FIRE STATEMENT

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293 – 299 & 301 – 305 KENTISH TOWN ROAD, CAMDEN, LONDON, NW9 2TJ

FIRE STATEMENT

BASED ON THE LONDON PLAN GUIDANCE

Report Produced For: Create Asset Management Ltd

Report Produced By: Vemco Consulting

Report Date: July 2024

	Name	Signature	Date
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0.0 SCOPE AND LIMITATIONS

0.1 Scope

0.1.1 This report considers the 12 headings of the London Plan guidance document (London Plan Policy D12 (A1 – A6). This report also refers to Approved Document B Volume 2019 Edition (Incorporating 2020 & 2022 Amendments).

0.1.2 This report applies to mixed-use development at 293 – 299 & 301 – 305 Kentish Town Road, Camden, London. Under assessment is the proposed 4-storey hotel facility within the mixed-use development. The ground floor mainly comprises entry points to the hotel rooms. The hotel rooms are located on the upper floors (1st to 3rd floors) of the building.

0.1.3 All floors of the hotel facility are in scope of this report. Other occupancies within the mixed-use development are not within the scope of the assessment.

0.2 Limitations

0.2.1 The scope of this report is strictly limited to that set out in Section 0.1.

0.2.2 This report is formulated on the basis of information and industry experience available at the time of preparation.

0.2.3 It is applicable to the named project only in accordance with the Client's instructions.

0.2.4 This report may only be distributed in its entirety, without amendment. However, the Client may redact names of those involved in the production of the report, product trade names and other material that they consider sensitive.

0.2.5 The report does not constitute a certification of the project assessed.

0.2.6 This assessment is based on information provided by the client. This may include (but is not limited to) architectural drawings, data sheets, etc. Our advice is limited to the information given in those documents and is necessarily dependent upon the accuracy and completeness of that information.

1.0 INTRODUCTION

1.1 Overview

1.1.1 This Fire Statement has been prepared by Vemco Consulting and is submitted in support of the planning application for the conversion of part of an existing 4-storey building into a hotel facility. The development is located at 293 – 299 & 301 – 305 Kentish Town Road, Camden, London, NW5 2TJ.

1.1.2 This Fire Statement is written in accordance with London Plan Policy D12A and D12B. Approved Document B Volume 2019 Edition (Incorporating 2020 & 2022 Amendments). has also been used.

1.2 Property Description

1.2.1 293 – 299 & 301 – 305 Kentish Town Road is a 4-storey proposed hotel facility located within an existing 4-storey mixed use development (ground to 3rd floor). The hotel facility is located on the 1st to the 3rd floors of the mixed-use building. The ground floor comprises the reception to the hotel and other entry points to the hotel rooms which are on the upper floors of the building. The hotel facility is served by a total of 4 no. stairwells. The height to the topmost finished floor level of the building is 11.7m.

1.3 London Plan

1.3.1 The London Plan is the overall strategic plan for London, setting out the framework for the development of London over the next several years. The London Plan must be considered when planning decisions are made in Greater London.

1.4 Policy D12(A)

1.4.1 Policy D12 (A) states the following:

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.*

1.5 Policy D12(B)

1.5.1 Policy D12 (B) states the following:

All major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor. The statement should detail how the development proposal will function in terms of:

1. *the building's construction: methods, products and materials used, including manufacturers' details*
2. *the means of escape for all building users: suitably designed stair cores, escape for building users who are disabled or require level access, and associated evacuation strategy approach*
3. *features which reduce the risk to life: fire alarm systems, passive and active fire safety measures and associated management and maintenance plans*
4. *access for fire service personnel and equipment: how this will be achieved in an evacuation situation, water supplies, provision and positioning of equipment, firefighting lifts, stairs and lobbies, any fire suppression and smoke ventilation systems proposed, and the ongoing maintenance and monitoring of these*
5. *how provision will be made within the curtilage of the site to enable fire appliances to gain access to the building*
6. *ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures*

1.5.2 "Major development" is defined as *"development involving any one or more of the following—*

a) the winning and working of minerals or the use of land for mineral-working deposits;

b) waste development;

c) the provision of dwellinghouses where—

i. the number of dwellinghouses to be provided is 10 or more; or

ii. the development is to be carried out on a site having an area of 0.5 hectares or more and it is not known whether the development falls within sub-paragraph (c)(i);

d) the provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more; or

e) development carried out on a site having an area of 1 hectare or more." [1]

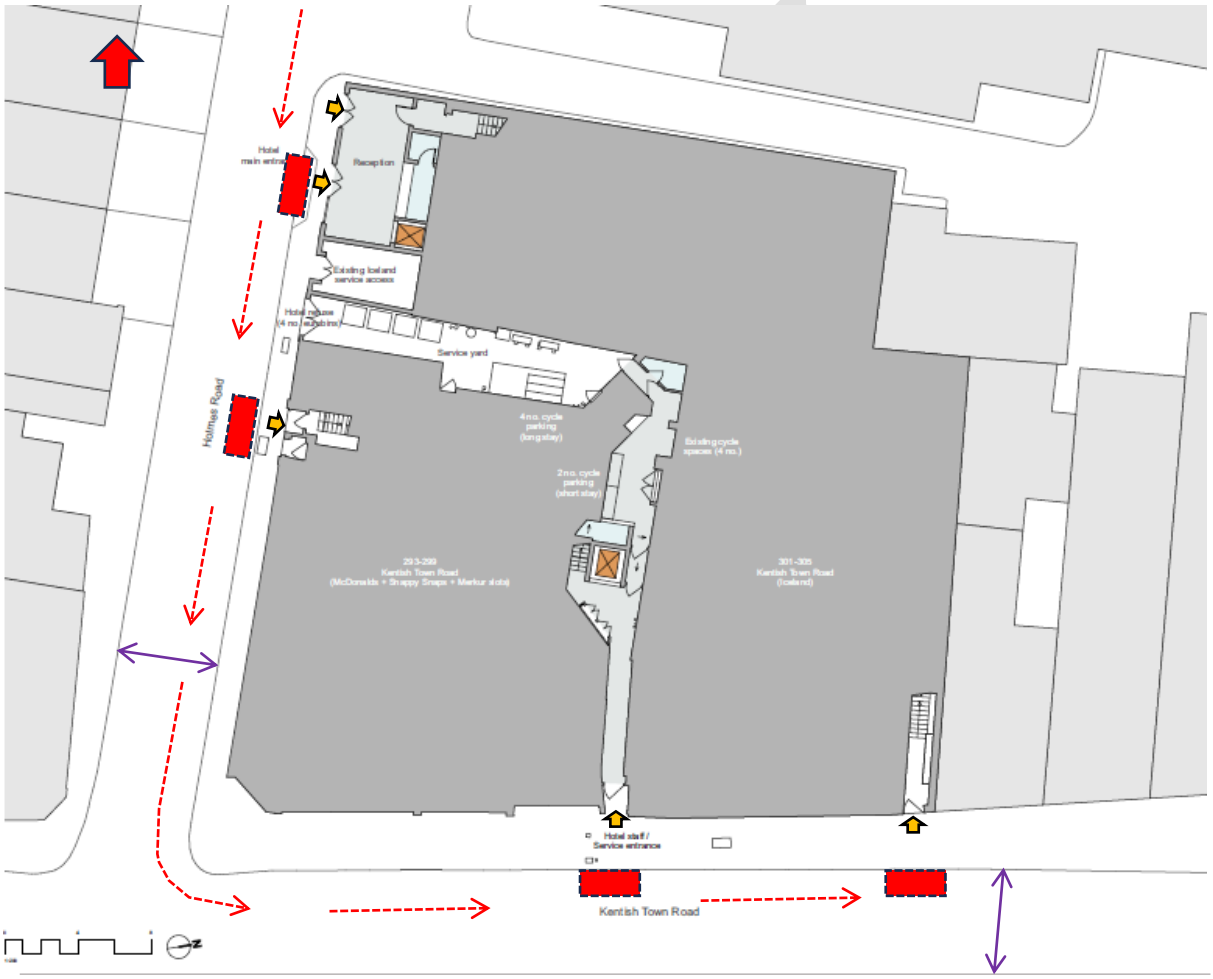
1.5.3 Points a to c are not applicable to the building in question. The floor space area will be more than 1000m^2 as it will be approximately 1800m^2 (point d)). The development at Kentish Town Road London is therefore a "major development" as defined by the Town and Country Planning Order 2015 and Policy D12 (B) therefore applies to the development.

2.0 D12 A1

2.1 a) Unobstructed outside space for fire appliances

2.1.1 The site plan shown in Figure 2.1 demonstrates the Fire and Rescue Service access routes to the building. The access roads to the building are Holmes Road and Kentish Town Road.

Figure 2.1: Fire service access to the development



Key

- Compliant access road widths.
- Indicative parking position of appliance.
- Vehicle tracking route
- Entry points to the building

2.1.2 Table 15.2 of ADB v2 demonstrates the minimum requirements for fire service vehicle access routes. See Table 2.1 below.

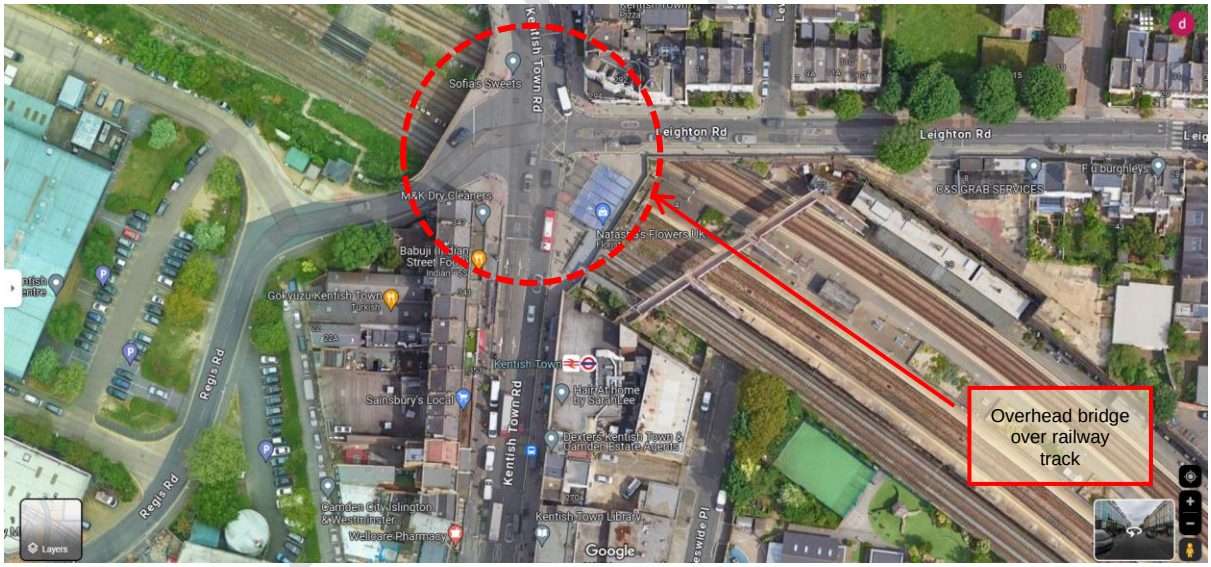
Table 2.1: Typical fire and rescue service vehicle access route specification

Appliance type	Minimum width of road between kerbs (m)	Minimum width of gateways (m)	Minimum turning circle between kerbs (m)	Minimum turning circle between walls (m)	Minimum clearance height (m)	Minimum carrying capacity (tonnes)
Pump	3.7	3.1	16.8	19.2	3.7	12.5
High Reach	3.7	3.1	26.0	29.0	4.0	17.0

Notes:

- Fire appliances are not standardised. The building control body may, in consultation with the local fire and rescue service, use other dimensions.
- The road base can be designed to 12.5 tonne capacity. Structures such as bridges should have the full 17-tonne capacity. The weight of high reach appliances is distributed over a number of axles, so infrequent use of a route designed to accommodate 12.5 tonnes should not cause damage.

Figure 2.2: Overhead bridge leading to building



2.1.3 Holmes Road and Kentish Town Road provide direct access to the building and can be used by a fire appliance to access the entry points of the building. Holmes Road and Kentish Town Road are no less than 3.7m wide (which is compliant) and do not comprise any dead ends. Therefore, turning facilities for a fire appliance are not required. It is noted that there is an overhead bridge (above a railway track) which forms part of the Kentish Town Road network which provides access towards the building as shown in Figure 2.2 above. It is understood that the carrying capacity of the bridge and the entire road network

leading to the building are at least 12.5 tonnes as they are existing main roads. These comply with the requirements of Table 15.2 of ADB v2 above.

2.2 b) Unobstructed outside space appropriate for use as an evacuation assembly point

2.2.1 The proposed hotel will be provided with an assembly point as the evacuation strategy will be simultaneous evacuation. The assembly point will be on Kentish Town Road and will comply with Clause 10.4.4 (c) of BS 9999 which states, "*assembly points should be located sufficiently far from the premises to minimize 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".* It should be noted that ADB v2 does not provide recommendations on the location of assembly points, therefore guidance is taken from BS 9999.

3.0 D12 A2

3.1 Active fire protection systems – fire alarm system

3.1.1 The requirement is given in Part B of Schedule 1 to the Building Regulations 2010 in that '*The building shall be designed and constructed so that there are appropriate provisions for the early warning of fire and appropriate means of escape in the case of a fire from the building to a place of safety outside of the building capable of being safely and effectively used at all material times*.'

3.1.2 The evacuation strategy for this building will be simultaneous evacuation. When a fire is detected anywhere in the building, an alarm signal will sound throughout the entire building invoking immediate evacuation of all occupants.

3.1.3 Table A.1 of BS 5839-1 indicates that the appropriate category of fire detection and fire alarm system for hotel accommodation is either Category L1 or L2. Table A.1 of BS 5839-1:2017 [2] states: "*In bedroom areas, the design requirements are usually based on the recommendations for a Category L3 system. Detectors are, however, typically installed in most other rooms and areas, as a fire in almost any area of the building could pose a threat to sleeping occupants; the system category is, therefore, at least L2. In practice, few, if any, areas are left unprotected and the system category is effectively L1, except that a variation from the recommendations applicable to a Category L1 system might apply to the*

siting of heat, smoke or carbon monoxide detectors in bedrooms; this often follows the recommendations of 22.3e) for detectors in a Category L3 system." A minimum of Category L2 fire detection and alarm system should therefore be provided within the hotel facility in accordance with Table A.1 of BS 5839-1:2017 [3].

3.2 Active fire protection systems – Sprinkler system

3.2.1 Approved Document B requires that an Automatic Fire Suppression System (AFSS) should be fitted to new-build (or materially altered) properties (within the residential purpose group) with floors more than 11m above ground level. The hotel facility is above 11m in height at approximately 11.7m. The building should strictly speaking be provided with a sprinkler system. However, it should be noted that the building is existing, and the height of the building is not being changed as part of the proposed works. It should be noted that the height is only 0.7m above the 11m threshold, which is not a full storey height. Given that the building is existing and that the height is only 0.7m above the 11m threshold, it is deemed acceptable for the building not to be provided with a sprinkler system.

3.3 Active fire protection systems – Smoke control

3.3.1 ADB v2 requires smoke control to be provided for: firefighting shafts, basement storeys, covered car parks, and protected lobbies or corridors that provide access to a basement stair or that separate a stair from a place of special fire hazard. None of the aforementioned scenarios apply to this building, therefore smoke control is not required.

3.4 Active fire protection systems – Manual Fire Fighting / Extinguishers

3.4.1 The Regulatory Reform (Fire Safety) Order 2005 requests that first aid firefighting facilities should be provided in places of work. Therefore, all areas of the building where people work will have manual firefighting equipment.

3.5 Passive fire protection systems

3.5.1 A fire resistance of 60 minutes is required to elements of structure as the building height is more than 11m above ground level and the building is in the "2b Other residential" purpose group [4]. This applies to all structural members, beams, and columns (exposed faces),

load bearing walls (each side separately) and floors (from the underside). Compliance should be achieved for this provision.

3.5.2 Clause 8.10, ADB v2 states: "*In 'residential (other)' (purpose group (2(b)) buildings, all floors should be compartment floors*." All floors should therefore be compartment floors with a fire resistance of 60 minutes from the underside. Compliance should be achieved for this provision.

3.5.3 All protected stairs should have a fire resistance of at least 60 minutes each side separately. This is because it passes through compartment floors and should therefore be within a protected shaft (Clause 8.32, ADB v2). All protected stairs should achieve compliance with this provision.

3.5.4 Any shaft that penetrates compartment floors should be a protected shaft. This includes any service shaft or lift shaft that penetrates the compartment floors. These protected shafts should have a fire resistance of at least 60 minutes each side separately in accordance with Table B4 of ADB v2.

3.5.5 Clause 9.7, ADB v2 states: "*Where a cavity exists above or below a partition between bedrooms because the enclosure is not carried to full storey height or to the underside of the roof covering, the guidance in paragraph 9.5 should be followed*." Clause 9.5, ADB v2 states: "*If the fire resisting construction of a protected escape route is either of the following.*

a. Not carried to full storey height.

b. At the top storey, not carried to the underside of the roof covering.

Then the cavity above or below the fire resisting construction should be either of the following.

i. Fitted with cavity barriers on the line of the enclosure.

ii. For cavities above the fire resisting construction, enclosed on the lower side by a fire resisting ceiling (minimum EI 30) that extends throughout the building, compartment or separated part.

3.5.6 Compliance will be achieved for the above provisions as cavity barriers will be provided within the cavities as necessary.

4.0 D12 A3

4.1 External Walls and Construction materials

4.1.1 Table 12.1 of ADB v2 requires that all materials which become part of an external wall or specified attachment for all 'residential' purpose groups (purpose groups 1 and 2) with building heights above 11m should achieve class A2-s1, d0 or better. Clause 12.7 of ADB v2 states, "*In buildings that include a 'residential' purpose (purpose groups 1 and 2) with a storey 11m or more in height (see Diagram D6 in Appendix D) any insulation product, filler material (such as the core materials of metal composite panels, sandwich panels and window spandrel panels but not including gaskets, sealants and similar) etc. used in the construction of an external wall should be class A2-s1, d0 or better (see Appendix B). This restriction does not apply to masonry cavity wall construction which complies with Diagram 9.2 in Section 9*" [5]. The building under assessment exceeds 11m (at 11.7m) and should strictly speaking be provided with a non-combustible external wall materials. However, it should be noted that the building is existing, and the height of the building is not being changed as part of the proposed works. It should be noted that the height is only 0.7m above the 11m threshold, which is not a full storey height. Given that the building is existing and that the height is only 0.7m above the 11m threshold, it is recommended that further investigation is undertaken into the state of the external walls.

4.2 Attachments to the External Wall

4.2.1 There are no balconies or other specified attachments on the building façade.

5.0 D12 A4

5.1 Means of Escape

5.1.1 The hotel facility is located on the 1st to the 3rd floors of the building. The ground floor comprises the reception to the hotel and the other entry points to the hotel rooms which are on the upper floors. There is a common service yard which is shared by all occupancies including the hotel facility.

5.1.2 Clause 2.5 of ADB v2 states, *"In mixed use buildings, separate means of escape should be provided from any storeys or parts of storeys used for the 'residential' or 'assembly and recreation' purpose groups (purpose groups 1, 2 and 5)."* The residential escape route will be separate from the non-residential escape route. This is compliant with clause 2.5 of ADB.

5.1.3 The maximum permitted travel distance within the hotel bedrooms is 9m in one direction of escape or 18m where there are two directions of escape. The travel distances within all hotel bedrooms on all floors are compliant in this regard.

5.1.4 The maximum permitted travel distance within the bedroom corridors is 9m in one direction or 35m where there are two directions of escape. The travel distances are compliant on all floors.

5.1.5 The maximum permitted travel distances (direct) within the laundry room and the storerooms is 12m in one direction or 23.3m where there are two directions of escape. The travel distances within the laundry room and the storerooms are compliant.

5.1.6 Table 2.1 of ADB v2 permits a single escape route or exit from a storey or part of a storey if it has an occupancy of no more than 60 persons. The parts of the respective floors, where there is a single direction of escape have estimated occupancies of less than 60 persons. Therefore, all floors are compliant in the above regard.

5.1.7 Clause 2.44 of ADB v2 states, *"Ancillary accommodation such as all of the following should be enclosed by fire resisting construction (minimum REI 30)".*

a. Chemical stores.

b. Cleaners' rooms.

c. Clothes storage.

d. Day rooms.

e. Smoking rooms.

f. Disposal rooms.

g. Plant rooms.

h. Linen stores.

i. Kitchens.

j. Laundry rooms.

k. Staff changing and locker rooms.

l. Store rooms".

5.1.8 All storerooms and the laundry room should therefore be enclosed within fire resisting construction of no less than 30 mins in accordance with Clause 2.44 of ADB v2.

5.1.9 Paragraph 2.24 of ADB v2 requires that, *"A corridor serving as part of the means of escape in any of the following circumstances should be a protected corridor.*

a. Every corridor that serves bedrooms.

b. Every dead-end corridor (excluding recesses and extensions a maximum of 2m deep, as shown in Diagrams 2.7 and 2.8).

c. Any corridor shared by two or more occupancies … "

5.1.10 The common corridors providing access to the hotel rooms should be protected corridors in accordance with Paragraph 2.24 (a) of ADB v2. The protected corridors serving the hotel bedrooms on the upper floor levels should have a fire resistance of no less than 30 minutes each side separately in accordance with Table B3 of ADB v2. The access corridor at ground floor level also serves two or more occupancies. The corridor at ground floor level should also be enclosed within fire resistance construction of no less than 30 minutes, each side separately, in accordance with Table B3 of ADB v2. It should however be noted that two or more occupancies are permitted to share a common corridor (as a common escape route) provided none of the occupancies belong in the residential purpose group as discussed in Paragraph 5.1.2 of this report.

5.1.11 Paragraph 2.26 of ADB v2 requires that, *"A corridor providing access to alternative escape routes should be divided by fire doorsets fitted with a self-closing device (and associated screens) where both of the following apply.*

a. It is more than 12m long.

b. It connects two or more storey exits.

The fire doorsets (including any screens) should be approximately mid-way between the two storey exits. They should safeguard the route from smoke, while considering the layout of the corridor and any adjacent fire risks.

5.1.12 Cross-corridor doors have been provided accordingly. The corridors are compliant in this regard.

5.1.13 Clauses 3.4 to 3.5 of ADB v2 provides guidance on the provision of refuges within buildings as follows:

"3.4 Refuges form part of the management plan and offer relatively safe areas for people to wait for a short period only. Refuges should meet the following conditions.

a. Refuges should be provided on every storey (except ones consisting only of plant rooms) of each protected stairway providing an exit from that storey.

b. Refuges do not need to be located within the stair enclosure but should enable direct access to the stair.

c. The number of refuge spaces does not need to equal the number of wheelchair users who may be in the building. A single refuge may be occupied by more than one person during the evacuation procedure.

3.5 The following are both examples of satisfactory refuges.

a. An enclosure such as a compartment (Diagram 3.1), protected lobby, protected corridor or protected stairway (Diagram 3.2).

b. An area in the open air, such as a flat roof, balcony, podium or similar place, that meets both of the following.

i. It is protected (or remote) from any fire risk.

ii. It has its own means of escape.

3.6 Refuges should be a minimum of 900mm by 1400mm in size and accessible by someone in a wheelchair. Where sited in a protected stairway, protected lobby or protected corridor, they should not reduce the width of the escape route or obstruct the flow of people escaping.

3.7 Refuges should be provided with an emergency voice communication (EVC) system complying with BS 5839-9. It should consist of Type B outstations communicating with a master station in the building control room (if one exists) or next to the fire detection and alarm panel. In some buildings, wireless technology may be more appropriate.

3.8 Refuges and evacuation lifts should be clearly identified. In protected lobbies and protected stairways there should be a blue mandatory sign worded 'Refuge – keep clear' in addition to fire safety signs".

5.1.14 Refuges should be provided on: every storey for each protected stairway that provides

escape from that storey; and each final exit leading onto a flight of stairs external to the building. The refuge should have minimum dimensions of 900mm x 1400mm in accordance with Clause 3.6 of ADB v2. Refuges should be provided with an emergency voice communication (EVC) system in accordance with BS 5839-9. It should contain Type B outstations communicating with a master station in the building control room (if one exists) or next to the fire detection and alarm panel in accordance with Clause 3.7 of ADB v2. A wheelchair within a refuge should not obstruct the flow of escaping occupants in accordance with Clause 3.6 of ADB v2. Refuges are provided within the stair enclosure, this is compliant.

5.1.15 The lift should be an evacuation lift for mobility impaired persons in line with Policy D5(B5). It appears that the evacuation lift will be located within the enclosure of a protected stairway. Also, *Appendix G.2.1 of BS 9999 states, "An evacuation lift should be situated within a protected enclosure consisting of the lift well itself and a protected lobby at each storey served by the lift and should be provided with a protected route from the evacuation lift lobby at the final exit level to a final exit*. The evacuation lift discharges into a common corridor leading directly to the outside. This is compliant.

5.1.16 Table 5.1 below shows the estimated occupancy of each floor level. It is based on the assumption that each hotel room will have an occupancy of two persons when it is fully booked.

Table 5.1: Estimated occupancy numbers

Floor	Number of hotel rooms	Occupancy number
1st	33	66
2nd	26	52
3rd	15	30
	Total Occupancy	**148 persons**

5.1.17 Table 2.3 of ADB v2 states that an escape route should have a width of at least 850mm for a storey with an occupancy of up to 110 persons. Based on the assumption that each hotel room will occupy 2 persons, the 1st floor will have an estimated occupancy of 66 persons when all rooms are fully booked (see Table 5.1 above). As such the escape routes on the 1st floor should be no less than 850mm in width. Compliance has been achieved in this respect as the widths of escape routes on the 1st floor are greater than 850mm.

5.1.18 Table 2.3 of ADBB v2 states that an escape route should have a width of at least 750mm for a storey with an occupancy of up to 60 persons. Based on the assumption that each hotel room will occupy 2 persons, the 2nd and 3rd floors will have an estimated occupancy of 52 and 30 persons respectively when all rooms are fully booked (see Table 5.1 above). As such the escape routes on the 2nd and 3rd floors should be no less than 750mm in width. Compliance has been achieved in this respect as the widths of escape routes on the two floors are greater than 750mm.

5.1.19 All hotel bedroom units have ensuite bathrooms that are inner rooms and should therefore comply with clause 2.11 of ADB. However, it should be noted that ADB defines a habitable room as "*a room used, or intended to be used, for people to live in (including, for the purposes of Approved Document B Volumes 1 and 2, a kitchen, but not a bathroom)*". The ensuites are therefore not considered habitable rooms. As such, it is deemed acceptable for the ensuites to be inner rooms to the hotel bedrooms. However, strict management will be in place to prevent fire incidents from occurring within hotel bedrooms.

5.1.20 Clause 3.38, ADB v2 states: "*A protected stairway may only include any of the following*.

a. *Sanitary accommodation or washrooms, as long as the accommodation is not used as a cloakroom. A gas water heater or sanitary towel incinerator may be installed in the accommodation, but no other gas appliance.*
b. *If the protected stairway is not a firefighting stair: a lift well.*
c. *If the protected stairway is not the only stair serving the building or part of the building: a reception desk or enquiry office area at ground or access level. The reception or enquiry office area should have a maximum area of 10m2.*
d. *If the protected stairway is not the only stair serving the building or part of the building: cupboards enclosed with fire resisting construction.*

5.1.21 The protected stairs will comply with clause 3.38 of ADB as none of the above apply.

5.1.22 Clause 3.14 states: "*Regardless of escape strategy, where two or more stairs are provided, it should be assumed that one might not be available during a fire. Each stair should be discounted in turn to ensure the capacity of the remaining stairs is adequate*." The measured width of each stair on plans is shown in Table 5.2 below. Discounting one of the stairs, the remaining stairs have the capacity to evacuate at least 530 persons simultaneously. Since it is estimated that no more than 148 people will occupy the upper floors (see Table 5.1), the stairs are compliant in this regard.

Table 5.2: Stair capacity for simultaneous evacuation

Stairwell	Width (mm)	No. floors served by stair	Stair capacity (using Table 3.1/3.2 of ADB)
1	1000	2	190
2 (discounted)	~~1000~~	~~3~~	~~230~~
3	1000	2	190
4	1000	1	150
Total			**530**

5.1.23 Clause 3.10 states: "*The width of escape stairs should meet all of the following conditions.*

a. *It should be at least as wide as any exits giving access to the stairs.* Met – all stairs are wider than the exits giving access to them.
b. *It should be no less than the minimum widths given in Table 3.1.* Compliance is achieved for this provision.
c. *It should not reduce at any point on the way to a final exit.* Met – All stairs have a constant width throughout.
d. *It should not exceed 1400mm in stairs taller than 30m, unless a central handrail is provided. When a central handrail is provided, the stair width on each side of it should be considered separately when assessing stair capacity.* n/a – the stair widths are less than 1400mm.

5.1.24 Clause 3.36 of ADB v2 states "*Every protected stairway should lead to a final exit, either directly or via an exit passageway. Any protected exit corridor or stair should have the same standard of fire resistance and lobby protection as the stair it serves*". One of the stairways discharges into the hotel reception area. This is deemed acceptable provided the reception is kept fire sterile, i.e., the reception should be kept free of combustible materials.

5.1.25 Clause 3.35, ADB v2 states: "*A protected lobby should be provided between an escape stair and a place of special fire hazard to protect from the ingress of smoke. The lobby should have a minimum 0.4m^2 of permanent ventilation or be protected by a mechanical smoke control system*." There are no places of special fire hazard identified on the floor plans provided, therefore ventilated protected lobbies are not a requirement.

4.5.26 Clause 3.34, ADB v2 states: "*In the following situations, protected lobbies or protected*

corridors should be provided at all storeys above ground, except the top storey.

a. *If the stair is the only one serving a building or part of a building that has more than one storey above or below the ground storey.* There are parts of the hotel accommodation served by a single stair, protected lobbies/corridors are provided at all storeys. This is compliant.

b. If the stair serves any storey at a height of 18m or more above ground level. n/a – top storey is below 18m

c. If the building is designed for phased evacuation. n/a – the building is designed for simultaneous evacuation

d. If the stair is a firefighting stair. n/a – firefighting stairs are not required (see Section 7.3 of this report)

e. If the option in paragraph 3.15b (of ADB v2) has been used so as not to discount one stair when calculating stair widths. n/a – one stair has been discounted in calculating stair widths (see Table 5.2 above).

6.0 D12 A5

6.1 Evacuation Strategy

6.1.1 The evacuation strategy for the hotel facility will be based on simultaneous evacuation. When a fire is detected anywhere within the facility, an alarm signal will sound throughout the entire facility invoking immediate evacuation of all occupants. Once they have evacuated the occupants of the hotel will assemble at the assembly point (see Section 2.2 of this report).

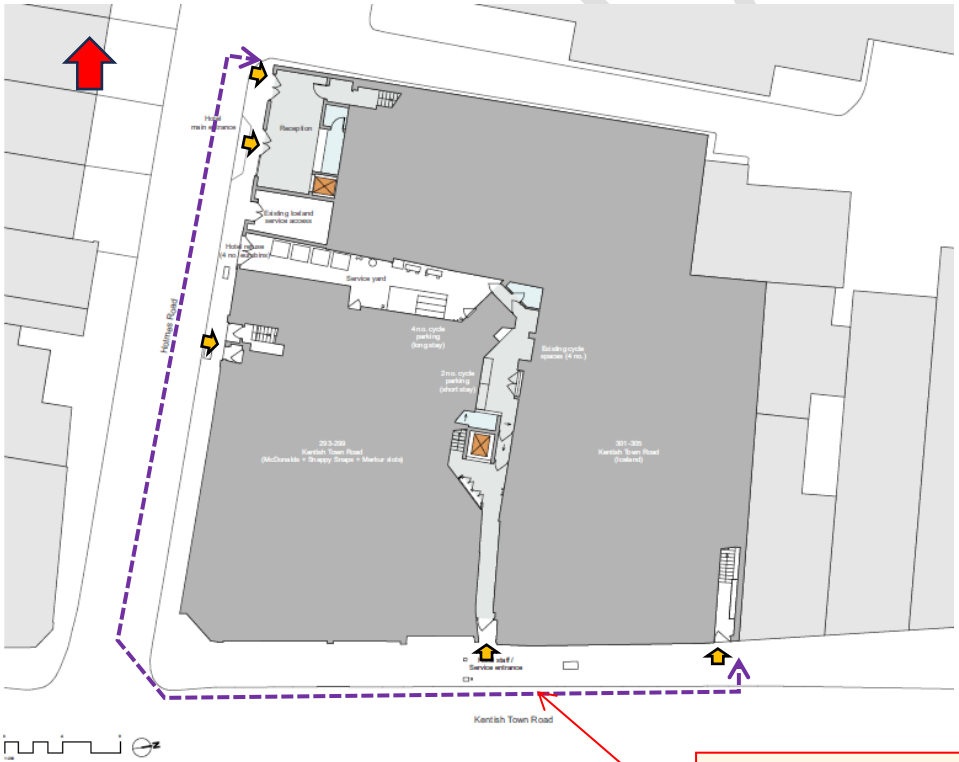
7.0 D12 A6

7.1 Buildings not fitted with fire mains

7.1.1 Table 15.1 of ADB v2 requires that buildings with a height above 11m and not fitted with fire mains with a total floor area of between 2000m^2 and 8000 m^2 should be provided fire appliance access to at least 50% of the perimeter of the building. The fire appliance will have access to at least 50% of the perimeter of the building as shown in Figure 7.1 below. Therefore, fire mains are not required within the building.

7.1.2 Clause 15.3 states: "*Every elevation to which vehicle access is provided should have a door, a minimum of 750mm wide, to give access into the building. The maximum distance between doors, or between a door and the end of the elevation, is 60m (e.g. a 150m elevation would need a minimum of two doors).*" Each accessible elevation has at least an access door which is a minimfum of 750mm (as indicated by the yellow arrows in Figure 7.1). This is compliant.

Figure 7.1: Vehicular Access



7.2 Fire Hydrants

7.2.1 ADB v2 Clause 16.8 states: *A building requires additional fire hydrants if* ***both*** *of the following apply.*

a. It has a compartment with an area of more than 280m^2.
b. It is being erected more than 100m from an existing fire hydrant.

7.2.2 The building has a compartment greater than 280m^2. However, the nearest fire hydrant is less than 100m from the building on Raglan Street as shown in Figure 7.2, therefore, additional fire hydrants are not required.

Figure 7.2: Fire hydrant

8.0 D12 B6

8.1 Future development of the asset

8.1.1 The London Plan Guidance Sheet for Policy D12(B) states that: "*To ensure the highest standards of fire safety are considered throughout the lifecycle of the proposed asset, London Plan Policy D12(B) part 6 requires applicants to consider how, if the proposed asset was to be redeveloped in the future, the fire strategy and the protective measures within the asset would not be compromised*." [6] The Responsible Person and his or her advisors will therefore consider how the fire safety measures at the development will be impacted if the building is altered in the future.

8.1.2 The "Responsible Person" is defined by Article 3 of the Fire Safety Order 2005 as:

"*(a) in relation to a workplace, the employer, if the workplace is to any extent under his control;*

(b) in relation to any premises not falling within paragraph (a)—

(i) the person who has control of the premises (as occupier or otherwise) in connection with the carrying on by him of a trade, business or other undertaking (for profit or not); or

(ii) the owner, where the person in control of the premises does not have control in connection with the carrying on by that person of a trade, business or other undertaking."

8.2 The "Golden Thread" of Information

8.2.1 The "golden thread" of information is the "*information about the building structure and materials, detailing the maintenance, testing and inspection routine as well as how fire risk assessments have been undertaken and actions implemented*" [7]. This information must be handed over to the Responsible Person when construction of the building is complete. It should also be passed to any subsequent Responsible Persons if the building owner changes. This information should be retained and updated throughout the life cycle of the building (i.e., until the building is decommissioned or demolished).

A.0 Appendix A – List of drawings used

A.0.1 The client provided the following drawings used in this assessment:

- 2305-LAT-XX-00-DR-A-10100-
- 2305-LAT-XX-00-DR-A-10101-
- 2305-LAT-XX-00-DR-A-10102-
- 2305-LAT-XX-00-DR-A-10103-
- 2305-LAT-XX-00-DR-A-10104-
- 2305-LAT-XX-00-M2-A-P10001-Sheet Title
- 2305-LAT-XX-00-M2-A-P10002-Sheet Title
- 2305-LAT-XX-00-DR-A-15100-
- 2305-LAT-XX-00-DR-A-15101-
- 2305-LAT-XX-00-DR-A-15102-
- 2305-LAT-XX-00-DR-A-15103-
- 2305-LAT-XX-00-DR-A-15104-
- 2305-LAT-XX-00-M2-A-10201-
- 2305-LAT-XX-00-M2-A-10202-Sheet Title
- 2305-LAT-XX-00-M2-A-10203-Sheet Title
- 2305-LAT-XX-00-M2-A-10204-Sheet Title
- 2305-LAT-XX-00-M2-A-10205-Sheet Title
- 2305-LAT-XX-00-M2-A-10206-Sheet Title
- 2305-LAT-XX-00-M2-A-10301-
- 2305-LAT-XX-00-M2-A-10302-
- 2305-LAT-XX-00-M2-A-10303-
- 2305-LAT-XX-00-M2-A-10304-
- 2305-LAT-XX-00-M2-A-15301-
- 2305-LAT-XX-00-M2-A-15302-
- 2305-LAT-XX-00-M2-A-15303-
- 2305-LAT-XX-00-M2-A-15304-

B.0 Appendix B – Form 1

Form 1 – Fire Statement (London Plan Policy D12B) for major development
Site address: 293 – 299 & 301 – 305 Kentish Town Road, Camden, London, NW5 2TJ
Description of development: Conversion of parts of an existing 4-storey mixed use development into a hotel. The ground floor comprises other occupancies as well as the reception to the hotel and other entry points to the hotel rooms. The hotel rooms are located on the upper floors of the building. The hotel facility is served by a total of 4 no. stairwells. The height to the topmost finished floor level of the building is 11.7m.
Name, qualifications, professional memberships and experience of author Basil Jackson has completed this fire statement. Basil is a Chartered Engineer with the UK Engineering Council and holds full member grade with the Institution of Fire Engineers. Basil has over 25 years' experience dealing with infrastructure and has developed significant expertise in fire engineering responding to some technically challenging projects including the production of external wall assessments and CFD smoke modelling on 30m high rise apartment blocks. He has provided valuable contributions to clients through the delivery of major commissions, providing strategy and leadership to prevent project failure. His competence, qualifications and experience are amongst the best in the industry and will bring great value to any project he is involved in. Professional Memberships: UK Engineering Council - Reference No: 479398 Institution of Fire Engineers - Registration No: 00063872 Institution of Civil Engineers - Registration No: 47200782 Chartered Association of Building Engineers - Registration No: 67123747 Qualifications: BEng - Bachelor's degree in Civil Engineering MSc (Fire) - Master's degree in Fire Safety Engineering CEng - Chartered Engineer MIFireE - Member of the Institution of Fire Engineers MICE - Member of the Institution of Civil Engineers

MCABE - Member of the Chartered Association of Building Engineers	
Has a Gateway One Statement been submitted? No (n/a – top storey is below 18m above ground level)	
Policy considerations (D12B)	**Potential Gateway One cross reference**
The building's construction: methods, products and materials used	Gateway One Q6f&g
Means of escape for all building users and the evacuation strategy	Gateway One Q6h
Passive and active fire safety measures	Gateway One Q6i
Access and facilities for the fire and rescue service	Gateway One Q10, 11, 13 & 14
Site access for the fire and rescue service	Gateway One Q10 & 11
Modifications to the development and the 'golden thread' of information	
Where a lift core is provided, at least one lift is an evacuation lift See Form 3	London Plan Policy D5(B5)
Declaration of Compliance by a competent person	The technical content produced for this planning application complies with all the relevant legislation and requirements of London Plan Policy D12 and D5(B5). Signature: Basil Jackson BEng(hons), MSc(Eng), MSc(Fire), DMS, CEng, C Build E, MICE, MIFireE, MCABE Date: 08/07/2024

C.0 Appendix C – Form 3

Form 3 – provision of evacuation lift	
Site address	293 – 299 & 301 – 305 Kentish Town Road, Camden, London, NW5 2TJ
Description of development	Conversion of parts of an existing 4-storey mixed use development into a hotel facility. The ground floor comprises other occupancies as well as the reception to the hotel and other entry points to the hotel rooms. The hotel rooms are located on the upper floors of the building. The hotel facility is served by a total of 4 no. stairwells. The height to the topmost finished floor level of the building is 11.7m.
Name, qualifications, professional memberships and experience of author	Basil Jackson has completed this fire statement. Basil is a Chartered Engineer with the UK Engineering Council and holds full member grade with the Institution of Fire Engineers. Basil has over 25 years' experience dealing with infrastructure and has developed significant expertise in fire engineering responding to some technically challenging projects including the production of external wall assessments and CFD smoke modelling on 30m high rise apartment blocks. He has provided valuable contributions to clients through the delivery of major commissions, providing strategy and leadership to prevent project failure. His competence, qualifications and experience are amongst the best in the industry and will bring great value to any project he is involved in. Professional Memberships: UK Engineering Council - Reference No: 479398 Institution of Fire Engineers - Registration No: 00063872

	Institution of Civil Engineers - Registration No: 47200782 Chartered Association of Building Engineers - Registration No: 67123747 Qualifications: BEng - Bachelor's degree in Civil Engineering MSc (Fire) - Master's degree in Fire Safety Engineering CEng - Chartered Engineer MIFireE - Member of the Institution of Fire Engineers MICE - Member of the Institution of Civil Engineers MCABE - Member of the Chartered Association of Building Engineers
Policy considerations Policy D5(B5) **Potential cross reference London Plan Policy D12A (4&5) and Policy D12B(2)**	
Details of the evacuation lift and shaft	
Unknown	
Capacity assessment	
• Likely number of occupants 1F: 33 hotel rooms (2P) = 66 persons 2F: 26 hotel rooms (2P) = 52 persons 3F: 15 hotel rooms (2P) = 30 persons **Total: 148 persons** 148 persons will be evacuating simultaneously from the hotel facility. Determination of occupancy assumes that each hotel room will be occupied by 2 persons when the facility is fully booked. • Nature of occupancy	

Based on 2011 census data showing that 1.9% of the population are wheelchair users, it is therefore assumed that at least 3 occupants within the hotel facility may require evacuation in a wheelchair. No occupants will require evacuation via a bed as the building is not a hospital or residential care home.

- Calculation of the evacuation lift capacity required

The hotel will have a simultaneous evacuation policy. Therefore, in the event of a fire in the building, all occupants will evacuate. There will be up to 148 occupants evacuating at one time. Three (3) of those occupants are assumed to be wheelchair users. Thus, three (3) persons, plus three (3) staff, will be required to use the evacuation lift at any time.

The required evacuation lift capacity = 6.

- Evacuation lift capacity that would be provided

The provided evacuation lift capacity = 2

- Potential risks during evacuation due to the anticipated capacity.

Given that the required lift capacity is less than the provided capacity, no less than three trips will be required (i.e., 2 persons per trip) to evacuate all 3 wheelchair users to a place of ultimate safety. This could present a risk of fire exposure to wheelchair users, while they wait their turn to be evacuated. On the other hand, the above risk will be mitigated provided all relevant requirements for refuges are met. Furthermore, the height of the building (11.7m) presents a lower risk to life safety in comparison to a high rise building which would require a longer time to reach a place of ultimate safety from a high floor level. This means that there should be shorter waiting times for wheelchair users and therefore, less risk to fire exposure.

Evacuation strategy

- Proposed measures that support the evacuation of the development.

Refuges will be provided within the facility. The refuge will have minimum dimensions of 900mm x 1400mm in accordance with Clause 3.6 of ADB v2. Refuges will be provided with an emergency voice communication (EVC) system in accordance with BS 5839-9. It will contain Type B outstations communicating with a master station in the building control room (if one exists) or next to the fire detection and alarm panel in accordance with Clause 3.7 of ADB v2. A wheelchair within a refuge will not obstruct the flow of escaping occupants in accordance with Clause 3.6 of ADB v2.

An evacuation lift will be provided within the building. BS 9999 provides guidance on evacuation lifts. Appendix G.2.1 of BS 9999 states, "*An evacuation lift should be situated within a protected enclosure consisting of the lift well itself and a protected lobby at each storey served by the lift, and*

should be provided with a protected route from the evacuation lift lobby at the final exit level to a final exit. It should be associated with a refuge (see G.1) and should be clearly identified. G.2.1."

- Risks to the safe use of the evacuation lift during evacuation

There are no known risks relating to the safe use of the evacuation lift during evacuation.

Evacuation lift management plan

There will be a competent person (i.e., trained hotel staff) on site to operate the evacuation lift immediately. Those managing the building (including staff) will be responsible for ensuring that wheelchair users are able to use the evacuation lift. The Responsible Person keeps a Health and Safety File containing a number of key documents relating to the building, including O&M Manuals relating to evacuation lifts and any limitations associated with their operation. The Responsible Person will ensure that the necessary information/training is available to the expected users (and hotel staff) of the evacuation lift.

Operation of the evacuation lift will be as follows:

1. Operation of the "Evacuation Lift" switch or signal from a fire detection system will return the evacuation lift to final exit level and park with its doors open.
2. When the evacuation lift is at final exit level and the "Evacuation Lift" switch has been operated, the car controls will be enabled. The evacuation lift will operate only in response to the car controls. The communication system provided will be in operation.
3. The lift car will be taken to the level where a wheelchair user is waiting for assistance.
4. Emergency voice communication system will be provided to enable the quick and clear identification of the locations that the wheelchair user is waiting for assistance. The communication will occur from a control point, and the information will be relayed to the person operating the evacuation lift car and to communicate with the person waiting for assistance.
5. The communication system should have a back-up power supply sufficient to operate it for the planned evacuation time, or be fed from the secondary supply.
6. At final exit level, help should be available to assist passengers from the lift to allow quick evacuation from the lift car and avoiding blockage of the escape route near the final exit.
7. If an evacuation lift fails to arrive at the required floor for any reason, evacuation should be carried out via the stairs.
8. The features and facilities of the evacuation lift will be maintained and kept up to date by the building management. Maintenance will occur as follows:
    a. The Responsible Person will keep a Health and Safety File containing a number of key documents relating to the building, including the fire strategy for the building,

O&M Manuals and this Fire Statement that identify how the building is to operate and any limitations associated with its operation.

b. The Responsible Person will have a process in place to ensure that decisions are not made without reference to key documents like the fire strategy, and uses experts to assist with decision making.

c. The Health and Safety file will be continually updated with information which will ultimately include the improved fire safety features planned for implementation.

d. As built drawings will form an important part of the file. If the building was to be redeveloped in in the future, the Health and Safety file documentation will be reviewed to inform decisions in relation to any changes to be made, and the Fire Strategy will be updated to identify the constituent elements of the building that, if modified, have the potential to adversely affect the original fire safety strategy.

Declaration of compliance by a competent person

The technical content produced for this planning application complies with all the relevant legislation and requirements of London Plan Policy D12 and D5(B5).

Signature:	Basil Jackson BEng(hons), MSc(Eng), MSc(Fire), DMS, CEng, C Build E, MICE, MIFireE, MCABE
Date:	08.07.24

REFERENCES

[1] HMGovernment. Town and Country Planning (Development Management Procedure) (England) Order 2015. HMGovernment; 2015 Part 1, Section 2, Paragraph 1
[2] HMGovernment. approved document B. Fire safety. HM Government; 2019 Para 2.41
[3] HMGovernment. approved document B. Fire safety. HM Government; 2019 Para 2.41
[4] HMGovernment. approved document B. Fire safety. HM Government; 2019 Table B4 point 6
[5] HMGovernment. Approved document B. Fire safety. HM Government; 2019 Clause 12.7
[6] Greater London Authority. London Plan Guidance Sheet Policy D12(B). Greater London Authority; undated Point 21
[7] HMGovernment. Building a Safer Future: Independent Review of Building Regulations and Fire Safety: Final Report. HMGovernment; 2018 Clause 3.36