



Access Audit

Common parts of Petticoat Square
Artizan Street
London

Prepared on Behalf of
City of London

Ref: 16184

Date: 26th January 2022

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A Executive Summary

- A1 As a residential landlord you have very limited obligations to make any form of physical adjustment under the Equality Act thus our recommendations should be seen as advisory only.
- A2 This being said as a public body you do have an obligation to promote disability equality and thus, at the very least we suggest that our recommendations are incorporated into your longer term maintenance and refurbishment plans in order that accessibility is gradually improved over time.
- A3 The site is generally relatively accessible although we would highlight the following items which are likely to pose a significant barrier to access by a disabled user; heavy entrance doors; means of escape provisions to lower levels.

B Introduction & Methodology

B1 Brief & Aims of Report

- B1.1 The following report is an assessment of the common parts of Petticoat Square against the criteria set out in Section B3 below.
- B1.2 The purpose of this report is to assess these areas and identify barriers to access by disabled users.
- B1.3 In order to achieve this the report will identify where the property does not meet current best practice standards and will recommend ways to overcome these issues which may incorporate adjustive works, changes to management policies and procedures or a combination of the two.

B2 Legislation

- B2.1 As a Public Body the Disability Equality duty will apply to all of your functions including this property.
- B2.2 Sections 3 and 5 of the Act will have limited application to this property. Section 4 is the most relevant which we cover under Section D below.

Part 3 - Service Provision

- B2.3 This section relates to service provision to members of the public.

- B2.4 Under this section it is illegal to discriminate against a disabled person and the service provider is obliged to make reasonable adjustments to make their service accessible to members of the public. These may include physical adjustments or adjustments to policies, practices or procedures to overcome barriers to access.
- B2.5 This is a proactive duty so the service provider is obliged to anticipate the service of a disabled person and make adjustments in advance.
- B2.6 As you have confirmed that there is no public access to this site this will not generally apply other than to the perimeter. See Section D for more clarification.

Part 5 - Employment

- B2.7 As an employer it is illegal to discriminate against a disabled people in terms of employment, which may involve making reasonable adjustments to policies, practices or procedures or physical alterations to premises.
- B2.8 This is a reactive duty. There is no obligation to take anticipatory steps to make a site accessible but rather to make reasonable adjustments for the individual disabled person.
- B2.9 This being said, it is prudent to incorporate accessibility into any refurbishment of staff areas.
- B2.10 As landlord this can only relate to your own employees.
- B2.11 Where a tenant employs a disabled person it will be the tenant's responsibility to make reasonable adjustments for that person.

Section 149 - Equality Duty

- B2.12 As a public body you are also obliged to eliminate unlawful discrimination, promote equality and to foster good relations between disabled and non-disabled people.
- B2.13 This applies to everything you do including the way you deliver your services using your buildings and how you manage your buildings generally.
- B2.14 The findings of our audit and in particular the prioritisation of recommendations should be reviewed against your own Equality Policy and how it relates to buildings.
- B2.15 As an example it may be that, depending on your policy, you choose to bring forward recommendations which, through your duties under other sections of the Act we have categorised as longer term priorities.

B3 Criteria

- B3.1 The following documents have been used as the criteria against which the premises will be audited.

- Equality Act 2010 (Replaces Disability Discrimination Acts 1995 & 2005)
- Equality Act 2010- Code of Practice on Services, Public Functions and Associations (2011 edition).
- BS8300-1-2018 -Design of an accessible inclusive built environment - Part 1 External Environment Code of Practice
- BS8300-2-2018 - Design of an accessible inclusive built environment - Part 2 Buildings Code of Practice
- The Building Act 1984, Approved Document M 2015 Edition Volume 2 - Access to and use of buildings, volume 2: buildings other than dwellings
- BS9999:2017 Code of Practice for fire safety in the design, management and use of buildings.
- The Building Act 1984, Approved Document M 2015 Edition Volume 1 - Access to and use of buildings, volume 1: dwellings.
- Revised Lifetime Homes Standard - Published 5 July 2010 by Habinteg
- Wheelchair Housing Design Guide - Third Edition Published by Habinteg

B3.2 All recommendations made in this report shall, as far as possible meet the guidance set down in the criteria documents. However, due consideration will be given as to whether the alterations are "reasonable" as set out in the Act and the Codes of Practice arising from it.

B4 Scope

B4.1 This report is limited to those areas within the Landlord's demise. It does not examine areas within a Tenant's demise but rather those common areas giving access to a Tenant's facilities, i.e. car parks, reception, lifts, stairs etc.

B4.2 Those areas within a Tenant's demise will, quite rightly, be the Tenants own responsibility in terms of accessibility and so are not covered by this audit.

B4.3 Although we have included the Code of Practice for Means of Escape for Disabled People within our criteria this report should not be considered as a detailed assessment of the overall means of escape provision, which should be included in the Emergency Evacuation Plan.

B4.4 Plant rooms, workshops, stores and machinery rooms are excluded from our inspection as is the Library space and all residences.

B5 How to Use this Audit

B5.1 Section D sets out our approach to the audit and outlines the relevant legislation. This forms the basis of our report and puts our findings into context, it is important that this is read and absorbed prior to considering our findings within Section E.

B5.2 The Audit findings list our recommendations in short form with each allocated a priority rating and cost banding/budget cost. These recommendations should form

the basis of your programme of adjustive works, Access Action Plan or Accessibility Plan.

B5.3 These recommendations are supported by more detailed discussion under the heading 'Issue' to:

1. explain why a recommendation has been made
2. justify why no action has been taken where a problem exists
3. give the reader an insight into the problems disabled people face in accessing the site
4. provide more detail and further guidance as to how the recommendations should be implemented

B5.4 In order to gain a full understanding of our recommendations Section E should be read in detail.

B6 Taking Action on the Results

B6.1 This audit should be seen as the first step towards making the property more accessible to its disabled users. If no action is taken on the results you will be discriminating against disabled users and consequently will be at increased risk of claims for compensation.

B6.2 The recommendations of this audit have been prioritised and allocated costs in order to allow you to form a long-term strategy for their implementation. This strategy should then be integrated into your current maintenance, refurbishment and capital works programmes.

B6.3 By doing this you will avoid compromising the recommendations of the report with maintenance, refurbishment or capital projects and therefore are likely to save money by avoiding costly mistakes which may require rectification at a later date.

B7 Statutory Consents

B7.1 Unless informed otherwise we have assumed that the site has no particular restrictions on development other than the usual Planning and Building Regulation requirements.

B7.2 Where you choose to implement the work outlined in our report we recommend that you take further advice as to the application of Planning or Building Regulations prior to proceeding.

B7.3 As Surveyors and Planning Consultants Evans Jones can offer this advice as a separate service. Alternatively we recommend that you contact a Chartered Surveyor (RICS), Planning Consultant (MRTPI) or Architect (RIBA) for this advice.

B7.4 Evans Jones Ltd accept no liability where you proceed with works without seeking such advice.

B8 Alternative Format

B8.1 Copies of this report are available in alternative formats upon request.

B8.2 Please contact us to discuss your individual requirements.

C The Site

Address: Common parts of Petticoat Square
Artizan Street
London



Date: 26th January 2022

Contact: Matthew Ring

Location: The site is set in a town centre and thus is generally surrounded by a variety of properties.

Given the location and usage of the site we find it likely that users will arrive here by all modes of transport.

Conditions: The weather at the time of our inspection was fine and bright with no rain. It was cold.

Our inspection was carried out during daylight hours.

The site was in use at the time of our inspection but we had unrestricted access to all relevant areas.

D Context of Site and Approach to Audit

D1 Ownership

We assume the City of London retain the freehold and are responsible for the maintenance of the common parts and services to include the podium courtyard and car parking areas.

You have confirmed that this is truly a private estate with no access for members of the public.

D2 How the Equality Act applies to the site

As this site is not open to members of the public we do not consider that the City of London are providing services to members of the public in their maintenance of the common parts of the site and thus we do not generally consider that Section 3 of the Equality Act will apply.

Based on what you have told us we consider that the more relevant section of the Act is Part 4, which relates to the disposal and management of premises.

As far as we can tell the relationship between the City of London and the residents is that of Landlord/Managing Agent and Tenant/Leaseholder, rather than that of service provider and member of the public.

We do not consider tradesmen and delivery drivers to be members of the public for the purposes of the Act and neither do we consider visitors to individual tenants to be so.

In our opinion Part 4 of the Act is clearly designed to govern the relationship between the City of London and its residents rather than the accessibility of the building itself.

D3 General Requirements of Part 4 (Premises) Provisions of the Equality Act

In general terms Part 4 of the Act makes it unlawful for those responsible for the disposal or management of premises to discriminate against disabled residents for reasons relating to their disability.

In addition it does call on responsible bodies to make reasonable adjustments to the terms on which premises are let and the policies, practices and procedures relating to the disposal or management of premises.

Equally there are limited obligations to make reasonable adjustments or to provide auxiliary aids, noting these obligations are far less onerous than those under Section 3 of the Act.

Under Part 4 tenants do have the right to request adjustments to terms or the provision of limited auxiliary aids to their own residences.

D4 What is unlawful conduct under the Act?

Sections 35 and 36 both cover management of premises and make it very clear that both landlords and managing agents are “duty holders” under Part 4 of the Act.

As a duty holder it is unlawful for the City of London (hereafter referred to as CoL) to discriminate against or victimise a disabled person for reasons relating to their disability.

Examples of such discrimination or victimisation could involve offering the premises on less favourable terms, by refusing to let or sell the premises or by less favourable treatment generally.

D5 The Requirement to Make Reasonable Adjustments

Unlike Section 3 of the Act there is no proactive duty for CoL to make reasonable adjustments.

Under Section 4 the duty to make reasonable adjustments is activated by the request of an existing or prospective tenant or leaseholder.

The Act makes it clear that it will never be reasonable for the duty holder to make an adjustment which involves the removal or alteration of a physical feature, i.e. there is no obligation to make physical alterations.

However, the Act makes it clear that furniture, furnishings, materials and equipment are not physical features for the purposes of the Act and also confirms that the following works will not be considered to be an “alteration of a physical feature”:

- * The replacement or provision of a sign or notice.
- * The replacement of a tap or door handle.
- * The replacement, provision or adaptation of a door bell or door entry system.
- * Changes to the colour of a wall, door or any other surface.

Thus CoL have no obligation to make proactive alterations to the site generally, save for some very limited alterations as set out above which, in turn, are reactive duties activated by the request of a tenant.

However, the obligation to make reasonable adjustments to policies, practices and procedures as well as the terms of a tenancy agreement should not be underestimated.

D6 Tenants Right to Adapt Their Own Premises

Any tenant can request consent for work necessary for the accommodation, welfare or employment of a disabled person.

A landlord cannot reasonably withhold consent and, if the landlord does not

respond within one month, he is automatically deemed to have consented.

The landlord can apply reasonable conditions to any such consent, such as provisions for reinstatement at the end of the term or on vacation.

All costs arising will generally be met by the tenant.

D7 Tenant's Rights to Alter Common Parts

CoL has no obligation to make alterations to common parts.

Whilst there is provision within Schedule 4 of the Act to allow tenants to request alterations to common parts this has yet to be enacted as so does not currently apply.

D8 What Constitutes a Request From a Tenant?

The Act is not clear as to what constitutes "a request" but guidance published by interested bodies such as the Equality and Human Rights Commission suggest that this may be as simple as a verbal request.

We anticipate that CoL should be proactive in their interpretation and when receiving a request, comment or even complaint in any form a disabled tenant should treat this as a request under the Act.

D9 Summary of CoL obligations in respect of Common Parts

As set out previously the relevant section of the Act is Part 4 which relates to the management of premises in this context.

CoL have no obligation to proactively make adjustments to these common parts for disabled users but do have an obligation to make limited minor alterations at the request of a tenant to their residence.

D10 What about CoL obligations as a Public Body

Whilst CoL has very little if any obligation to make physical alterations to the property under Section 4 of the Act this does ignore your duty under Section 149 as a Public Body. This requires you to promote equality in everything that you do including access to your property.

Thus dependant on how CoL intends to meet this duty, and the policy that flows from this you may choose, or be bound by your own policy, to take a more positive approach and aim to upgrade the accessibility of this site and your estate generally.

D11 Noting your limited obligations we have generally given all of our recommendations a longer term priority (3M or 3R) on the basis that works should be incorporated into your longer term maintenance and refurbishment programs.

E Audit Findings

E1 Key to Priority and Cost Bandings

Priorities	Description	Cost Bandings
1	Urgent, low cost or immediate health and safety risk to a disabled user	A £0 - £500
2	As soon as possible (Should not wait til next refurbishment/maintenance cycle)	B £500 - £2500
3M	As part of ongoing maintenance programme	C £2500 - £5000
3R	As part of next refurbishment	D £5000 - £10000
4	When a specific need is identified	E £10000+
EXP	Further specialist advice required	



Photo	Item	Issues	Recommendations	P	£
	1.0	Approach and Car Parking			
	1.1	<p>Our assessment of the approach to the site is limited to those areas within the site boundary and the public highway to the perimeter of the site.</p> <p>We assume CoL are also the highway authority. Certain elements may actually be public access issues cover by Part 3 of the Act and have been prioritised accordingly.</p>			
	1.2	The temporary hoarding serving what we assume is temporary plant is not particularly well contrasted against the paving posing a risk of collision to some visually impaired users.	Apply contrasting markings at base and head level to hoarding	2	A
	1.3	The dropped kerb points to the service entrance and car park ramp has no tactile blister paving fitted and thus there is a risk that visually impaired users will walk into the carriageway unawares.	Fit tactile 'blister' profile paving to crossing points	2	B




Photo	Item	Issues	Recommendations	P	£
	1.4	<p>The dropped kerb point across Artizan Street has no tactile blister paving fitted and thus there is a risk that visually impaired users will walk into the carriageway unawares.</p>	<p>Fit tactile 'blister' profile paving to crossing point</p>	2	A
	1.5	<p>Outdoor seating areas can pose a particular risk of collision to visually impaired person as they tend to be inconsistent with users bags and other items obstructing the pavement.</p> <p>As a result it is good practice to highlight these areas using contrasted paving or by requiring businesses to cordon off with temporary, well contrasted barriers.</p>	<p>Require tenants to cordon off seating areas</p>	2	Zero
					




Photo	Item	Issues	Recommendations	P	£
	1.6	<p>The granite planters are poorly contrasted to their surroundings and thus a visually impaired person will be at risk of collision.</p> <p>Contrasting bands should ideally be applied around the head of the planters. A capping could achieve this but a better alternative may be to simply plant more colourful species.</p>	Improve contrast of planters	2	B
	1.7	<p>Granite setts have been used to delineate and highlight cycle parking areas to Harrow Lane. These will provide a useful clue to visually impaired users but the introduction of a highly contrasted surface would improve this further.</p> <p>This will also apply to Gravel Lane. In this instance parking is well positioned between planters.</p>	Install high contrast surface to cycle parking areas	3M / 3R	B
					




Photo	Item	Issues	Recommendations	P	£
	1.8	<p>Similar to outdoor seating A board signs can pose a risk of collision to visually impaired users.</p> <p>The signs in place during our visit were generally well contrasted and positioned clear of main pedestrian routes but their use should be controlled.</p>	<p>Require A boards to be kept clear of pavements</p>	2	Zero
					
	1.9	<p>City of London bollards have well contrasted markings around the head of each bollard making them easier to identify by a visually impaired person.</p>			

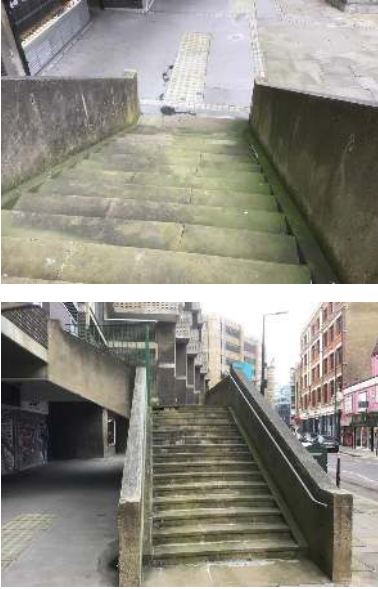

Photo	Item	Issues	Recommendations	P	£
	1.10	<p>The former entrance steps now serve no purpose but the lack of contrasting nosings does pose a trip hazard to a visually impaired user.</p> <p>The lack of handrails will also make the steps more difficult to use by a mobility impaired person.</p> <p>We suggest these steps are blocked off at each end to prevent access.</p>	Block off former entrance steps	2	B
	1.11	<p>Where goods are displayed on street these present a similar hazard to seating as set out previously.</p> <p>In this instance well contrasted barriers to either end would help to mitigate the risk of collision.</p>	Require tenants to use well contrasted cordons to highlight on street trading areas	2	Zero



Photo	Item	Issues	Recommendations	P	£
	1.12	<p>The intercom points at the car park entrances are set around 1400mm above ground level and are not positioned so as to be within reach of a car.</p> <p>As a result a wheelchair user would have to transfer twice to access the intercoms if indeed he or she could reach them.</p>	<p>Lower and move intercoms and fit signs at car park entrances</p>	3R	B
	1.13	<p>We understand that there is no visitor parking within the car park.</p> <p>Flat occupants can rent spaces and it would be appropriate to discuss any individual requirements for these bays with the occupant rather than creating accessible bays in anticipation unless you create wheelchair accessible units in which case we would then suggest creating accessible bays to complement these.</p>			




Photo	Item	Issues	Recommendations	P	£
	1.14	<p>The concrete columns to the car park are poorly contrasted to their surroundings and thus a visually impaired person will be at risk of collision.</p> <p>Contrasting bands of at least 150mm in depth should be applied at 1500mm above ground level.</p>	<p>Apply contrasting markings to concrete columns</p>	3R	A
	1.15	<p>Headroom to the basement car park is less than 2.2m when services are taken into account which would not be sufficient for many roof loading adapted vehicles.</p> <p>You already offer parking at ground floor which is a suitable alternative for a resident with roof loading vehicle.</p>			
	1.16	<p>There is stepped access to core 4. There is plenty of space to break this out and replace the step with a short ramp.</p> <p>We'd suggest you aim to achieve 1:21 which is considered a gentle slope for the purposes of best practice.</p>	<p>Form ramp access to core 4 from car park</p>	3R	B
	1.17	<p>When allocating bays to disabled residents thought should be given to their route to the most preferable entrance with bays allocated as close as possible to the</p>			



Photo	Item	Issues	Recommendations	P	£
		<p>appropriate lift core.</p> <p>This will both limit travel distance and travel along the carriageway areas in what is a potentially hazardous environment.</p>			
	1.18	Lighting levels to the car parks are generally adequate to the carriageway areas.			
	1.19	There is little if any contrast between wall and floor surfaces to the basement car park but given the nature of the environment and likelihood of a visually impaired person being here alone we consider there is little merit in addressing this.			
	2.0	Entrances			



Photo	Item	Issues	Recommendations	P	£
	2.1	<p>Entrance intercom units are not particularly well contrasted against wall surfaces but call buttons are well highlighted against the faceplate with highly contrasted surrounds.</p> <p>This contrast is supplemented with embossed numbering and braille.</p> <p>The intercom units are generally set with buttons no higher than 1275mm above ground level. This is slightly above the comfortable reach range for the average wheelchair user of 1200mm but are within the upper extended reach range of 1400mm.</p>	<p>Improve contrast of intercom units with contrasted frames or faceplates</p>	3R	B
	2.2	<p>The buttons which are most frequently used are losing the contrasted surround.</p>	<p>Replace damaged contrasted rings to call buttons</p>	3M	A
	2.3	<p>The entrance doors achieve a clear width of at least 845mm which exceeds current best practice standards so should be sufficient for all.</p>			


Photo	Item	Issues	Recommendations	P	£
	2.4	<p>The older entrance doors require excessive force to pull open of more than 50Newtons, as a result it will prove difficult for a user with impaired upper body strength to open these doors.</p> <p>Best practice recommends a maximum opening force of 30Newtons for the first 30 degrees of the door swing and 22.5Newtons thereafter.</p> <p>Closers to these doorsets are likely to prove difficult to adjust for what are old and heavy steel doors. It may be necessary to fit new closers.</p> <p>Whilst you have fitted power assistance to no.1, which will be of benefit to all, many disabled users will be able to pull open a well adjusted manual side hung door.</p>	<p>Adjust door closers to achieve maximum 30Newtons opening force</p>	3M	A
	2.5	<p>Lighting to the entrance lobbies is generally around 130-140 lux.</p> <p>Ideally lux levels would be higher in the lobby to limit contrast upon entry. Lux levels in the region of 300 lux would achieve this.</p>			




Photo	Item	Issues	Recommendations	P	£
	2.6	<p>The powered door to the no.1 entrance does not open to the full 90 degrees thus there is a limited risk of collision with the door edge for a visually impaired person.</p>	Adjust closer to open 90 degrees	3M	A
	2.7	<p>Power assisted side hung doors can pose a risk of collision to a visually impaired user.</p> <p>Thus we suggest that the door swing zone is highlighted using a contrasted landing.</p>	Form contrasted landing to door swing zone	3R	A
	2.8	<p>The rear entrance door to no. 1 entrance is poorly manifested making it difficult to identify by a visually impaired user, putting him or her at risk of collision.</p> <p>Manifestation should be solid colour and be set at around 1500mm above floor level.</p>	Apply manifestation to entrance door	3R	A




Photo	Item	Issues	Recommendations	P	£
	2.9	<p>The entrance door handle is also poorly contrasted against the door frame making it difficult to identify by a visually impaired person.</p> <p>New handles should be of a lever, bar or 'D' handle type and aim to achieve a 30 point difference in light reflectance value with the frame. Knob handles should be avoided.</p>	Fit new well contrasted door handle	3R	A
	2.10	<p>Entrances tend to look very similar and we'd suggest some form of colour coding is rolled out when renewing entrance doors or signage to give an additional aid to orientation for a visually or mentally impaired user.</p>	Colour code entrances	3R	Info
	2.11	<p>The ground floor car park entrance door achieves a clear width of only 705mm measured to the panic bar making it difficult to pass by many wheelchair, crutch and frame users.</p> <p>Best practice recommends a clear width of 800mm for new entrance doors.</p> <p>With a standard lever handle fitted the door would then achieve 765mm clear width which is still below standard but should be accessible to many.</p>	Replace panic bar with lever handle	3R	A




Photo	Item	Issues	Recommendations	P	£
	2.12	<p>This door is exceptionally heavy to open requiring up to 80N of force.</p> <p>The ramp to the tower car park entrance is set at a relatively shallow gradient but we do suggest kerbs are installed to either edge to mitigate the risk of a wheelchair user falling off of the opening edge.</p> <p>Whilst handrails are in place there is no guarding at low level.</p>	Install 100mm kerbs to either edge of ramp	3R	A
	2.13	<p>Lighting to the ramp surface is poor with lux levels as low as 30 at the surface making it more difficult for a visually impaired user to identify key features such as the start and finish of the ramp and handrails etc. In this location best practice recommends that a lux level of 100lux is achieved at the ramp surface.</p>	Upgrade lighting to ramp surface to achieve 100lux at ramp surface	3R	A
	2.14	<p>Doors to this entrance appear to be permanently held open.</p> <p>The slave leaf does pose some risk of collision to a visually impaired user but is well contrasted.</p>			

Photo	Item	Issues	Recommendations	P	£
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2.15 The car park ground floor entrance door achieves a clear width of 805mm which exceeds current best practice standards so should be sufficient for all.



2.16 Transitional lighting is poor as one enters the building from the ground floor car park with lux levels as low as 70lux noted in the stairwell.

This could be temporarily disabling to some visually impaired users who may be far more sensitive to contrast than a non-disabled user.

Upgrade lighting upon entry to the building to achieve minimum 100lux

3R A




Photo	Item	Issues	Recommendations	P	£
	2.17	<p>The keypad to the tower stair entrance is poorly contrasted making it difficult to locate by all but particularly a user with a visual or mental impairment.</p> <p>This could be improved by forming a well contrasted frame or surround to the intercom unit or fitting a new well contrasted faceplate.</p>	Improve contrast of keypad	3R	A
	2.18	<p>It is not clear whether the intercoms incorporate inductive couplers which would then transmit audio direct to a users hearing aid.</p> <p>If not in place this should be rolled out when replacing these units.</p>	Fit inductive couplers to intercoms	3R	B
	2.19	Best practice recommends that canopies are fitted over entrances to provide shelter when using the intercom units and door controls.	Fit canopy over tower entrance	3R	B

Photo	Item	Issues	Recommendations	P	£
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3.0 Signage and Wayfinding



3.1	Entrance signs generally achieve good contrast against wall surfaces and do give clear indication of flat locations using a simple font. However some capital text is used thus removing the shape of the word making them more difficult to read by all but particularly someone with a visual or mental impairment.	Fit new signs with sentence case text only and larger number	3R	Info
	They would also benefit from a larger number to make it clearer which entrance one has arrived at.			
3.2	The entrance signs tend to be mounted between 1650 and 1780mm above ground level which is set above average eye level making them more difficult to read by all.	Re-mount entrance signs at 1500mm above ground level to centreline	3R	A




Photo	Item	Issues	Recommendations	P	£
	3.3	<p>Older signage tends to use capital text only thus removing the shape of the word making them more difficult to read by all but particularly someone with a visual or mental impairment.</p> <p>These signs often convey information which is likely of little use to a visually impaired user but should still be replaced in the longer term.</p>	Fit new signs with sentence case text	3R	Info
	3.4	There is no signage to the tower entrance consistent with entrances to the podium units which would be helpful for visitors in particular.	Fit signage to tower entrance	3R	A
	3.5	Lift lobby signs are generally well conceived achieving good contrast against the walls, well contrasted text and a large floor number.			
	3.6	Whilst users will likely be familiar with layout it would present best practice to	Install additional flat number directional signs	3R	B



Photo	Item	Issues	Recommendations	P	£
		install flat number directional signs at each corner or turning point to aid orientation rather than limiting this to lift lobbies.			
	3.7	Whilst occupiers will likely be familiar with the location of their flat this cannot be said of visitors.	Install additional signage to guest flats in core 2 from lift 2 and stair	2	A
		Thus we suggest additional signage is installed to the guest flats in core 2.			
	3.8	Lift cores are poorly signed from the basement and ground floor car parks and whilst residents will likely be familiar with the layout a simple sign over each exit point would be of benefit to all but particularly someone with learning difficulties or a mental impairment.	Install signs over car park exits	3R	B
		To the basement area this should include directional signage on route as this is a particularly confusing space. Colour coding of entrances and signage will again help orientation.			



Photo	Item	Issues	Recommendations	P	£
	3.9	<p>Stencilled floor level signs are used to the tower. These are relatively effective but would be easier to locate by a visually impaired user if mounted on a well contrasted back board but given the likely familiarity of users this is not a high priority.</p> <p>However when replacing finishes or decorating the tower lift lobbies we do suggest you aim to introduce some individuality to make it easier for users to discern which floor they are on such as alternating floor colour by odd and even floor numbers.</p> <p>You have allowed residents to install artwork to some floors which would also provide a useful clue.</p>			
	3.10	<p>At podium level of the tower the stairs do not extend down to the lower floors.</p> <p>We suggest signage is installed here to confirm this and indicate alternative stair access to the lower floors.</p>	<p>Install sign at podium tower core indicating alternative stairs to lower levels</p>	3R	A
	4.0	Lifts			
	4.1	All lifts			




Photo	Item	Issues	Recommendations	P	£
	4.1.1	The lift doors generally achieve a clear width of around 800mm which should be adequate for the majority of users.			
	4.1.2	The control panels could be better contrasted against the lift walls making them more difficult to locate by a visually impaired person.	Fit well contrasted control panels	3R	C
	4.1.3	Buttons are well contrasted with embossed text and braille.			




Photo	Item	Issues	Recommendations	P	£
	4.1.4	<p>The stainless steel finishes to lift cars are not ideal for some visually impaired users but the textured surfaces do help to prevent excess reflection and given that these cars will need to be hard wearing we consider the finishes appropriate in this setting.</p>			
	4.2	Podium			
	4.2.1	<p>Lift call points could be better contrasted against wall surfaces when mounted direct or into stainless steel plate making them difficult to locate by a visually impaired person.</p> <p>Where they are mounted against directory signs they are well contrasted.</p>	<p>Install signage or apply contrasting markings to call points to highlight their position</p>	3R	A

Photo	Item	Issues	Recommendations	P	£
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4.3 1 & 3

4.3.1 The lift cars are 1380mm deep x 1100mm wide which should be adequate for the majority of users.

The dimensions generally meet the minimum requirements of current best practice.



4.4 2 & 4



Photo	Item	Issues	Recommendations	P	£
	4.4.1	<p>The lift cars are around 2065mm deep x 1100mm wide which should be adequate for the majority of users.</p> <p>The dimensions exceed the minimum requirements of current best practice.</p>			
	4.5	Tower			
	4.5.1	<p>The lift cars are 1360mm deep x 1350mm wide which should be adequate for the majority of users.</p> <p>The dimensions generally meet the minimum requirements of current best practice.</p>			
	4.6	<p>Lighting is poor to the tower lift lobbies with many dark spots and lux levels as low as around 70lux noted at floor level generally.</p> <p>This will make it more difficult for visually impaired users to navigate the space and avoid obstacles, obstructions and other users.</p>	<p>Upgrade light levels to achieve 100lux at floor level</p>	3R	C




Photo	Item	Issues	Recommendations	P	£
	4.7	<p>A textured and contrasted vinyl is used to the tower lift thresholds. This may prove a useful clue for a visually impaired user and should be maintained on re-covering and perhaps even extended but take care to avoid very dark colours which may appear as a hole in the floor to some visually and mentally impaired users.</p>			
	5.0	Stairs			
	5.1	<p>The stair nosings achieve adequate contrast where the stairs are clean and well lit but where soiled, in shade or poorly lit they lose their efficacy making it very difficult for a visually impaired person to identify the step edges thus posing a significant trip hazard.</p> <p>Nosings should achieve a 30 point difference in light reflectance value to the treads and risers.</p>	Fit lighter nosings	3R	D

Photo	Item	Issues	Recommendations	P	£
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In the longer term lighter nosings would likely achieve a more sustainable solution.

5.2

It was difficult to assess light levels to the podium stairs as these are generally set externally or in glazed enclosures so, in daylight hours natural light is plentiful.

However given the number, type and position of luminaires and the marginal lux readings taken during our visit we find it unlikely that 100lux will be achieved at the tread throughout making it more difficult for a visually impaired user to identify key features such as step edges and handrails.

Best practice recommends that a lux level of 100lux is achieved at tread level.

Review and install additional luminaires to achieve 100lux at tread to podium stairs

3R

E

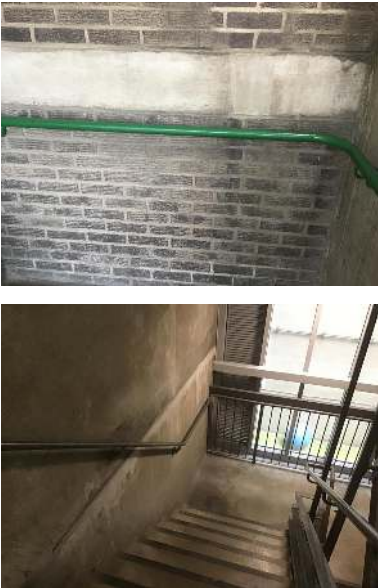
Photo	Item	Issues	Recommendations	P	£
	5.3	<p>Stairs generally have handrails of a suitable profile to either side providing a good means of support for a mobility impaired user and visual clue of the flights.</p> <p>The green colour to the podium and grey to the tower could achieve better tonal contrast against the walls by using a lighter tone.</p> <p>When repainting we'd suggest you consider a different colour to each stair consistent with the colour coding of entrances as set out previously which will give a useful wayfinding clue to a visually or mentally impaired user.</p>	<p>Paint handrails in contrasting colour</p>	3R	Zero
	5.4	<p>Ideally handrails would be warm to the touch as cold rails will prove difficult to grip by some users with sensitive hands such as someone with arthritis but in this setting the low maintenance steel rails do seem appropriate.</p>			

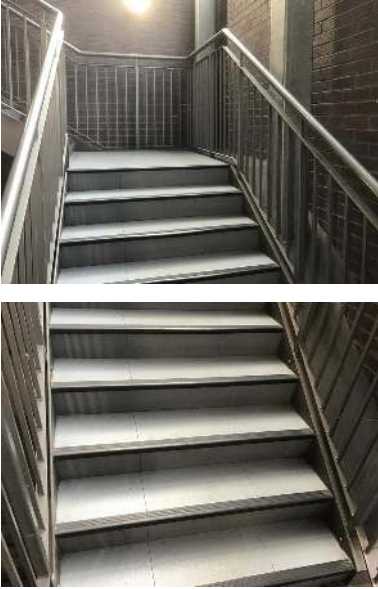

Photo	Item	Issues	Recommendations	P	£
	5.5	<p>The handrails to the base of no. 1 stairs are poorly contrasted to their background making them difficult to identify by a visually impaired person but this lower section does have well contrasted nosings.</p>			
	5.6	<p>The external fire escape stairs are not fitted with contrasting nosings making it very difficult for a visually impaired person to identify the step edges thus posing a significant trip hazard.</p> <p>Nosings should achieve a 30 point difference in light reflectance value to the treads and risers.</p>	<p>Fit contrasting nosings to step edges</p>	1	A



Photo	Item	Issues	Recommendations	P	£
	5.7	<p>A small number of stairs have deep section rails only to one side.</p> <p>Ideally these would be supplemented with a tubular rail to match the existing which will be far easier to grip.</p>	Fit additional tubular rails to deep sections	3R	B
	5.8	<p>The open bulkhead to the stairs in the podium cycle park area poses a risk of collision to a visually impaired user who may scan the ground for obstacles so be unaware of obstructions at high level.</p>	Guard bulkhead up to head level	3R	A

Photo	Item	Issues	Recommendations	P	£
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5.9



5.10 Ideally handrails should turn down at the ends to prevent catching sleeves but this is only a matter to consider if replacing the rails anyway.

6.0 Gardens and Grounds



6.1 We assume that you maintain the raised planters.

If residents were allowed to cultivate these raised planters with kneespace would allow ease of access by wheelchair users.


Photo	Item	Issues	Recommendations	P	£
	6.2	<p>The picnic benches to the podium level have insufficient kneespace under the table surface to allow their use by most wheelchair users.</p> <p>Wheelchair accessible picnic benches are available.</p> <p>The bench to the lower level does have sufficient space.</p>	Purchase wheelchair accessible picnic bench	3R	A
	6.3	<p>A range of seating opportunities is available with arm and back rests available to a reasonable proportion which will provide a useful means of leverage to an elderly or mobility impaired user.</p>			



Photo	Item	Issues	Recommendations	P	£
	6.4	<p>Nosings to the external steps are losing their efficacy due to soiling of the steps posing a trip hazard to all but particularly a visually impaired user.</p>	Deep clean steps	2	A
	6.5	<p>The external steps to the lower level are not fitted with any handrails and thus there is no means of support for an elderly or mobility impaired person, putting these users at increased risk of accident.</p>	<p>Fit new handrails to either side of steps or single central rails</p>	3R	B
		<p>Handrails should be fitted to either side to provide a means of support when going up or down to a user with no strength or mobility to one side of the body such as an amputee.</p>			
		<p>New rails should ideally be tubular and between 40-50mm in diameter so that they are easy to grip and should extend a minimum of 300mm beyond the top and bottom steps so they can be gripped before mounting or dismounting the steps.</p>			
		<p>The new rails should also be well</p>			




Photo	Item	Issues	Recommendations	P	£
	6.6	<p>contrasted to give a further clue of the flights to a visually impaired user.</p> <p>The ramp serving this lower level achieves a gradient of around 1:16 which should be suitable for most users but the worn felt covering poses a trip hazard to all.</p>	Repair felt covering to ramp	3M	A
					
	6.7	<p>The handrails to this ramp are over 100mm wide making them difficult to grip by a user with impaired dexterity to the hands such as an elderly person with arthritis.</p> <p>New rails should ideally be tubular and between 40-50mm in diameter so that they are easy to grip.</p>	Fit ergonomic handrails to ramp	3R	B




Photo	Item	Issues	Recommendations	P	£
	6.8	The MUGA was closed during our inspection but we see no reason this should not be accessible to all.			
	6.9	<p>Lighting to the external steps and ramp is likely to be poor given the type, number and location of light fittings, making it more difficult for a visually impaired user to identify key features such as step edges, level changes and handrails.</p> <p>In this location best practice recommends that a lux level of 30lux is achieved at step level.</p>	Install lighting to ramp and steps	3R	B
					



Photo	Item	Issues	Recommendations	P	£
	6.10	<p>The play surface would prove difficult to mount by a wheelchair user but clearly a flush surface would be difficult to achieve given the deck construction.</p> <p>The ramp at the entrance is however set far too steep for safe wheelchair access at around 1:5 posing a risk of tipping to most chair users.</p>	Extend ramp to achieve min 1:12	3R	A
	6.11	<p>Play equipment is colourful with activities at low and high level and seems appropriate for setting.</p> <p>Ideally a level access roundabout or the like would be offered but the solid deck will pose a practical constraint to this.</p>			




Photo	Item	Issues	Recommendations	P	£
	6.12	<p>The bike store does not seem to be used. It is well sited clear of main pedestrian routes but in the longer term we do suggest you use a contrasted marking/ floor paint at the entry to this area to give a means of warning to a visually impaired user.</p>	<p>Apply contrasting markings at entrance to cycle parking area</p>	3R	A
<p>7.0 Horizontal Circulation</p>					
	7.1	<p>Some walkways are relatively narrow at around 790mm pinching down to as little as 710 in some areas.</p>			
		<p>Gates narrow to as little as 640mm.</p> <p>This may make these walkways difficult to access by wheelchair users. There is no practical adjustment but this restriction should be recognised when formulating PEEPS for disabled residents.</p>			

Photo	Item	Issues	Recommendations	P	£
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7.2		Light levels are poor in and around the lift lobbies with lux levels as low as 20 noted in daylight hours.	Upgrade lighting to lift lobby areas to achieve 100lux	3R	C
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Photo	Item	Issues	Recommendations	P	£
	7.3	<p>Main walkways generally achieve an adequate clear width of around 1500mm widening to well in excess of 1800mm at entrances which is sufficient for two wheelchair users to pass.</p> <p>Some residents have sited benches, pots and other objects on the walkway do narrow the effective width. However these objects will act as useful waymarkers for users with a mental impairment such as someone with dementia.</p>	<p>Provided these obstructions are not continuous and a clear width of at least 900mm is maintained we do not consider them to pose a significant barrier.</p> <p>Whilst some walkways narrow to around a metre, making passing difficult there is no practical alteration.</p>		
	7.4	<p>We noted some buggies stored within the entrance recesses. These were generally set clear of walkways.</p> <p>As flats are outside of our scope it is difficult to comment on provision for wheelchair/buggy storage which would typically be set within a flat but in the longer term the provision of an external</p>			




Photo	Item	Issues	Recommendations	P	£
	7.5	<p>socket to these recesses would allow buggies to be charged in these areas.</p> <p>The contrast between wall and floor is poor to lift/stair lobby areas. This will make it difficult for a visually impaired person to navigate these areas as walls will blend in to floors.</p> <p>This is exacerbated by the poor lighting to these areas.</p>			
	7.6	<p>Rubbish chutes to the Podium are generally set at a suitable height but do require a fair amount of force to operate which may make them difficult to use by some disabled users.</p>	Offer collection service to disabled users	4	Zero
	7.7	<p>Lighting is poor to the lobby and corridor linking core 4 to the ground floor car park with lux levels as low as around 25lux noted at floor level.</p> <p>Lighting is also poor to the core 2 entrance point.</p> <p>This will make it more difficult for visually impaired users to navigate the space and</p>	Upgrade light levels to achieve 100lux at floor level	3R	B




Photo	Item	Issues	Recommendations	P	£
		<p>avoid obstacles, obstructions and other users.</p>			
					
	7.8	<p>Lighting is poor to the shed corridors with lux levels as low as around 30lux noted at floor level.</p> <p>This will make it more difficult for visually impaired users to navigate the space and avoid obstacles, obstructions and other users.</p>	<p>Upgrade light levels to achieve 100lux at floor level</p>	3R	B




Photo	Item	Issues	Recommendations	P	£
	7.9	<p>Access to the refuse chutes in the tower will likely prove difficult for a wheelchair, crutch or frame user due to the restricted door widths on route and lack of manoeuvring space around the chute.</p> <p>To improve access it would be necessary to replace the double lobby doors, which achieve a clear width of only 515mm to one leaf with a single doorset but access to the chute is still likely to prove problematic unless the lobby to the chute can be removed.</p> <p>We assume the lobby is there for fire compartmentation but suggest this is investigated.</p> <p>If this cannot be altered it may be appropriate to provide a collection/ assistance service for disabled residents.</p>	<p>Review access to refuse chutes in tower</p>	<p>3R / EXP</p>	<p>E</p>
					
					

Photo	Item	Issues	Recommendations	P	£
		<p>It appears that residents are already leaving bagged rubbish in the lobbies although we assume this is not in accordance with policy as will likely pose a fire risk.</p>			
	8.0 Means of Escape				
	8.1	<p>You ask that occupiers maintain a clear 'two tile' gap to escape walkways which equates to a clear width of around 600mm.</p> <p>This will be too narrow for many wheelchair, crutch and frame users thus may need to be adjusted where disabled residents occupy a flat served by one of these walkways.</p>	<p>Main min. 3 tile clear width to walkways</p>	4	Zero
	8.2	<p>We understand that you have already identified around 5 vulnerable users who may require assistance in the event of fire and their locations are highlighted within a register housed in your secure LFB box.</p> <p>We suggest that this is extended to include a PEEP for each vulnerable resident in accordance with the findings of the Grenfell fire review.</p>	<p>Put PEEPS in place for disabled residents</p>	1 / 4	A


Photo	Item	Issues	Recommendations	P	£
	8.3	<p>We are please to note that all lifts to both Tower and Podium appear to be fire fighting lifts.</p> <p>Whilst the Grenfell consultation suggests that PEEPS should be capable of implementation without the input of the fire service the consultation is not wholly clear and does seem to suggest that it is recognised this is unlikely to be wholly practical.</p> <p>Thus we suggest that you consult with residents and the fire service to agree use of these lifts for egress in a controlled manner.</p>	Consult on use of fire fighting lifts for evacuation	1	Zero
	8.4	<p>As far as we are aware the residential units are fitted with self-contained smoke alarm systems only.</p> <p>A fire alarm system has been fitted to the basement and shed levels and we assume some form of plan is in place for evacuation of the site in the event of alarm to these areas.</p> <p>Whilst we did note the odd beacon these alarms seem to generally be fitted with sirens only so there is a risk of a deaf user being unawares in the event of fire.</p>	Fit warning beacons throughout	3R	B


Photo	Item	Issues	Recommendations	P	£
	8.5	<p>In the interim fire marshalls should sweep these areas to ensure deaf users are made aware.</p> <p>Given the amount of staff on site we wonder how practical this would be so you may wish to bring forward the install of beacons.</p>	<p>Instruct fire marshalls to sweep all basement and ground floor areas in the event of fire</p>	1	Zero
	8.6	<p>We did not note any refuges to the site.</p> <p>Whilst lifts are all of fire fighting standard a degree of coordination will be required to ensure a disabled user who cannot manage stairs is not stranded in the event of fire.</p> <p>The Grenfell enquiry does not rule out the use of a stay put policy so it may be that the residences are suitably protected and so can be used as refuges in their own right.</p> <p>We understand that compartmentation is good but do suggest this is reviewed in light of the Grenfell enquiry.</p>	<p>Review compartmentation and use of residences as refuges (stay put)</p>	1 / EXP	A
	8.7	<p>Whilst this may deal with levels from Podium upwards this would not apply to the shed and basement car park levels.</p> <p>We suggest refuges are designated to</p>	<p>Designate refuges to lower floor levels</p>	1	D


Photo	Item	Issues	Recommendations	P	£
	<p>9.0</p> <p>9.1</p>	<p>these levels in consultation with the Local Fire Service. Ideally these refuges should be fitted with intercoms to allow users waiting in a refuge to communicate with the chief fire marshal or fire service.</p> <p>They should also be clearly signed with unique references in order that users can clearly communicate their location.</p> <p>Lift lobbies typically achieve sufficient space to create a refuge area clear of the main escape route.</p> <p>Internal Doors</p> <p>Doors from lift cores to ground floor car park achieve a clear width of 785mm.</p>	<p>Best practice now recommends that all internal doors achieve a clear width of at least 800mm. Clear width is measured between door stop and the face of the door when held open.</p>		
		<p>We consider the doors to be within a reasonable margin of best practice standards and likely accessible by most wheelchair users. We find it unlikely it would be considered reasonable to widen the doors in the short term and suggest</p>			



Photo	Item	Issues	Recommendations	P	£
	9.2	<p>this issue be addressed when next replacing the door sets.</p> <p>Doors to the storage sheds achieve a clear width of 780mm.</p>	<p>Best practice now recommends that all internal doors achieve a clear width of at least 800mm. Clear width is measured between door stop and the face of the door when held open.</p>		
	9.3	<p>We consider the doors to be within a reasonable margin of best practice standards and likely accessible by most wheelchair users. We find it unlikely it would be considered reasonable to widen the doors in the short term and suggest this issue be addressed when next replacing the door sets.</p> <p>There is insufficient space to the side of the opening edge of the ground floor shed entrance door to allow a wheelchair user to sit to one side and comfortably pull the door open past his or her chair.</p>	<p>Best practice recommends a space of at least 300mm in width but there is an alternative door to the same space which achieves this.</p>		



Photo	Item	Issues	Recommendations	P	£
	9.4	<p>We tested a sample of the internal steel doors and found that, where fitted with self-closing devices, they generally require excessive force to pull open of more than 50Newtons making them difficult to open by a user with impaired upper body strength.</p> <p>Best practice recommends a maximum opening force of 30Newtons for the first 30 degrees of the door swing and 22.5Newtons thereafter.</p> <p>Where they are not fitted with closers, such as to the shed areas they require minimal force so the closers are the issue.</p>	<p>Adjust self-closing devices to achieve maximum 30 Newtons opening force to internal doors</p>	3M	A
	9.5	<p>The double doorsets on route from the basement car park to tower core achieve a clear width of as little as 515mm through a single leaf.</p> <p>This will make them very difficult to operate by many wheelchair users, thus in the longer term we recommend that these double door sets are replaced with door and a half sets to achieve a minimum 800mm clear width through a single leaf.</p> <p>Alternatively, they could be held open on</p>	<p>Replace basement lobby doors with door and a half sets</p>	3R / 3M	C



Photo	Item	Issues	Recommendations	P	£
		<p>magnetic catches linked to the fire alarm but then they would still present a hazard in a means of escape situation and given the age of door it would seem more logical to replace them.</p>			
	9.6	<p>Flat entrance doors to the tower in particular tend to be poorly contrasted against wall surfaces making the openings difficult to identify by a visually impaired person. The anonymous nature of the openings may also prove confusing to a resident with a mental impairment.</p>	<p>This can be addressed by painting the walls, architraves or doors in a contrasting colour.</p> <p>A 30 point difference in light reflectance values of adjacent surfaces should be achieved. These values are readily available from paint suppliers.</p> <p>This is a matter to be dealt with reactively in this setting and the painting of doors would likely prove a reasonable adjustment upon request by a resident.</p>		


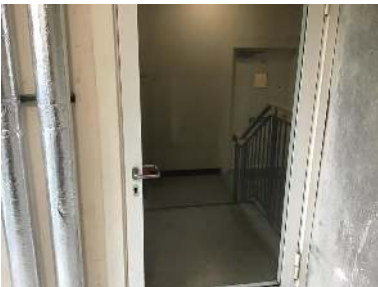
Photo	Item	Issues	Recommendations	P	£
	9.7	<p>Stair lobby doors to the tower achieve a clear width of only 515mm through a single leaf.</p> <p>This will make them very difficult to operate by many wheelchair users, thus in the longer term we recommend that these double door sets are replaced with door and a half sets to achieve a minimum 800mm clear width through a single leaf.</p> <p>As these doors only serve the chutes an interim measure may be to assist disabled residents unless these areas are proposed to be used as refuges in which case we would give their replacement a higher priority.</p>	Replace stair/refuse lobby doors with door and a half sets	3R	E
	9.8	<p>The tower stair lobby doors at level 3 are poorly manifested making them difficult to identify by a visually impaired user, putting him or her at risk of collision.</p> <p>Manifestation should be solid colour and be set at around 1500mm above floor level.</p>	Apply manifestation to lobby doors	3R	A
	10.0	Library			
	10.1	The library is outside our scope although we do understand residents can hire			

Photo	Item	Issues	Recommendations	P	£
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rooms here.

The library would likely be the responsible body in any event.

F Useful Organisations

Useful Organisations

Equality and Human Rights Commission

EHRC

3 More London

Riverside

Tooley Street

London

SE1 2RG

Tel: 0845 604 6610

Textphone: 0845 604 6620

Web: www.equalityhumanrights.com

RADAR - Royal Association for Disability and Rehabilitation

12 City Forum

250 City Road

London EC1V 8AF

Tel: 020 7250 3222

Fax: 020 7250 0212

Minicom: 020 7250 4119

Royal National Institute for the Blind

RNIB Customer Services

PO Box 173

Peterborough PE2 6WS

Tel: 0845 702 3153 - for the price of a local call

Minicom 0845 -58 56 91

Fax. 01733-37 15 55

RNIB Helpline

Tel. 0845-766 99 99 (UK Helpline callers only)

Tel. 020-7388 1266 (switchboard/overseas callers)

Fax. 020-7388 2034

Interpreters available

Textphone users call via Typetalk 0800-51 51 52

Action For Hearing Loss

Head Office

1-3 Highbury Station Road,

London,

N1 1SE

Tel: 020 7359 4442

Textphone: 020 7296 8001

Information Line

Tel: 0808 808 0123 (freephone)

Textphone: 0808 808 9000 (freephone)

SMS: 0780 000 0360

E-Mail: informationonline@hearingloss.org.net

Disabled Living Foundation

380 - 384 Harrow Road

London.

W9 2HU

Tel: 0845 130 9177

Minicom 0870 603 9176

email: info@dlf.org.uk

Web: www.dlf.org.uk

G Glossary of Terms

Glossary of Terms

Ambulant	Disabled person who can walk.
BSL	British Sign Language
CIBSE	Chartered Institution of Building Service Engineers
Coir Matting	Matting formed from coconut fibres
Corduroy Landing	Ribbed floor surface which gives warning to visually impaired person as to the position of stairs.
Door Furniture	Door handles, Knobs etc
DTLR	Department for Transport, Local Government and the Regions
Embossed	Symbols or lettering which stands proud of a surface
Gradient	Slope of a ramp or other surface
Induction/ Hearing Loop	Device which converts your voice into a radio or infra-red signal and transmits this direct to a person's hearing aid, or separate receiver, where it is converted back to sound.
Inductive Coupler	In simple terms, an induction loop fitted to a phone.
Illuminance	The light projected onto a surface measured in Lux.
Lever Furniture	Door Handles
Manifestation	Marking to make an object or feature more visible i.e. marking to a glass door or window.
Nosing	Edge of a step tread
Open riser steps	Steps where there is no material in-filling the gap between treads
Rollover Threshold	Door threshold plate with gently sloping edges to allow easy passage by a wheelchair user.



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Project
Management



Planning
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Building
Surveying



Disabled Access
Consultancy