

151-153 Camden High Street,
London, NW1 7JY

Planning Fire Safety Strategy



Control Sheet

Client Name:	Leafgreen Estates Ltd
Project Title:	151-153 Camden High Street, London, NW1 7JY
Report Title:	Planning Fire Safety Strategy
Report Reference:	F1094-001-01
Prepared By:	Brett Littlewood MIHE
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Revision Record			
Rev.	Description	Prepared By	Date
01	First submission	B Littlewood	20/04/2024

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The Contractor must comply with relevant building control instructions and Directives.

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1. Introduction

This Planning Fire Safety Strategy (PFSS) has been prepared by Apex Strategies Ltd. on behalf of Leafgreen Estates Ltd in relation to development proposals at 151-153 Camden High Street, London, NW1 7JY.

Full planning permission (Ref. 2019/5077/P) was granted on 5th May 2022 for the: *"Erection of 2nd floor rear extension and 3rd floor mansard roof extension plus associated alterations to rear; alterations to ground floor shopfront to provide separate residential access; conversion of upper floors from Class A1 retail to Class C3 residential to create a 2-bedroom flat and a 3-bedroom maisonette."*

The current application seeks to vary the extant permission, to include the following changes:

- Relocation of staircase to opposite side of the building; and,
- Third-floor mansard to be replaced by a new monopitch roof over the second floor.

This PFSS has been prepared to address London Plan (2021) Policy D12(a) 'Fire Safety', which states;

"In the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety and ensure that they:

1. *identify suitably positioned unobstructed outside space:*
 - a. *for fire appliances to be positioned on*
 - b. *appropriate for use as an evacuation assembly point*
2. *are designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire; including appropriate fire alarm systems and passive and active fire safety measures*
3. *are constructed in an appropriate way to minimise the risk of fire spread*
4. *provide suitable and convenient means of escape, and associated evacuation strategy for all building users*
5. *develop a robust strategy for evacuation which can be periodically updated and published, and which all building users can have confidence in*
6. *provide suitable access and equipment for firefighting which is appropriate for the size and use of the development."*

London Plan paragraph 3.12.2 notes that;

"The matter of fire safety compliance is covered by Part B of the Building Regulations. However, to ensure that development proposals achieve the highest standards of fire safety, reducing risk to life, minimising the risk of fire spread, and providing suitable and convenient means of escape which all building users can have confidence in, applicants should consider issues of fire safety before building control application stage, taking into account the diversity of and likely behaviour of the population as a whole."

The aim of this document is therefore to demonstrate the relevant fire safety aspects of the proposed development design to date. This document does not constitute the detailed fire strategy under the Building Regulations which will be developed as the scheme progresses. However, this Strategy evidences the provisions made for the safety of occupants and protection of property as well as the provision of suitable access and provisions for firefighting in light of London Plan fire safety policy requirements and the rationale for these measures.

This Strategy is presented in a format which responds to the listed criteria of London Plan Policy D12(A).

The development provides residential accommodation, as such, the proposals have been considered against the requirements set out within The Building Regulations (2010) Approved Document B: Volume 1 - 2019 edition incorporating 2020 and 2022 amendments; hereafter referred to as '**ADB1**'.

This Strategy has been informed by the submitted layouts and elevations prepared by Place Architecture and Design, copies of which are included at **Appendix A**.

This Planning Fire Safety Strategy has been prepared by Brett Littlewood, who is qualified with a HND in Construction and the Built Environment (Civil Engineering), a higher level apprenticeship in Construction Management, has 11+ years experience as a consulting Highways Engineer and is a Member of the Institute of Highways Engineers (MIHE). The author's qualifications and experience are considered to be commensurate with the size, scope and complexity of the development.

2. Planning Fire Safety Strategy

Criteria 1a - Identify suitably positioned unobstructed outside space for fire appliances to be positioned on

Requirements / Guidance:

The Association of Chief Fire Officers provided the following comments in Manual for Streets in relation to access for fire service vehicles:

"A 3.7m carriageway (kerb to kerb) is required for operating space at the scene of a fire. Simply to reach a fire, the access route could be reduced to 2.75m over short distances..."

Criteria 1a Design Comments:

The development is an existing three-storey terraced building with immediate frontage onto the western side of Camden High Street; a one-way single carriageway (northbound direction) providing 3 to 4 vehicle running lanes with intermittent bus lane facilities.

The road is a Red Route with 'No Stopping' permitted on any day 7am - 8pm, except for Loading (max 20 mins, 8am - 4pm) and disabled parking (max 3 hours).

Emergency services are exempt from these Red Route restrictions when carrying out their duties. This allows them to respond to emergencies quickly and efficiently.



It is considered that in the event of an emergency, a fire service vehicle would be able to station itself along Camden High Street within 45m of all points of the proposed development.

Camden High Street provides suitable unobstructed space for the stationing of a fire appliance thereby satisfying Criteria 1a.

Criteria 1b - Identify suitably positioned unobstructed outside space appropriate for use as an evacuation assembly point

Requirements / Guidance:

There is no legal obligation to formally designate an evacuation assembly point in residential buildings that are designed to facilitate a 'Stay Put' evacuation strategy.

Nevertheless, the Regulatory Reform (Fire Safety) Order 2005 (RRO), which is applicable to the common areas of residential buildings, states that *"emergency routes and exits must lead as directly as possible to a place of safety", which in turn is defined as a "safe area beyond the premises"*.

In principle, assembly points should be located sufficiently far from the premises to minimise interference with the fire and rescue service or danger from falling debris, but should be accessible and not so far away as to discourage people from assembling. Ideally the Fire Assembly Point should be located so as not to require the crossing of a road or movement through trafficked areas.

Criteria 1b Design Comments:

Footways in the order of 5m wide are present on both sides of Camden High Street and provide more than sufficient space to accommodate the assembly of occupants evacuating the proposed 2 N° flats, at an appropriate distance to the building, and in a location which minimises interference with the fire and rescue service.

Suitable unobstructed space for evacuation is available from the development thereby satisfying Criteria 1b.

Criteria 2 - Designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire; including appropriate fire alarm systems and passive and active fire safety measures

Fire Detection and Alarm:

An automatic detection and alarm system in a building provides an effective means to identify a fire scenario in the early stages of fire growth and to notify building occupants automatically of the fire scenario with a clear message or sound.

All dwellings should have a fire detection and alarm system in accordance with the relevant recommendations of BS 5839-6. (ADB1 - 1.1)

- **LD2 (Additional Protection):** A system incorporating detectors in all circulation areas that form part of the escape routes from the premises, and in all specified rooms or areas that present a high fire risk to occupants, including a heat alarm in any kitchen and a smoke alarm in principle habitable room(s).
- **Grade D1:** A system of one or more mains powered detectors, each with a tamper proof standby supply consisting of a battery or batteries.

Passive fire safety:

Passive fire safety measures are built-in structural and design features that aim to contain fires and slow their spread without human intervention or mechanical systems. These measures include fire-resistant walls, floors, and doors, which compartmentalise buildings to prevent the spread of fire and smoke between different areas. See '**Criteria 3 - Internal Fire Spread**' for further details.

Automatic Water Fire Suppression Systems (Sprinklers):

Blocks of flats with a top storey more than 11m above ground level should be fitted with a sprinkler system throughout the building in accordance with BS 9251. (*ADB1 - 7.4*)

There are occasions when a sprinkler system can be proposed as part of a fire strategy to compensate for, or overcome, circumstances where a building is unable to follow guidance issued in support of building regulations. (*BS 9251 - Note 4*)

Criteria 2 Design Comments:

Fire detection and alarm systems designed, installed & commissioned in accordance with BS 5839-6:2019 shall be provided within each flat.

All construction shall achieve adequate fire resistance and compartmentation in accordance with the requirements of ADB Tables B3, B4 and C1. See '**Criteria 3 - Internal Fire Spread**' for further details.

The height of the top floor above ground level (~7m) is below the trigger height of 11m for the mandatory implementation of sprinkler systems, and the design the flats otherwise meets the Building Regulations requirements for means of escape (see '**Criteria 4 - Means of Escape**' for further details). As such, active fire safety systems such as sprinkler systems are not required.

Criteria 2 is thereby satisfied.

Criteria 3 - Constructed in an appropriate way to minimise the risk of fire spread

Internal Fire Spread

ADB1 Table B4 sets out minimum periods of fire resistance for a range of development types. For flats (without sprinklers) with a top floor height between 5m and 11m a minimum of 60 minutes fire resistance is required.

With reference to ADB1 Tables B3, B4 and C1, the following tables provide a summary as to where this applies in the proposed development:

Flats:				
Part of building	Minimum provisions when tested to relevant part of BS 476 (minutes)			Type of exposure
	Loadbearing capacity (R)	Integrity (E)	Insulation (I)	
Structural frame	60 mins	n/a	n/a	Exposed faces
Loadbearing wall	60 mins	n/a	n/a	Each side separately
Floors (compartment floors)	60 mins	60 mins	60 mins	From underside
Roofs (any roof that performs the function of a floor)	60 mins	60 mins	60 mins	From underside
External walls (below 1000mm from relevant boundary)	60 mins	60 mins	60 mins	Each side separately
(above 1000mm from relevant boundary)	60 mins	60 mins	15 mins	From inside the building
(beside an external escape route)	30 mins	30 mins	No provision	From inside the building
Compartment walls (separating the flat from any other part of the building, including other occupancies)	60 mins	60 mins	60 mins	Each side separately
Enclosures (not part of a compartment wall / protected shaft) Protected stairway, lift shaft, protected lobby, protected corridor and protected entrance hall in a flat	30 mins	30 mins	30 mins	Each side separately
Fire doorsets				
Separating a flat from a space in common use	FD30(S)			
Enclosing a protected stairway	FD30(S)			
Enclosing a lift shaft	FD30			
Giving access to external escape route	FD30			
Part of enclosure to protected entrance hall in a flat	FD20			

Compartmentation is the process of dividing a structure into 'compartments' for effective risk management. The main objective of compartmentation is to contain a fire within a specific section of a building, limiting the passage of flames and smoke. This then allows more time for occupants to safely evacuate a building and for fire services to extinguish the flames.

In flats, all of the following should be provided as compartment walls and compartment floors:

- A. Any floor (unless it is within a flat, i.e. between one storey and another within one individual dwelling).
- B. Any wall separating a flat from another part of the building.
- C. Any wall enclosing a refuse storage chamber.
- D. Any wall common to two or more buildings.

External Fire Spread:

To resist the spread of fire over external walls, the external surfaces should comply with the provisions in ADB Table 10.1. In residential buildings above 11m in height (applicable to the proposed development), external surfaces and finishings should achieve a reaction to fire performance of Class A2-s1, d0 or better, regardless of their proximity to relevant boundaries.

To resist the spread of fire from one building to another, consideration should be given to the fire resistance of the wall, its proximity to the relevant boundary, and the extent of any unprotected areas (i.e. providing less fire resistance than required by ADB Tables B3 and B4).

External walls 1000mm or more from the relevant boundary, should limit unprotected areas in accordance with either the methods set out in ADB, or, where more precise calculations are required, the methods set out in BRE report BR187 (2nd Edition) 'External fire spread - Building separation and boundary distances'.

The following table provides a summary of the unprotected area requirements and provisions for each proposed elevation. The assessment assumes that a fire does not spread from one compartment to another.

ADB Method 1				
Elevation	Method	Relevant Boundary Distance	Unprotected Area Limit	Proposed Unprotected Areas
Side Elevations	N/A - No external surfaces			
Front Elevation	ADB Method 1	11m (to centreline of Camden High Street)	No Limit	No assessment required
Rear Elevation	ADB Method 1	>3m (notional boundary taken as ½ distance to rear facing elevation of opposite building)	18m²	7.19m² (per compartment)

From the above, the proposed elevations are considered to be acceptable in terms of unprotected areas in relation to boundary / separation distance.

Criteria 3 Design Comments:

All works shall be constructed to achieve adequate fire resistance and compartmentation in accordance with the requirements of ADB Tables B3, B4 and C1.

As the buildings are still being developed, the recommendations regarding fire stopping and protection of openings and concealed spaces will be discussed once the building design has progressed through RIBA Stage 3.

All elevations provide adequate separation from their relevant boundaries in relation to the amount of unprotected areas proposed.

At this early stage of the planning process, no contractor has been appointed for the construction of the proposed development and a detailed Construction Method Statement (CMS) has not yet been prepared. A detailed CMS may be secured through a suitably worded planning condition.

Notwithstanding the above, it is recommended that any future CMS includes a commitment to ensure that the Site Management and all operatives must;

- Develop a Fire Risk Assessment and update throughout the construction period;
- Consider how to detect fires and how to warn people quickly if they start (e.g. installing smoke alarms and fire alarms or bells), and have the correct fire-fighting equipment for putting a fire out quickly;
- Ensure good housekeeping at all times (e.g. avoid build-up of rubbish that could burn);
- Identify sources of fuel, sources of ignition and sources of oxygen and keep sources of ignition and flammable substances apart;
- Ensure workers receive appropriate training on procedures they need to follow, including fire drills;
- The latest Fire Plan showing the emergency exit routes and fire points should be displayed and updated regularly as the site progresses. Keep fire exits and escape routes clearly marked and unobstructed at all times;
- If any visitors are on site it is the responsibility of those who they are visiting to ensure that they are evacuated from the site. A roll call will then be taken to ensure all persons are accounted for.

Based on the above, it is considered that Criteria 3 is satisfied.

Criteria 4 - Provide suitable and convenient means of escape, and associated evacuation strategy for all building users

Means of Escape from Flats (Internal):

ADB sets out the following requirements for means of escape from flats.

Flats with storeys over 4.5m above ground level: (ADB1 - 3.18)

One of the following approaches should be adopted:

- A. Provide a protected entrance hall (minimum REI 30) serving all habitable rooms*
- B. Plan the flat so that both of the following apply.*
 - i. The travel distance from the flat entrance door to any point in any habitable room is a maximum of 9m.*
 - ii. Cooking facilities are remote from the main entrance door and do not impede the escape route from anywhere in the flat.*
- C. Provide an alternative exit from the flat.*

Design Comments:

Both flats have been designed to feature a protected entrance hall serving all habitable rooms. Travel distances within the entrance halls are within the permitted limits (up to 9m).

Inner rooms are limited to a utility room within the second floor flat (Flat 2). This is permitted by ADB 3.7(b).

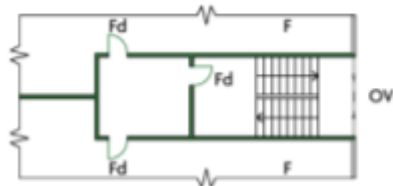
Means of Escape from Flats (Common Areas):

In mixed use buildings, separate means of escape should be provided from any storeys or parts of storeys serving residential accommodation. (ADB1 - 3.5)

The development has the characteristics of a 'small single stair building', with a top floor height below 11m above ground level and no more than three storeys above ground level, and serves no more than two flats per storey.

The applicable means of escape requirements are thereby as per ADB Diagram 3.9(b) (see overleaf).

**b. Small single stair building
with no more than two flats per storey**



The door between stair and lobby should be free from security fastenings.

If the flats have protected entrance halls, the lobby between the common stair and flat entrance is not essential.

NOTES:

1. The arrangements shown also apply to the top storey.
2. If the travel distance across the lobby in diagram (a) exceeds 4.5m, Diagram 3.7 applies.
3. Where, in Diagram (b), the lobby between the common stair and the flat is omitted in small single stair buildings, an automatic opening vent with a geometric free area of at least 1m² is required at the top of the stair, which is operated on detection of smoke at any storey in the stair.
4. For further guidance on the fire rating of the fire doorsets from the corridor to the flat and/or stairway refer to Appendix C, Table C1.

Diagram 3.9 Common escape route in small single stair building

Design Comments:

The upper floors of the existing building are accessed via a stairway to the rear of the ground floor unit. To accommodate the introduction of residential accommodation to the building, a new dedicated pedestrian entrance is proposed along the front elevation, providing a separate means of escape in accordance with ADB 3.5.



Each flat is accessed directly from the protected stairway. The omission of a protected lobby between the stair and flat entrances is permitted by ADB Diagram 3.9(b) as the internal layout of each flat features a protected entrance hall.

An Automatic Opening Vent (AOV) with a geometric free area of at least 1m² is proposed to the head of the stair which will operate on detection of smoke at any storey in the stair.

Stairs:

A stair of acceptable width for everyday use will be sufficient for escape purposes. If it is also a firefighting stair, it should be at least 1100mm wide. The width is the clear width between the walls or balustrades. Any handrails and strings intruding into that width by a maximum of 100mm on each side may be ignored. (ADB1 - 3.60)

Design Comments:

The proposed stair has a width of 900mm which is considered acceptable to accommodate the evacuation of 2 N° flats.

The stair shall be enclosed in fire resisting construction, including fire doors (FD30S) on all levels.

Evacuation Strategy

The 'stay put' evacuation regime is the standard approach to residential developments in the UK . This means that only the flat of fire origin is expected to evacuate in the event of a fire and other occupancies will not be automatically notified.

The 'stay put' strategy is facilitated through the provisions made throughout the development to ensure that a fire is contained within the flat of origin and that the common escape route remains relatively free from smoke and heat in the event of a fire.

Further evacuation of flats will not take place automatically but will be reliant upon the Fire Service, building management or the independent action of individual occupants.

Criteria 4 Design Comments:

Satisfactory means of escape are provided from each of the proposed flats, in accordance with the relevant requirements set out in ADB, and details of the proposed 'Stay Put' evacuation strategy have also been provided.

Criteria 4 is thereby satisfied.

Criteria 5 - Develop a robust strategy for evacuation which can be periodically updated and published, and which all building users can have confidence in

Evacuation Strategy

As discussed under Criteria 4, the development shall adopt a standard 'Stay Put' evacuation strategy where only the flat of fire origin shall be expected to evacuate in the event of a fire.

A template Residential Evacuation Strategy for the development is included at **Appendix B**. This template should be periodically updated as the design progresses and following a detailed Fire Risk Assessment post-construction.

An Evacuation Strategy has been provided therefore Criteria 5 is considered satisfied.

Criteria 6 - Provide suitable access and equipment for firefighting which is appropriate for the size and use of the development

Access and Facilities

For **flats**, either of the following provisions should be made:

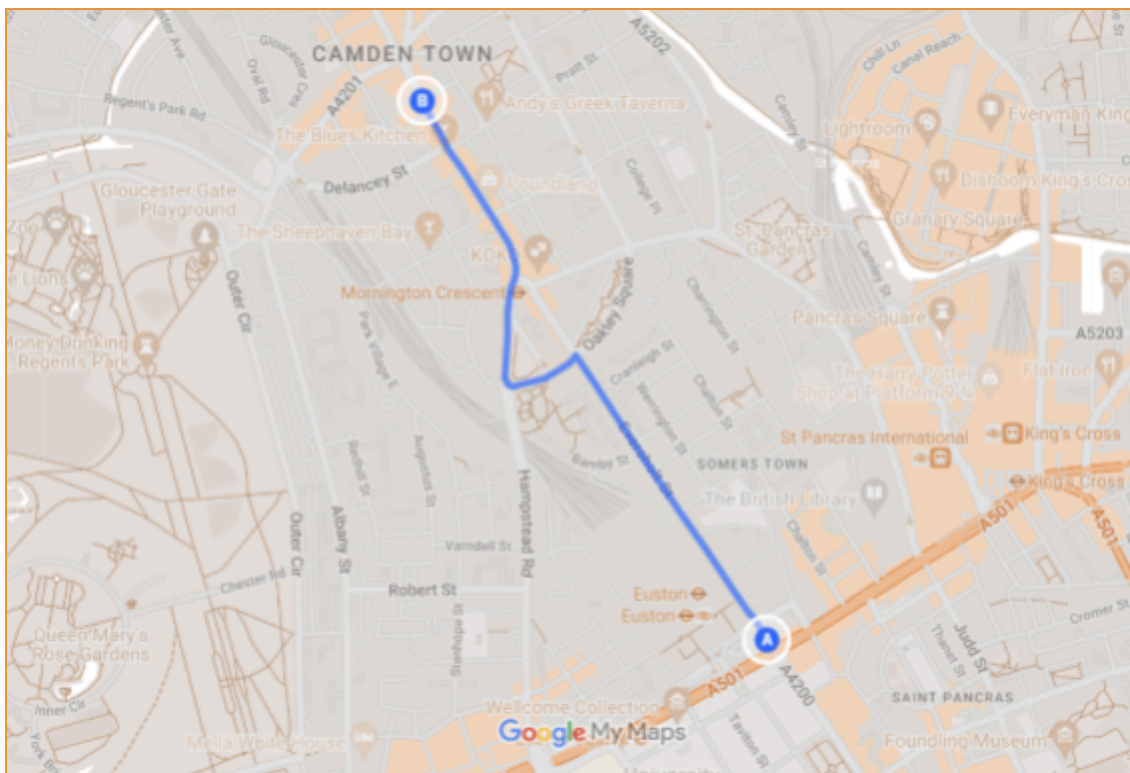
- A. *Provide access for a pumping appliance to within 45m of all points inside each flat of a block, measured along the route of the hose. Every elevation to which vehicle access is provided should have a suitable door(s), not less than 750mm wide, giving access to the interior of the building. Door(s) should be provided such that there is no more than 60m between each door and/or the end of that elevation (e.g. a 150m elevation would need at least two doors).*
- B. *Provide fire mains (ADB1 - 13.2)*

Design Comments:

As noted under **Criteria 1**, Camden High Street provides sufficient width to allow access for a pumping appliance within 45m of all parts of the development. As such, no dry mains facilities are required to support firefighting operations.

The proposed residential access to the front elevation of the building is 900mm wide. This exceeds the minimum width requirement of 750mm.

For information, the nearest Fire Station is Euston Fire Station (A) located along Eversholt Street approximately ~1.4km (5 minutes drive) to the south of the site (B), as illustrated below.



In terms of facilities, as well as supporting the building occupant life safety objectives, the provision of both passive and active fire safety systems also provides substantial benefits to firefighter operations.

Firefighting is facilitated through a protected stairway with AOV which provides a suitable environment in which firefighters can set up their firefighting equipment, plan their operations and provide areas of refuge to which they can retreat to if necessary.

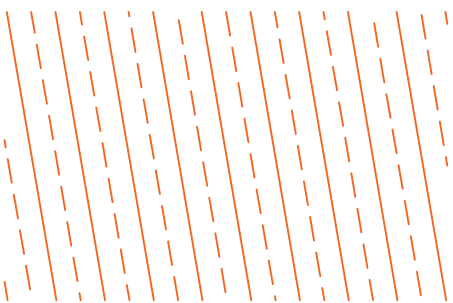
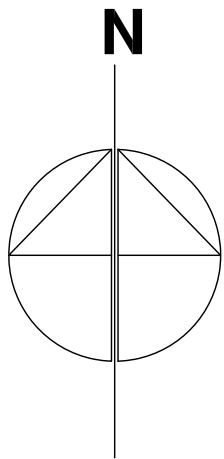
Adequate access and facilities to support fire fighting operations are proposed and therefore Criteria 6 is satisfied.

Appendices

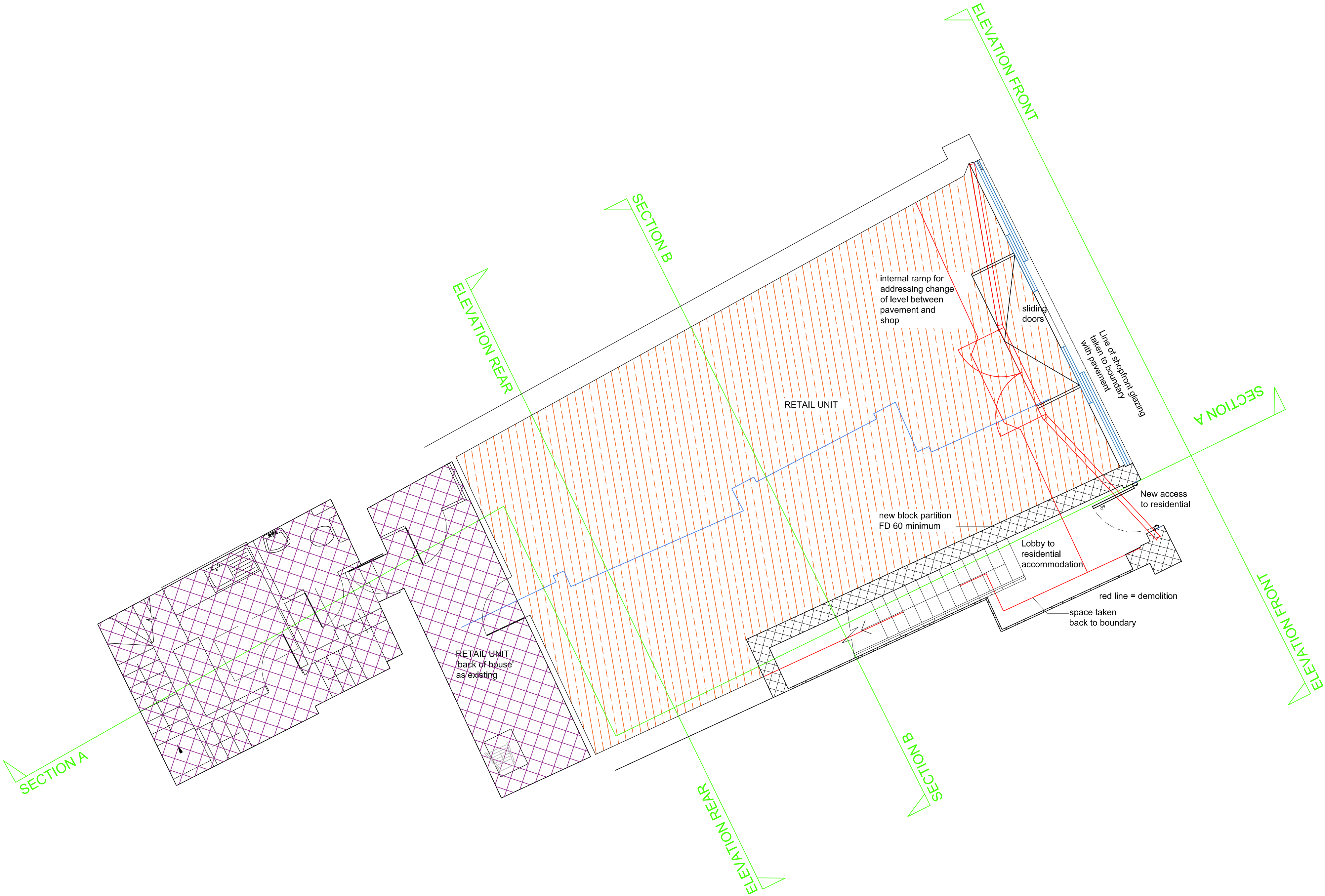
Appendix A: Proposed Site Layouts and Elevations

NOTES:

- 1. Dimensions are in millimetres unless stated otherwise
- 2. Levels are in meters AOD unless stated otherwise
- 3. Dimensions govern. Do not scale off the drawing
- 4. All dimensions to be verified on site before proceeding
- 5. All discrepancies on this drawing to be notified in writing to the Architect.



Retail Unit
Retail area proposed = 76sm
(Retail area existing = 81sqm)



REVISIONS:		
01:	20.03.24	Reduced Scheme re-issue
00:	20.08.19	First Issued

PLANNING

PROJECT
151-153 Camden High Street
Camden
London NW17JR

Mr Simon Itkin

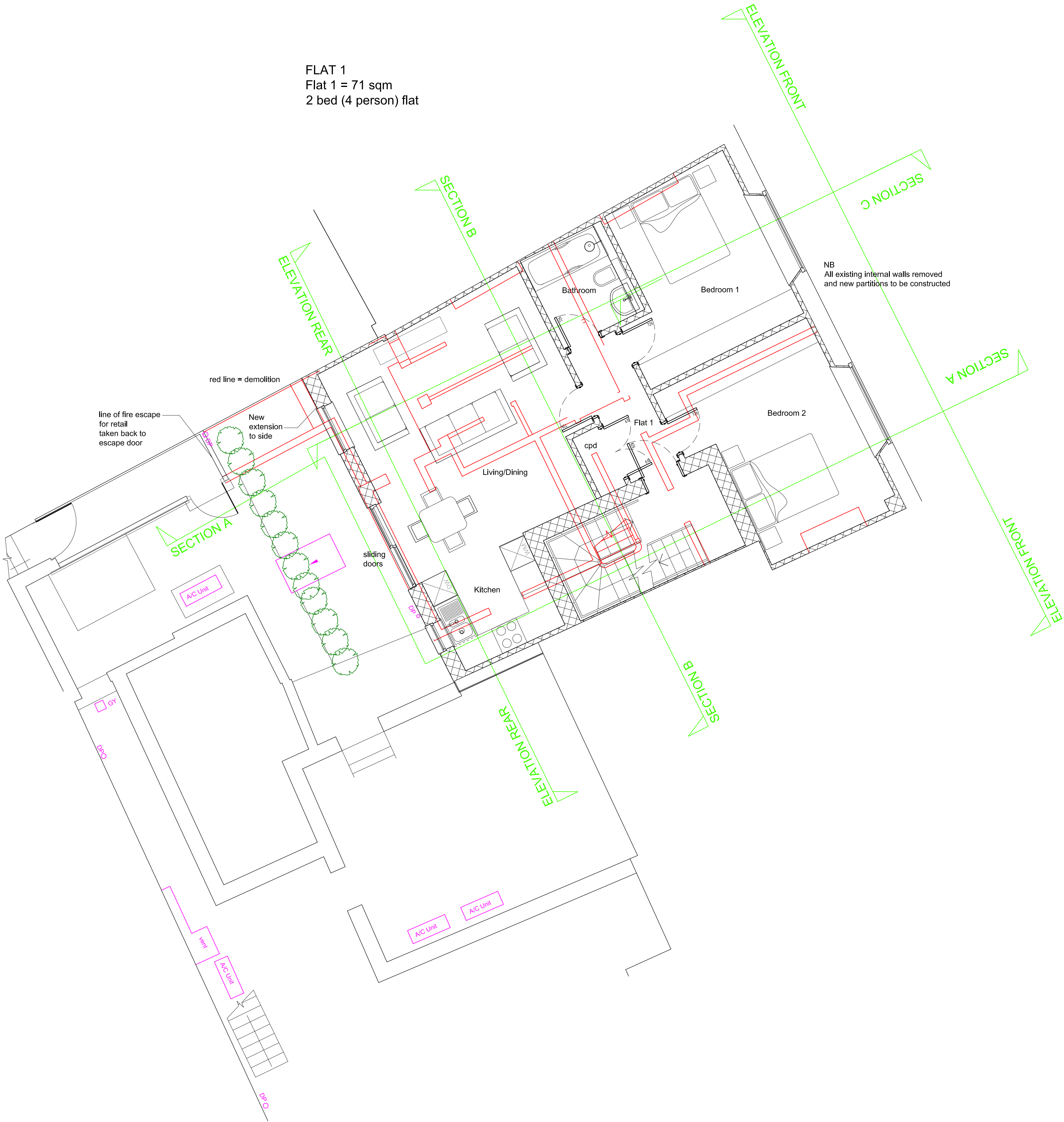
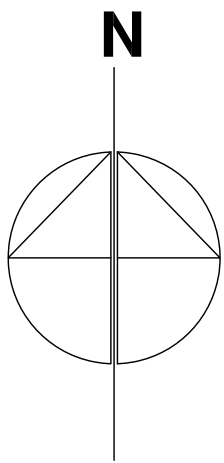
DRAWING

PROPOSED GROUND FLOOR PLAN

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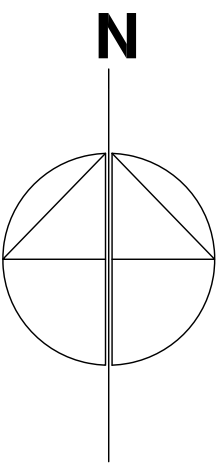
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PROPOSED FIRST FLOOR PLAN

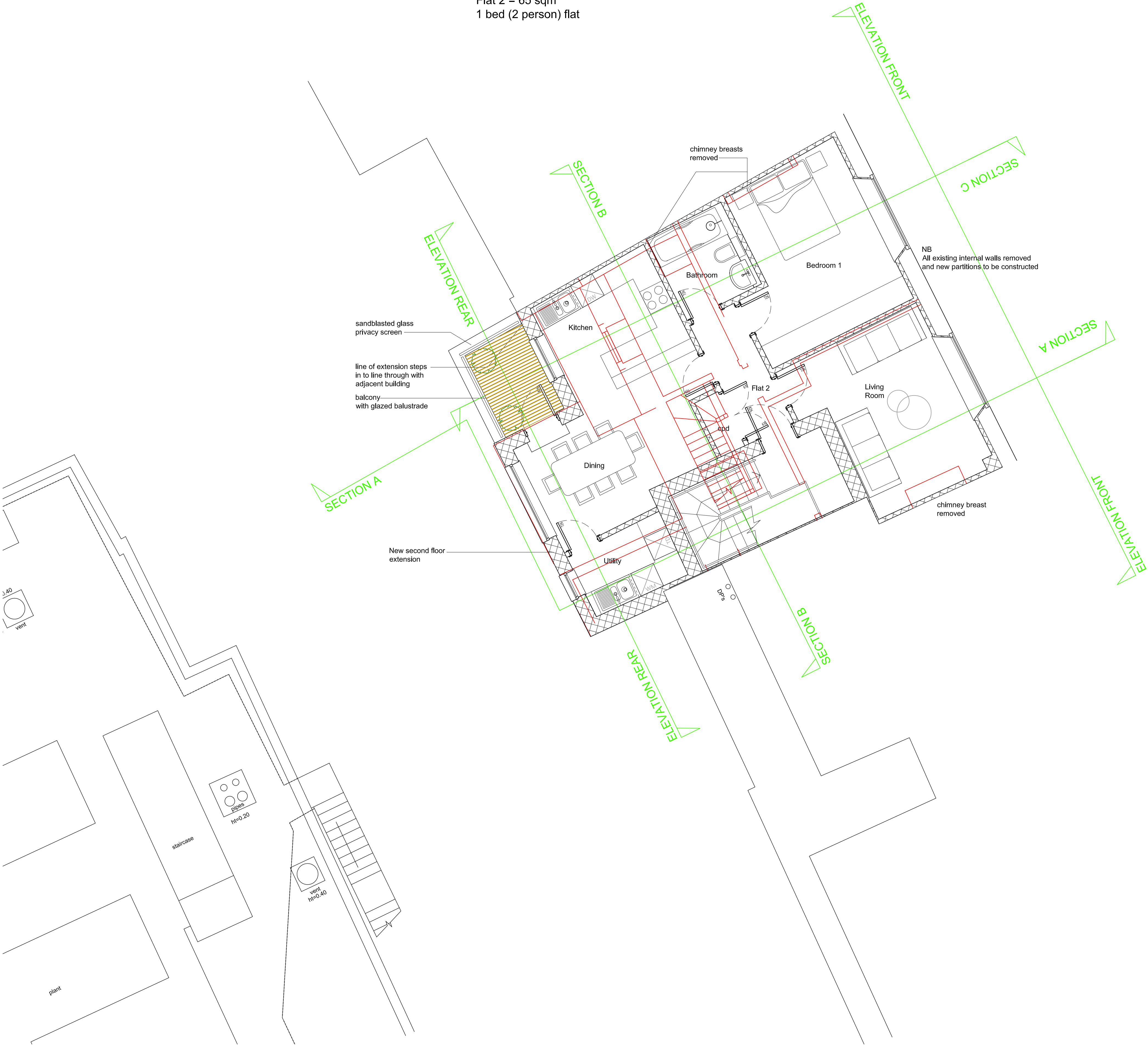
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FLAT 2
Flat 2 = 65 sqm
1 bed (2 person) flat



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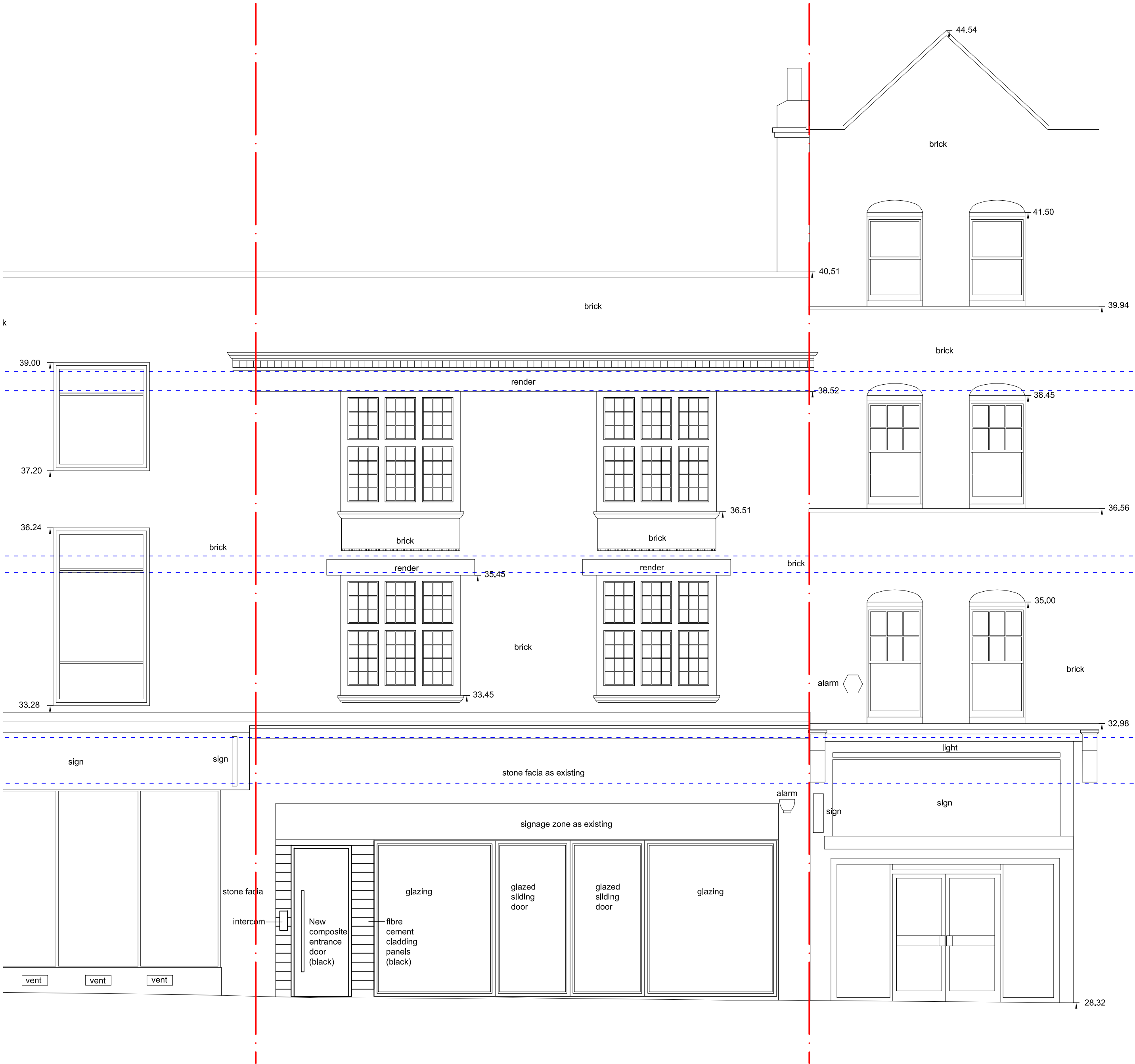
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PROPOSED SECOND FLOOR PLAN

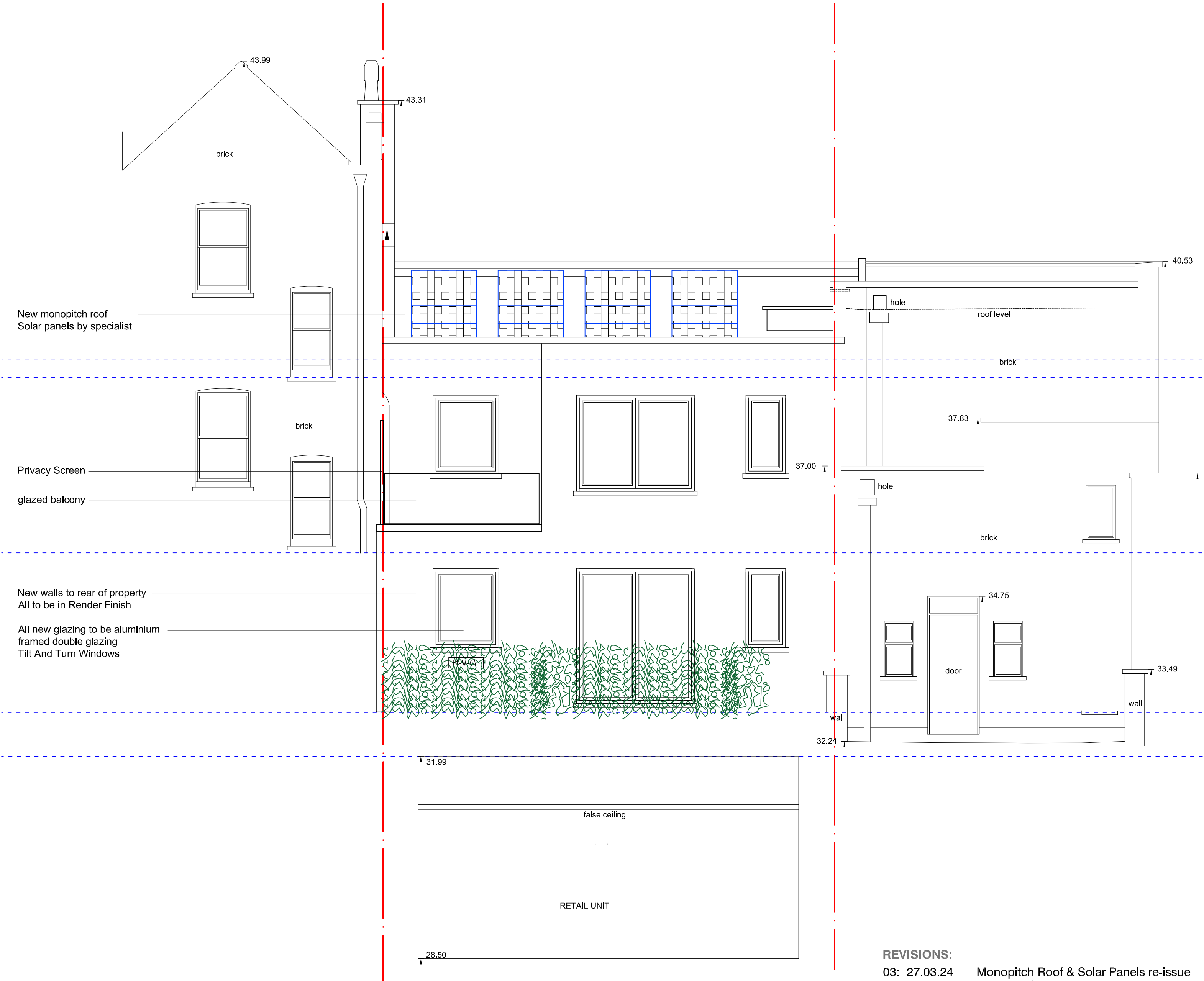
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place*
architecture+design

Place Architecture and Design Limited
The Laurels, 81 Fairhaven Road, Redhill, Surrey RH1 2LB
t: 07900 383835
w: www.place-architectureanddesign.co.uk



Proposed Front Elevation
1:50@A1 / 1:100@A3



Proposed Rear Elevation
1:50@A1 / 1:100@A3

REVISIONS:	
03: 27.03.24	Monopitch Roof & Solar Panels re-issue
02: 20.03.24	Reduced Scheme re-issue
01: 26.02.20	Updated for planning
00: 21.08.19	First Issued

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151-153 Camden High Street
Camden
London NW17JR

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DRAWING

PROPOSED ELEVATIONS

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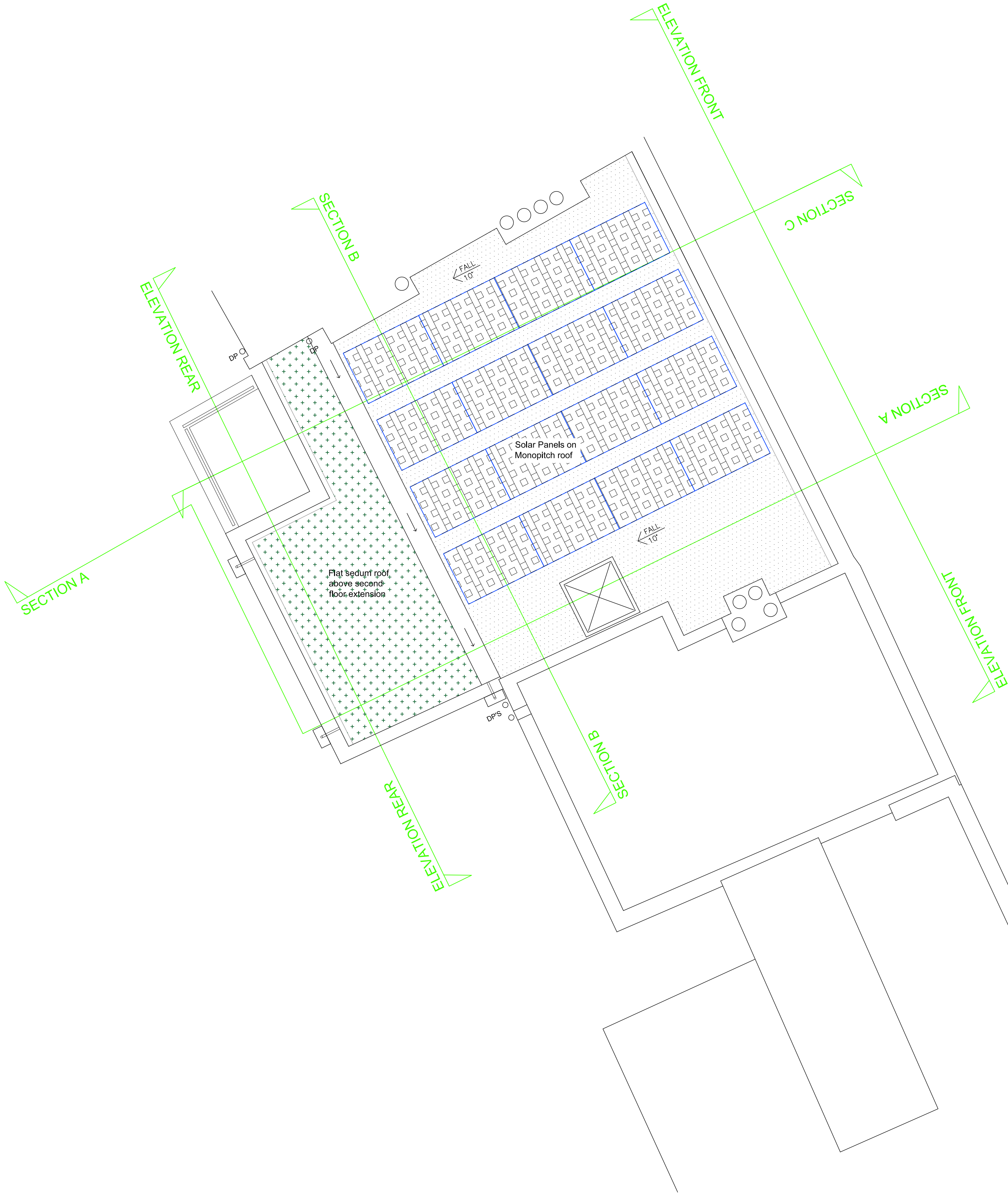
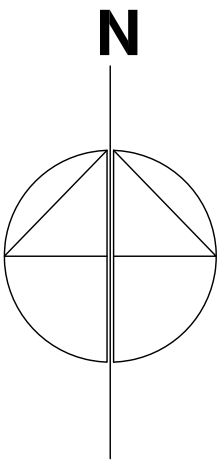
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DRAWING

PROPOSED ROOF PLAN

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Appendix B: Residential Evacuation Template

Fire Evacuation Strategy

Evacuation Strategy for :	Residential
Premises address and contact number	151-153 Camden High Street, London, NW1 7JY
	Tel: TBC
Plan date	TBC – Document prepared for planning
Review date	Annually

Overview

'Stay in Place' - Provisions are made throughout the development to ensure that a fire is contained within the flat of origin and that the common escape route remains relatively free from smoke and heat in the event of a fire within a dwelling.

Stay in Place Evacuation Strategy

- If a fire occurs within a flat, the occupants should immediately alert others in the flat, make their way out of the building and summon the fire and rescue service;
- If a fire starts in the common part of the development, anyone in these areas should make their way out of the building and summons the fire and rescue service;
- All other residents not directly affected by the fire would be expected to 'stay in place' and remain in their flat unless directed to leave by the fire and rescue service.

Escape routes

The escape route from each flat is via the main stair and out onto Camden High Street.

General Evacuation Guidance

Anyone evacuating the building should follow the following guidelines:

- **Stay Calm:** Keep calm to think clearly and make rational decisions.
- **Alert Others:** As you evacuate, alert others if possible without delaying your own exit.
- **Check Doors:** Before opening any doors, use the back of your hand to check if they are hot. A hot door indicates fire on the other side, and you should find another route.
- **Stay Low:** If there is smoke, stay low where the air is clearer and cooler. Crawl if necessary.
- **Close Doors Behind You:** As you exit rooms, close doors behind you to help contain the fire and slow its spread.
- **Evacuate the Building:** Leave the building as quickly as possible and move away from the structure.
- **Choose a Safe Assembly Point:** Once outside, move to an open area away from the building. Keep clear of routes between the building and where the fire vehicle is located in order to minimise interference with the fire rescue service.
- **Do Not Re-enter:** Do not re-enter the building under any circumstances until it has been declared safe by fire or emergency officials.

- **Report to Emergency Responders:** Inform emergency responders of anyone who may be missing and their possible location inside the building.
- **Communicate and Stay Informed:** Call or text family or roommates to let them know where you are, and stay updated on the situation through official channels or instructions from emergency personnel.

Fighting fires – Extinguisher use

Fire extinguishers will only be used where:

- Residents have received training and feel confident in their use
- Where it is deemed safe to do so i.e. there is a clear means of escape, fire is small

Personal safety always takes priority and, if in any doubt, residents should not attempt to extinguish a fire

Location of key safety hazards or other fire related equipment

- Gas supply shut off: **TBC**
- Mains fuse box: **TBC**
- Mains water inlet: **TBC**
- Gas/oxygen cylinders: **TBC**
- Location of fire alarm panel: **TBC**

Responsibilities

For ensuring plan is up to date	TBC - Usually the premises manager
For ensuring adequate staff are on duty to carry out the evacuation plan	As above
For training staff on the evacuation plan and in their roles and responsibilities	As above

Attach any Personal Emergency Evacuation and General Emergency Evacuation Plans to this document



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