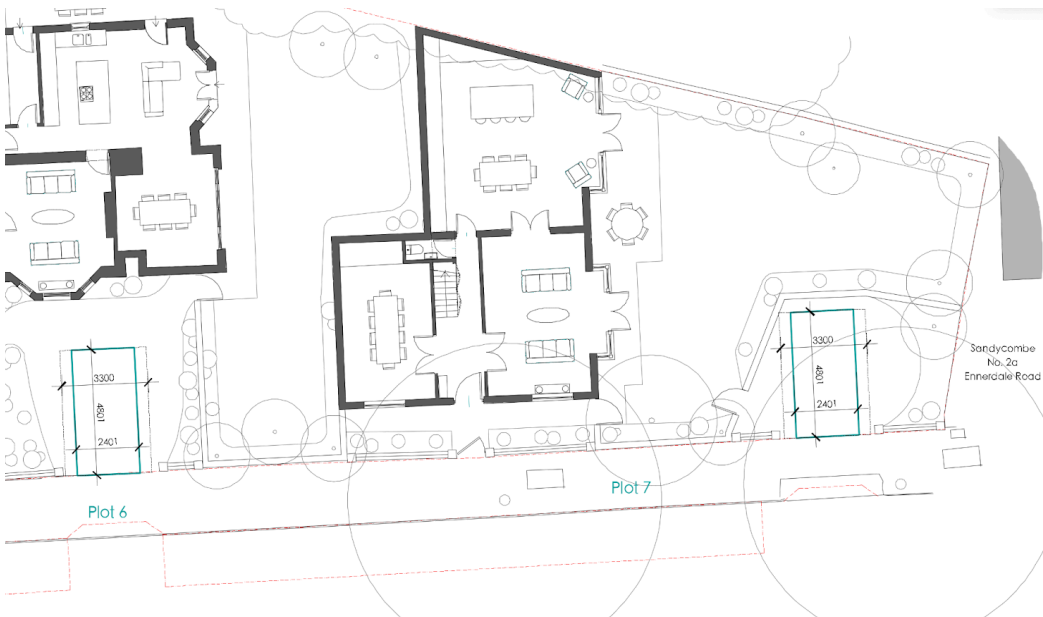


Fig. 5: Extract from drawing 2041.03.03.Pln01.022 demonstrating compliance with Approved Document Part M4 plots 6-7.

CIRCULATION:

A minimum nib of 300mm is provided to the leading edge of all internal doors. Within the entrance storey (ground floor) all the rooms are accessed step-free. (Compliant)

There are a few exceptions within the BTMs, where original doors and positions are proposed to be retained to protect this heritage asset. (Exempt)

All the corridors/hallways have an unobstructed clear width in excess of 900mm.

A living Room is provided on the entrance storey, all the living spaces are located on the entrance storey in each dwelling, see fig 4 and 5. (Compliant)

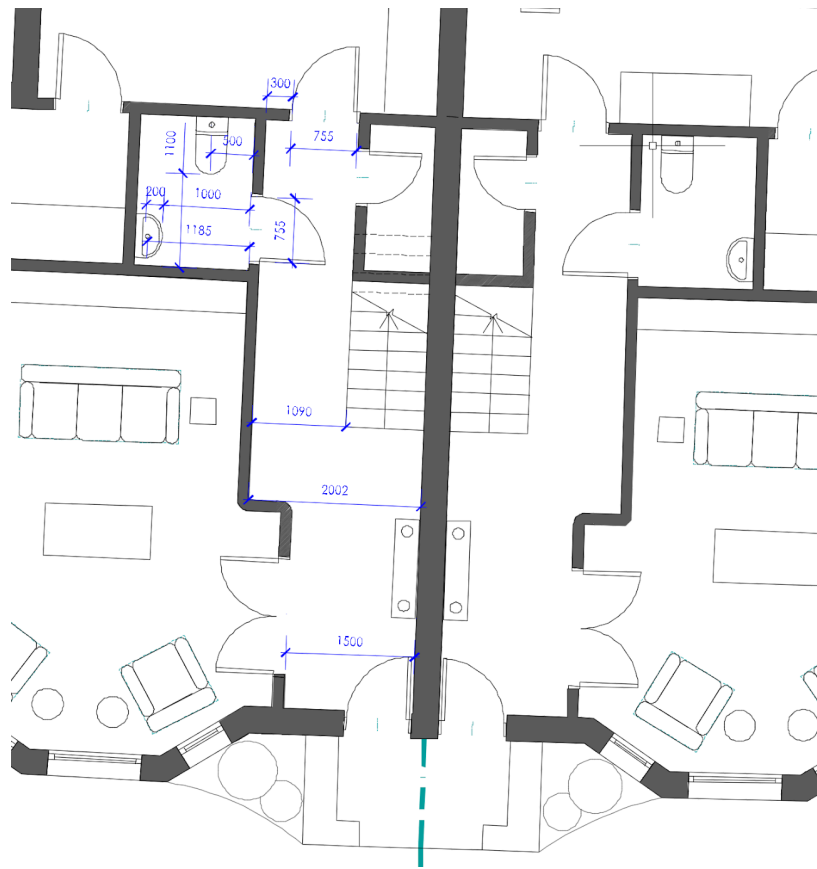


Fig. 6: Sample plan of the proposed upper ground floor circulation space, min 1090 mm wide. Extract from drawing 2041.03.03.Plh01.022.

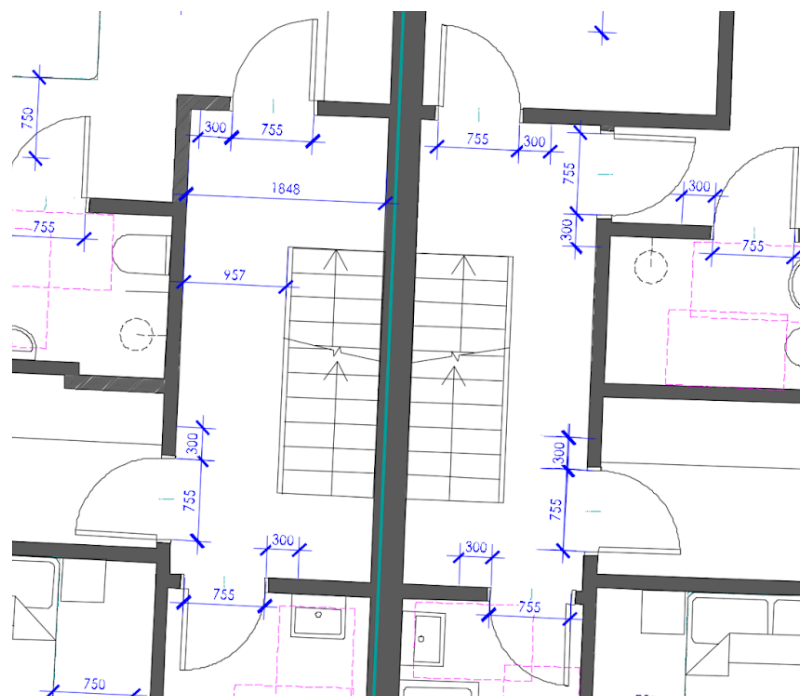


Fig. 7: Sample plan of the proposed first floor circulation space, min 1848mm wide. Extract from drawing 2041.03.03.Plh01.022.

Where original rooms and staircases remain within the BTMs these will be retained as heritage assets.
(Compliant/Exempt)

BEDROOMS:

All bedrooms are adequately sized and provide at least 750mm access around the bed as well as unobstructed access to the window. (Compliant)



Fig. 8: Plots 1 and 2 proposed first floor circulation space, min 1848 mm wide. Proposed plans of all bedrooms with dimensions showing minimum clear space around the bed. Extract from drawing 2041.03.03.Pln01.023.

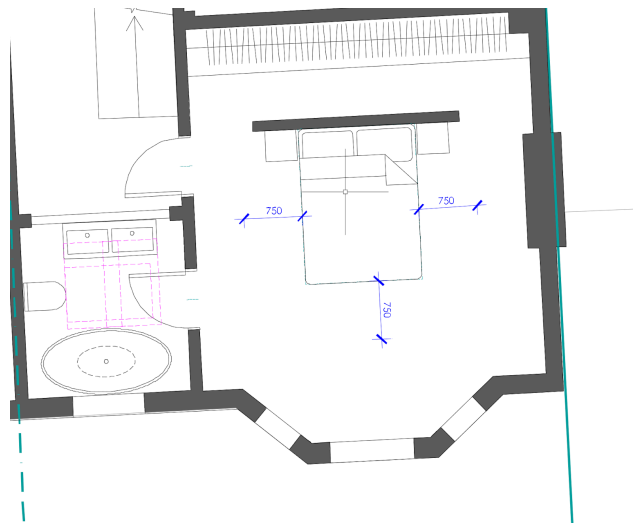


Fig. 9: Sample plan of the proposed first-floor bedrooms within plots 3-6. Extract from drawing 2041.03.03.Pln01.023.

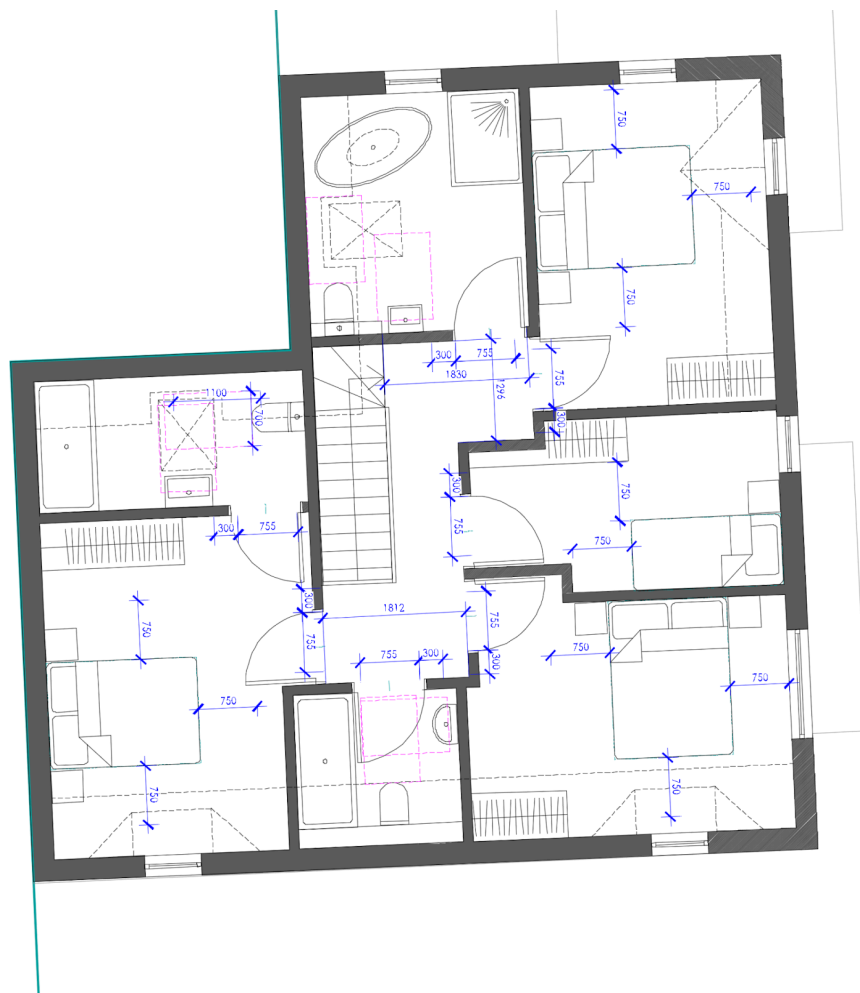


Fig. 10: Plot 7 proposed first-floor circulation space, 1812 mm wide. Proposed plans of all bedrooms with dimensions showing minimum clear space around the bed. Extract from drawing 2041.03.03.Pln01.023.

The grand proportions of the existing BTMs ensure the 750mm requirement surrounding beds can be complied with across the board, meeting requirements whilst having no negative impact on the heritage assets.
(Compliant)

WC PROVISION:

There is a requirement for a WC within the entrance storey of all units capable of taking a future level-access shower.

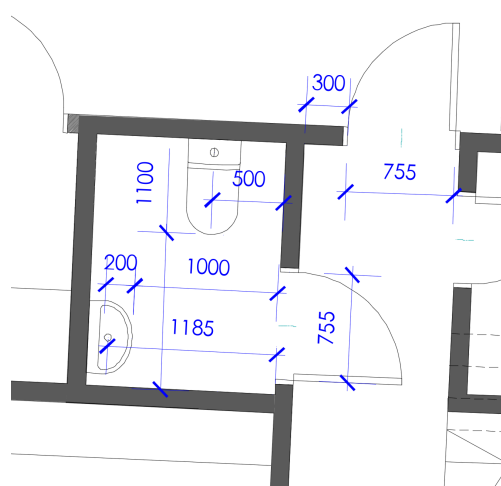


Fig. 10: Sample plan of the proposed entrance level WC compliant with m4(2) Plots 1 & 2.

The proposed dwellings have a WC on the ground floor (entrance storey) dimensions of which are shown above in line with M4 (2). (Compliant)

BATHROOMS.

Within both proposed new builds (plots 1 and 2) and the reuse of plot 7 all bathrooms meet the requirements set out in approved document M 4(2). (Compliant)

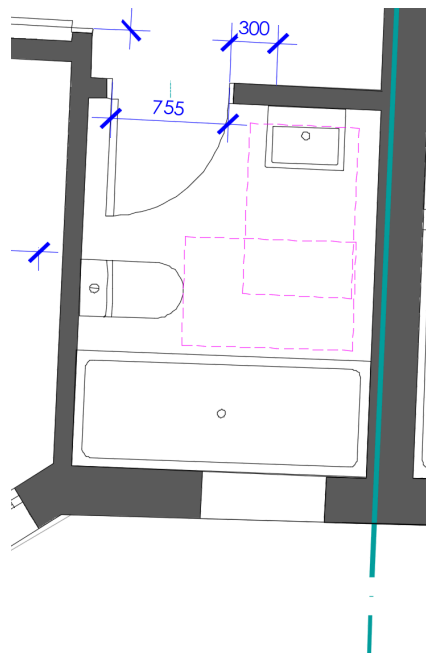


Fig. 11: Sample plan of a proposed bathroom within Plots 1 & 2.

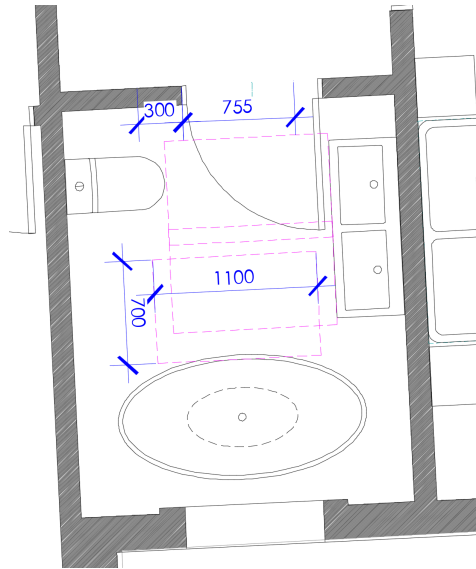


Fig. 12: Sample plan of a proposed bathroom within BTM Plots 3-6

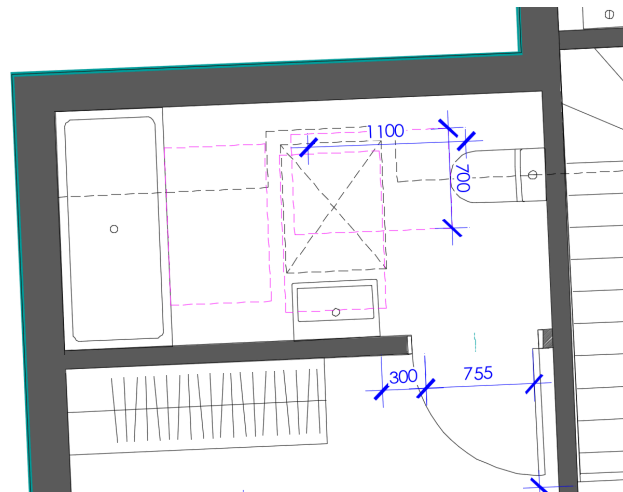


Fig. 13: Sample plan of a proposed bathroom within Plots 7

All bathrooms on the same floor as bedrooms have 1,100mm x 700mm clear access zones in front of the WC and basin and to the side of a bath. (Compliant)

Conclusion:

The proposal to revert the former residential care home into single-family dwellings is largely compliant with the building regulations Part M4 (2) requirement 'Accessible and Adaptable Dwellings' There are a few areas where it is not possible to be fully compliant without harm to the designated heritage assets. Since 2 & 4 Ennerdale Road are Buildings of Townscape Merit, within the Kew Gardens Conservation Area, the preservation of its heritage significance and heritage assets is to be favoured over the need for inclusive access. Nevertheless, we have made sure that the buildings are meeting the criteria for inclusive access wherever it is reasonably possible.