

**Report for London Borough of Brent**  
Kilburn Library, Salusbury Road, London NW6 6NN

Accessibility Audit

05 September 2022

Prepared By: Sam Crowe MRICS

OCR Surveying Ltd |  
Kemp House | 160 City Road | London | EC1V 2NX  
T: 07737 547 501 | Web: [www.ocrsurveying.co.uk](http://www.ocrsurveying.co.uk)

## Contents

1.0	INTRODUCTION .....	3
1.1	Instruction and brief .....	3
1.2	Legislation .....	3
1.3	Terminology used in this report.....	3
1.4	Methodology and report format.....	3
1.5	Implementation of recommendations .....	4
1.6	Limitations .....	4
1.6.1	<i>Compliance with legislation</i> .....	4
1.6.2	<i>Existing disabled employees</i> .....	5
1.6.3	<i>Purpose of audit</i> .....	5
1.6.4	<i>Exclusion of third parties</i> .....	5

## 1.0 INTRODUCTION

### 1.1 Instruction and brief

This Access Audit report has been prepared for London Borough of Brent and undertaken by OCR Surveying Limited. The audit report was undertaken at Harlesden Library by Sam Crowe MRICS on 23 August 2022. The property was occupied at the time of audit.

The purpose of this audit report is to identify and report upon access issues for disabled users of the property.

### 1.2 Legislation

This report has been prepared in accordance with the Equality Act 2010 and BS 8300:2018 - Design of an accessible and inclusive built environment.

### 1.3 Terminology used in this report

Given below is the meaning of certain terms and abbreviations used in this audit:

“DDA” means Disability Discrimination Act 1995 (as amended by the Special Educational Needs and Disability Discrimination Act 2005)

“Instigator” means the person, or persons, responsible under the DDA for considering discrimination issues and for deciding on any changes required to working practices or physical adjustments required to buildings and property. In multi-tenanted properties this responsibility can fall upon landlords as well as occupying tenants

“Access Policy” means a written document setting out a building occupier’s managerial approach to avoiding discrimination against disabled people.

“Access Plan” means a written document setting out the approach for considering and planning access improvements identified within the Access Audit report. This is effectively a plan setting out the proposed strategy for improving access.

### 1.4 Methodology and report format

This audit report is based on a visual inspection of the property on foot.

Our inspection and reporting has been carried out against a comprehensive checklist of issues derived from:

- BS8300:2018 - Design of an accessible and inclusive built environment.- Code of Practice
- Approved Document ‘M’ of the Building Regulations 2004, and
- Current best practice and guidance

Our findings and recommendations are presented in the form of a table detailed herein. In the table we detail the particular area and item of concern, our comments on this item, our recommendations, and budget costs to provide an indicative value of works required; and a category rating together with photograph and drawing references where applicable.

Our audit report prioritises our recommendations in accordance with the criteria explained in section 3.

## 1.5 Implementation of recommendations

This audit report focuses, primarily, on potential shortcomings in the physical features of the property and the adjustments required to alleviate the shortcomings. While we are not familiar with the building occupier's management practices and procedures, or the service delivery systems, we believe some of the issues that we have identified might be addressed by adjusting management practices and procedures, or the service delivery systems, rather than by physical adjustments to the building. We have suggested some adjustments to management procedures in this audit report, but these will need further consideration by the instigator.

We have made an initial assessment of, and recommendations for, improvements required to reduce the potential liability of both you and the building occupiers under the DDA. When further prioritising implementation of our recommendations, the priorities we suggest in this audit report will need to be reviewed by the instigator. The instigator will need to consider:

- Reasonableness of cost (which might be negligible if new management procedures can be adopted or existing procedures altered)
- How areas of the building are being used and by whom and;
- How any changes in use of the premises will be affected by duties under the DDA

As a part of implementing our recommendations, the preparation of an Access Plan should be considered and developed to address the delivery of accessible services and the associated management issues.

Duties to effect adjustments to the property, or to alter management procedures and practices, will require reconsideration, if use of the property changes.

## 1.6 Limitations

### 1.6.1 *Compliance with legislation*

OCR Surveying Ltd has used their best endeavours when providing advice to enable the instigator, to minimise their exposure to claims of discrimination under the Equality Act.

The Equality Act does not prescribe a detailed set of requirements, which, if satisfied, enable the avoidance of liability for discrimination. Furthermore, the Equality Act does not contain any certification procedures. Consequently, compliance with the Equality Act cannot be guaranteed and it should be noted that a property cannot be certified as being "DDA Compliant".

While the advice provided in this audit report does not offer immunity from litigation under the Equality Act, it will demonstrate that the instigator has taken reasonable measures to discharge their obligations under the Equality Act by commissioning a specialist report. This is even more the case, if recommendations in this audit report are implemented.

### **1.6.2 Existing disabled employees**

It should be noted that this Access Audit report does not take account of the specific needs of any existing disabled employees and accordingly; these needs should be addressed separately through management procedures and PEEP's (Personal Emergency Egress Plans)

### **1.6.3 Purpose of audit**

Please note that this audit report specifically concerns the existing disability discrimination legislation and the related access issues associated with buildings and property generally. While there is an element of overlap between access issues and general health and safety issues, it must be appreciated that this audit report is not a Health and Safety Audit, nor a Fire Risk Assessment.

If health and safety or fire risk issues are of concern, we recommend that separate inspections and reports are commissioned.

### **1.6.4 Exclusion of third parties**

Our inspection of the property and production of this audit report has been undertaken for London Borough of Brent and should not be relied upon by any third parties.

## **2.0 DESCRIPTION OF PROPERTY**

Kilburn library is a two storey Late Victorian period property, constructed in 1893 in Queen Ann style. The frontage is built in Leicester red brick with a plain clay tile roof. The front elevation is two stories in a three bay design. The main entrance benefits from an oversized stone consoled scrolled pediment forming canopy and cast iron bracketed lamp. There is a brick panel above with 'Kilburn Library' picked out in applied lettering.

To the right hand side of the entrance is a double height canted bay window breaking through roofline in the form hexagonal brick panelled turret with a plain tiled roof and topped with a lead ball finial. Windows are presumed to be the original timber sash windows.

The rear of the building comprises a single storey double height library space constructed in solid brickwork with sash windows to either side and clerestorey windows at high level.

## **3.0 CATERGORISATION OF RECOMMENDATIONS**

Consideration should be given to the execution of all recommendations in order to provide accessible facilities and to minimise existing and prospective occupier's exposure to claims of discrimination against employees and service users alike.

Our recommendations have, however, been categorised using the designations and criteria in the table below.

Category	Description of issue
"A"	- A potential deficiency associated with health and safety, which requires immediate, or urgent, attention to eliminate a severe barrier, or a health and safety hazard, to disabled people. The issue concerned, if of a health and safety nature, might also be relevant to non-disabled persons.
"B"	A potential deficiency in respect of which a landlord might be liable as a "service provider" under the DDA.
"C"	A potential deficiency in common parts in respect of which a landlord might be found liable but which could be more appropriately addressed as part of a more comprehensive refurbishment scheme or maintenance works.
"D"	A potential deficiency in respect of which a tenant might be found liable as a "service provider" under the DDA and which might therefore give rise to anticipatory duties to avoid discrimination, or a potential deficiency requiring attention to meet the needs of an existing or potential employee under Part 2 of the DDA.
"E"	A potential deficiency that might be more appropriately addressed by implementing a new, or modifying an existing, management procedure or policy, rather than carrying out physical adjustments or alterations.

We have categorised items based upon our understanding of the current use of the property. Categories given in respect of potential deficiencies provide a general indication only and may, therefore, require further consideration by the instigator. Some further checking may be required to establish whether earlier consideration may be required, dependent upon use of the area. An illustration on the use of category ratings within the report table is shown below:

C - Category C alone is generally applicable

C/D - Both category C and D are applicable or, consideration should be given to carrying out works under both categories

## 4.0 SUMMARY OF COSTS

The total approximate cost of implementing our recommendations is **£17,935.00** plus VAT and fees.

This figure is compiled as follows:

- Category A items sub-total: £1,450 plus VAT and fees
- Category B items sub-total: £1,300 plus VAT and fees
- Category C items sub-total: £14,375 plus VAT and fees
- Category D items sub-total: £810.00 plus VAT and fees
- Category E items sub-total: £Nil

Where items are given a joint category such as B/C the cost has been allocated to the first category i.e. B.


Please note that the total approximate cost includes all costed categorised items. Recommended items of work will require further consideration and prioritisation on the basis of the benefit that they will bring to disabled users, the building maintenance and development plan and the available financial resource of the instigator. The instigator will need to establish the reasonableness or otherwise of implementing the recommended works, (see also Appendix B).



With regard to all approximate cost figures given in this audit, please note that the costings:



1. Include allowances for preliminaries, main contractor's overhead costs and profit
2. Are based on approximate quantities estimated from the visual inspection we carried out on the day of our inspection and are not based on detailed measurements
3. Have not been corroborated by tenders from the marketplace and it should be noted that market conditions and tender factors could produce figures that might differ from those given in this audit
4. Have been prepared on the basis of general rates prevailing in the marketplace at present and are exclusive of:
  - a. Financing charges, if any
  - b. Value added tax
  - c. Professional fees
  - d. Statutory fees
5. Assume that all building work will be undertaken to similar details and using materials similar to those existing
6. Assume each item of work will be carried out under separate building contracts with appropriate contractors at different times. It should be noted however that, if some works are carried out together under a single building contract, certain savings might accrue due to economies of scale
7. Are proposed on a day one basis at Q3 2022 and no allowance has been made to project these costs into the future.




## **5.0 ACCESS AUDIT AND RECOMMENDATIONS**








Item	Element	Observations	Recommendations	Cost £	Priority	Photo
1	<b>Externally</b> <b>Parking</b>	There is no vehicular parking provision to the Library.	No action required	n/a	n/a	n/a
2	<b>Approach to building</b> i Main entrance	The main entrance is stepped, measuring 1600mm wide with 3no steps measuring 130mm Risers and 250mm Goings. Nosings are absent from steps. Tactile paving is absent from steps. Guard railings are provided which serve as a hand rail but this does not meet the standard requirements for a handrail.	Fit new non slip nosings where missing.  Lay new tactile paving to base of steps.  Install new nylon coated handrail to steps, both sides.	£375.00  £400.00  £2,000.00	A  C	

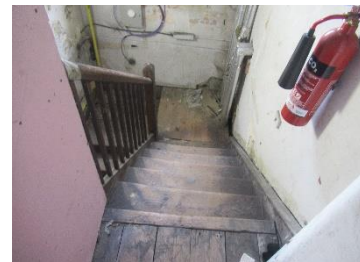

<p>ii</p>	<p>Accessible entrance</p>	<p>An accessible ramp is provided, leading to the main entrance constructed in concrete with a masonry dwarf wall.</p> <p>A painted steel handrail is provided to both sides. Tactile paving is absent.</p> <p>The ramp is 11.34m in length with a rise of 390mm. This is a 1:29 fall and does not meet requirements.</p> <p>There is no level landing at a mid-point.</p> <p>The ramp slope does not contrast with level landings and is not of a slip resistance nature.</p>	<p>Due to site constraints, it is not possible to address the fall or length.</p> <p>Provide and apply non slip finish to slope and level landings.</p> <p>Provide and fit tactile paving.</p>	<p>£675</p> <p>£400.00</p>	<p>A</p> <p>B</p>	
<p>3 i</p>	<p>Signage Generally</p>	<p>Building name signage comprises laser cut stainless steel clear lettering above the no main entrance. The signage contrasts well with the surrounding brickwork.</p>	<p>No action</p>			



ii	Accessible	<p>An information board is present but is absent Braille lettering.</p> <p>Font choice and colour could be more defined with better colour contrast.</p>	<p>Provide and fit new signage to main entrance. To be in accordance with BS 8300:2018 and the Sign Design Guide and inclusive of Braille.</p>	£750.00	B	
4 i	<p><b>External doors</b></p> <p>Main entrance</p>	<p>The main entrance doors are the original painted timber panelled doors with a fully glazed automatic folding doors. Manifestation is absent.</p> <p>Both doorways have a clear width of 1400mm</p>	<p>Provide and apply frosted film manifestation to folding doors at 900 and 1400mm AFFL.</p>	£150.00	B	
ii	Accessible entrance	<p>The accessible entrance is the same as the main entrance</p>	n/a	n/a	n/a	

iii	Garden access door	<p>Access to the garden is via painted timber half glazed double doors with a clear width of 1230mm.</p> <p>There is a stained timber threshold which is in excess of 13mm.</p>	Replace with new painted timber door with low profile threshold	£1,500.00	C	
iv	Fire exit doors, North passage	Doors comprise painted timber half glazed panelled single door with a clear width of 770mm and suitable panic exit hardware	No action	n/a	n/a	
v	Fire exit gates, North passage	<p>The fire exit is a stained timber double gate with a clear width of 1200mm.</p> <p>The method of operation to escape is not within reach of a non ambulant person</p>	Review exit strategy and ensure that a responsible person unlocks the gate in the event of an emergency	n/a	E	




Internally						
5	<b>Transition lighting</b>	<p>Upon entering there is one suspended fluorescent light fitting in the foyer leading into the main library space which has been newly installed as part of energy saving programme of works.</p> <p>The light includes a daylight sensor to ensure levels are adequate at all times.</p>	No action	n/a	n/a	
6	<b>Main entrance foyer</b>	<p>The foyer comprises a small entrance lobby comprising painted plaster masonry walls and a floor finished with a multi directional barrier mat, suitable for non ambulant visitors.</p>	No action	n/a	n/a	



<p><b>7</b></p>	<p><b>Reception desk</b></p>	<p>A small reception desk is provided to the centre of the library. There is a small dropped counter section albeit the desk is filled with PC, screens and equipment blocking any benefit that a non ambulant person may derive.</p>	<p>Desk to be cleared and rationalised if possible, consider replacing the desk with a more suitably sized desk if equipment must stay. In the meantime, put in place a management plan that staff come around desk to discuss queries with non ambulant visitors directly.</p>	<p>£0.00</p>	<p>E</p>	
<p><b>8</b> i</p>	<p><b>Lobbies</b> Staff area lobby</p>	<p>Painted plaster walls and ceiling with painted timber skirting with fluorescent bulkhead lights and multi directional diamond pattern carpet.</p>	<p>Consider decorating joinery in alternative contrasting colour.</p>	<p>incl</p>	<p>C</p>	
<p><b>9</b> i</p>	<p><b>Staircases</b> Staff area staircase (original)</p>	<p>Timber staircase with painted timber handrail 50mm diameter and a clear width of 790mm. Finished in a dark carpet with yellow nosings to bottom and top steps and dark intermediate nosings which do not contrast with carpet finish.</p>	<p>Replace carpet and/ or nosings so that colours contrast sufficiently.  Building constraints do not allow for a second handrail.</p>	<p>£810.00</p>	<p>D</p>	




		Handrail provided to one side only.  Nosings do not contrast sufficiently with carpet.				
ii	Basement staircase	Original open tread timber staircase with wrought timber handrail for plant access only. Nosings are absent.	Paint on contrasting nosings to comply with BS 8300.	£400.00	A	
<b>10</b> i	<b>Lifts</b> Main lift	There are no lifts on the property. All public facing areas are at ground level.	n/a	n/a	n/a	n/a
<b>11</b>	<b>Accessible WCs</b>					
i	Ground floor - Public use	WC measures 3 x 1.7m, finished with floor to ceiling ceramic tiles and vinyl floor.  Doc M pack WC is provided with dark blue handrails.  Mirror is absent above the basin but a larger mirror is present on the rear wall. There is no colostomy bag shelf or padded back rest to WC seat.	Replace wall finishes with a contrasting colour, replace emergency alarm, fit new padded back rest WC seat and fit new TMV to regulate hot water to 43°C. Provide and fit new colostomy bag shelf.	£7,675.00	C	




		<p>The emergency alarm is broken and the reset button is in the wrong location. Hot water is not regulated to 43°C.</p> <p>Generally in poor condition.</p>				
12 i	<p><b>General WCs</b> First floor - Staff use</p>	<p>Single WC finished with painted plaster and vinyl floor including a step with contrasting nosing. Sanitaryware comprises a close coupled WC and wall hung wash hand basin.</p> <p>Colour contrast between decorations is insufficient.</p>	<p>Renew all and joinery finishes with a contrasting colour.</p>	£300.00	C	
13 i	<p><b>Internal doors</b> Ground floor</p>	<p>Doors are painted timber flush doors with vision panels to offices/ circulation and solid to WCs/ stores. Average clear width approx. 840mm with single polished chrome lever handle at 940mm above finished floor level. Doors are painted in a contrasting colour but door leading edges do not contrast.</p>	<p>Decorate leading edges in a contrasting colour. Consider decorating architrave in a contrasting colour.</p>	£500	C	








ii	Accessible WC	The accessible WC door is a painted timber flush door with a clear width of 865mm with a compliant accessible toilet lock. A grab is proved to the back face in a contrasting colour.	No action	n/a	n/a	
iii	First floor	Doors are painted timber flush doors with vision panels to offices/ circulation and solid to WCs/ stores. Average clear width approx. 840mm with single polished chrome lever handle at 940mm above finished floor level. Doors and leading edges do not contrast with surrounding decorations.	Decorate leading edges in a contrasting colour. Consider decorating architrave in a contrasting colour.	£500.00	C	
14	Fire escape doors	The staff access doors serves as a fire escape door and has been reported above.	n/a	n/a	n/a	



<p><b>15</b></p>	<p><b>Door furniture</b></p>	<p>Door furniture comprises a combination of lever handles, pull handles and digilocks. All are located within correct tolerances</p>	<p>No action required</p>	<p>n/a</p>	<p>n/a</p>	
<p><b>16</b></p>	<p><b>Overhead door closers</b></p>	<p>Overhead door closers are provided throughout and generally acceptable</p>	<p>No action</p>	<p>n/a</p>	<p>n/a</p>	<p>n/a</p>
<p><b>17</b> i</p>	<p><b>General circulation</b> Ground floor</p>	<p>Library space is very open plan with no fixed corridor or designated circulation space.  Shelving is used to create zones between areas and clear widths are in excess of 1.8m</p>	<p>No action</p>	<p>n/a</p>	<p>n/a</p>	

ii	First floor	There is a single corridor with a clear width of 1030mm. Finished with broadloom carpet, painted plaster walls and ceilings. Decorations do not contrast sufficiently.	Ensure decorations at next refurbishment contrast between surfaces.	n/a	n/a	
18 i	<b>Floor surfaces</b> Ground floor and mezzanine	<p>Flooring is a combination of carpet tiles and timber effect sheet vinyl.</p> <p>Safety vinyl is provided to the Accessible WC</p> <p>Barrier mat to main entrance and fire exit lobbies is multi directional and suitable for wheelchairs.</p>	<p>No action</p> <p>No action</p>	n/a	n/a	 

ii	First floor and mezzanine	<p>Carpet tiles provided throughout</p> <p>Sheet vinyl has been used to the staff room/ kitchenette and WC.</p>	No action required	n/a	n/a	
19	<b>Lighting</b>	<p>Lighting comprises suspended LED light fittings which have been recently fitted as part of an energy saving programme.</p> <p>Lights benefit from daylight sensors and adjust to the correct LUX levels as required.</p>	No action	n/a	n/a	
20	<b>Electrical socket/outlets/light switches etc</b>	<p>Floor sockets are mounted at varying heights either floor level or 450mm above finished floor level. These are for permanent fittings or staff use only. Dado trunking is provided to ICT areas for public/ teaching PCs</p>	No action required	n/a	n/a	

		Light switches, where present are mounted between 1100 – 1250mm AFFL.				
<b>21</b>	<b>Acoustics</b>					
i	Generally	The library is a double height space with carpet floor finishes and shelving with books throughout. Generally the reverb time was deemed acceptable.	No action.			
ii	Induction loop systems	The library operates a portable induction loop for those with hearing impairments.	Ensure a management plan is in place for use of portable induction loop system.	n/a	E	
<b>22</b>	<b>Signage</b>					
i	Wayfinding signage	Wayfinding signs are present throughout, being suspended at high level. Some of the signs have very small font and colours do not contrast sufficiently.  There is little or no accessible signage, wayfinding signs do not have Braille.	Provide wayfinding signage at the main entrance. All new signage including that to doors should have Braille to accompany text.	£1,500.00	C	

ii	Fire action and directional signage	Combination of photoluminescent and illuminated. Illuminated signs are small and suspended at high level, and not easily read. Some signs present conflicting information.	Replace illuminate exit signage with larger signs and drop the height to approx. 2.6m above finished floor level	£225.00	A	
23	<b>Use of Colour</b>	Generally the use of contrasting colours is not good throughout the building with joinery and walls having an LTV of less than 30 points.	Ensure any redecoration programme follows a similar principle of contrasting colours to delineate routes and obstacles	£0.00	C	
24	<b>Means of Escape in Fire</b> Generally	There are two routes of exit being the main entrance and North passage. Both exits are accessible albeit the final exit to the North passage would be harder to operate.	Review management plan and ensure that a suitable plan is in place for staff and general public through the use of a Personal Emergency Egress Plan (PEEP)	£0.00	E	

	Horizontal escape	Ground, ground mezzanine and first floor have a clear and unobstructed route to a place of safety.	No action	£0.00	E	
	Vertical escape	There is a single route of escape from the first floor. Previously reported upon.	n/a	n/a	n/a	n/a
25	<b>Fire alarm visual warnings</b>	There are no beacon sounders present throughout, either to the library or WCs	Consideration must be given to the safe evacuation of hearing-impaired users in the event of fire. Asses risk and consider installing additional beacons to public facing areas.	£500.00	A	

## 6.0 CONCLUSION AND RECOMMENDATIONS

It should be appreciated that this audit report is effectively the start of a process of analysis and action focused on generally improving accessibility and also avoiding discrimination against disabled persons.

The parties holding duties under the legislation will next need to consider the development of an Access Plan in order to set a strategy for maximising, to a subjectively reasonable level, the accessibility of a property over a subjectively reasonable period of time.

We have prepared this report on the basis that the building is multi-tenanted. We recognise that you have acquired this property for investment, and not for occupation. Notwithstanding this, we believe that you may have a direct duty, as a “service provider” under the Equality Act 2010, to consider our findings and recommendations, in respect of the following items:

1. Improvements to approach and access
2. New signage internally and externally
3. Upgrade to WCs
4. Review of colour scheme and use of contrasting colours to stairs and general areas
5. Provision of fire warning beacons to public facing areas

The total approximate cost of implementing works to deal with the issues indicated above is **£17,935.00** + VAT and fees.

In respect of the remaining findings and recommendations in this audit, we believe that these fall to the individual tenants to consider and, if appropriate address. Both you, as landlord, and the occupying tenants might therefore constitute instigators of different items of work.

The decision to implement each of our recommendations will be reliant on consideration of all relevant factors to determine the reasonableness, or otherwise, of such implementation. Relevant factors for you to consider in connection with the works indicated above will include:

1. Available resources- financial and staffing;
2. Impact on other building users;
3. Impact on the operation of your business;
4. Impact on the viability of your business;
5. The practicality of addressing them;
6. Resources already spent on making access improvements.

The instigator, might also wish to implement recommendations that go beyond the test of reasonableness in order to meet specific needs of individuals.

The instigator should review the recommendations, taking account of programmes of planned maintenance and refurbishment works proposed. It might be possible to modify the proposed maintenance or refurbishment works in a way that enables recommendations to be implemented at no, or relatively little, extra cost. Items such as changes in the use of colour have generally not being costed and should be undertaken during any proposed maintenance and refurbishment work.



Although the report, and indeed the costings may appear daunting, the recommended items of work should be carefully considered and prioritised on the basis of the benefit that they will bring to disabled property users and visitors. Similarly, other items identified within the audit report can be undertaken as part of an on-going maintenance plan. Improving the accessibility of the site does not necessarily need to be a costly burden.

In conclusion, we would recommend that the instigator(s) review the contents of this report to ensure that issues identified are considered and implemented according to duties under the Equality Act 2010.

It is for a duty holder to demonstrate the reasonableness of their actions (or indeed inactions) and factors such as cost, practicability, relative benefit and the like are all relevant factors to take into consideration.