

FAO: Miriam Baptist

17th October 2024

Planning Reference Number 2023/1357/P

Dear Miriam,

We have revised this Cover Letter with updated drawing numbers. We've tried, very hard, to submit this MMA in a valid format. We think that the attached Schedule of Changes, adequately captures all of the proposed changes. In addition, we are resubmitting this Cover Letter, which explains in more detail than we could put on drawings or schedule, the changes to the services, staircase and landings, which cumulatively which led us to changes in the Roof Terrace access and width. (Schedule Item 7, 8, 9, 12, 13, 14, 15).

Please note, that we have attached the requested Acoustic Impact (re)Assessment regarding the relocation of Unit 7 ASHP (Schedule Item 10).

The 'as approved' scheme shows a centrally located access onto the roof terrace. We have since discovered that we cannot deliver a compliant scheme (Building Regulations, Fire Regulations and Minimum Space Standards) with a centrally located access to the terrace.

This was largely, but not exclusively, because of the following:

- The approved scheme was not fire regulations compliant;
- The staircase was technically undeliverable (the last architect was replaced as a result) and, in any event, was not compliant with building regulations;

Below we've provided more detail on those challenges. We have had to massively redesign the scheme to comply with the approved drawings AND building regulations.

Part B - Fire - Building Regulations - Approved Document B (fire safety)

- Non-compliant Staircase** - The common staircase within the 'As Approved' Design was not wide enough, falling short of Building Regulations Requirements. This has been addressed in the new design. The stair width is now 1000mm wide (excluding handrails).
 - 3.60** *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.*

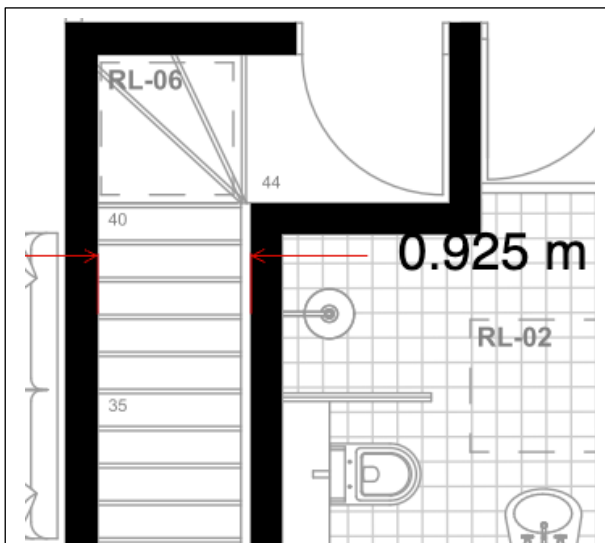


Image 1 - Approved Scheme – Staircase Width

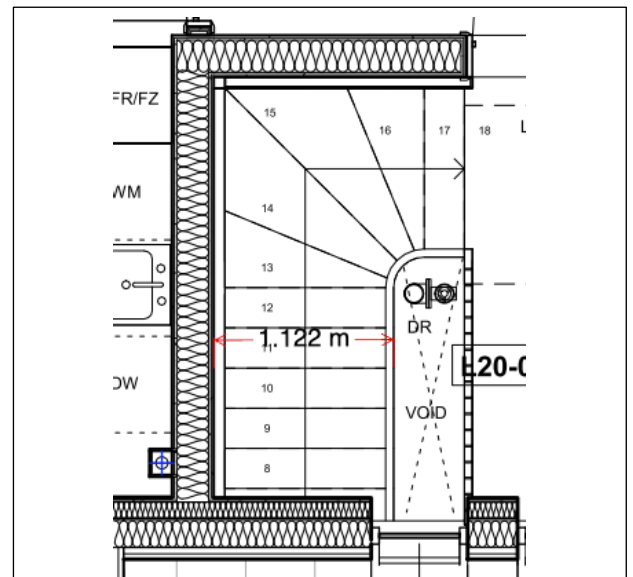
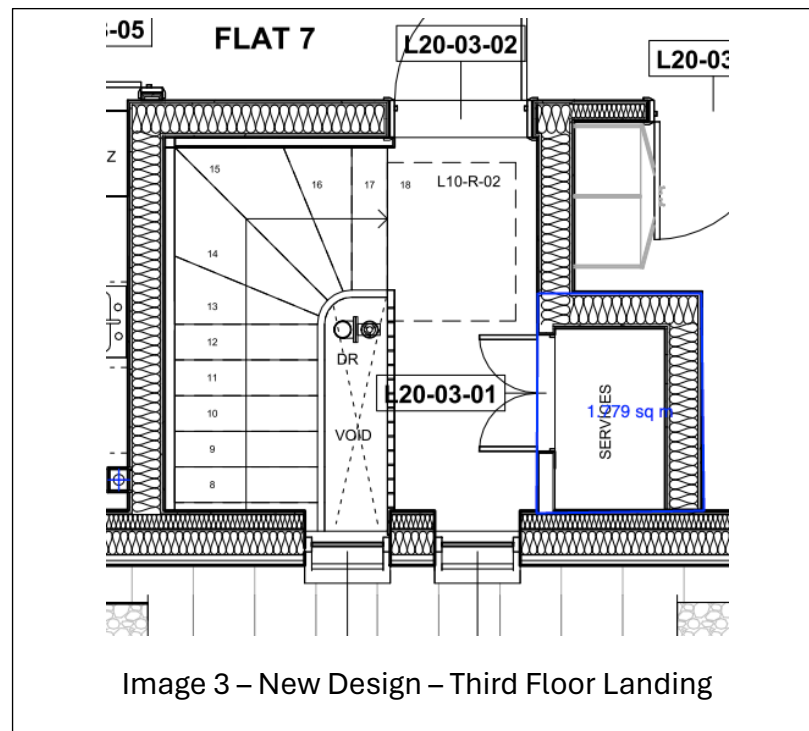


Image 2 – New Design – Staircase Width

- Inclusion of a Dry Riser we did not have in the approved scheme** – Refer to Image 3
 - 13.2** *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 in accordance with paragraphs 13.5 and 13.6.*

- **Inclusion of Protected Shafts**

- **7.21** Stairs and service shafts connecting compartments should be protected to restrict the spread of fire between the compartments. These are called protected shafts. Walls or floors surrounding a protected shaft are considered to be compartment walls or compartment floors.
- **7.22** Any stair or other shaft passing directly from one compartment to another should be enclosed in a protected shaft. Protected shafts should be used for the following only, but may also include sanitary accommodation and washrooms. a. Stairs. b. Lifts. c. Escalators. d. Chutes. e. Ducts. f. Pipes. g. Additional provisions apply for both of the following. i. Protected shafts that are protected stairways: Sections 2 to 4. ii. Stairs that are also firefighting stairs: Section 15.>????



Part K - Stairs and Ladders - Building Regulations - Approved Document K

- Rise and Going to the communal stairs were not compliant. Risers have been made smaller and the going has been increased, resulting in additional stairs. Please refer to Images 4 and 5.
 - **1.3** In a flight of steps, for all steps use the measurements for rise and going given for the three stair categories in Table 1.1. Use any rise between the minimum and maximum with any going between the minimum and maximum, that complies with the relevant note contained in table 1.1.

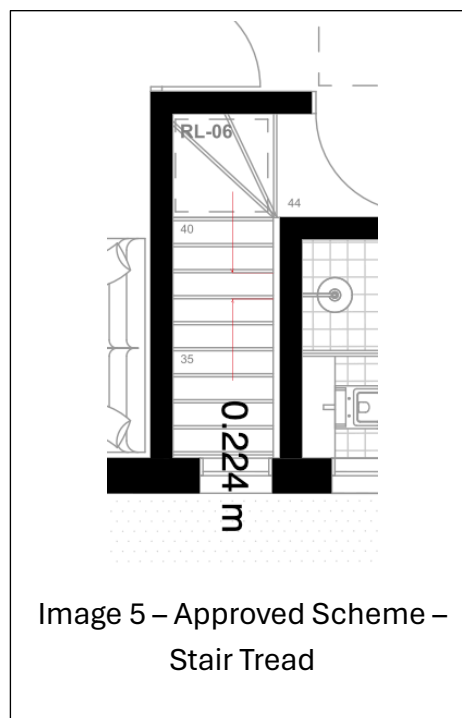
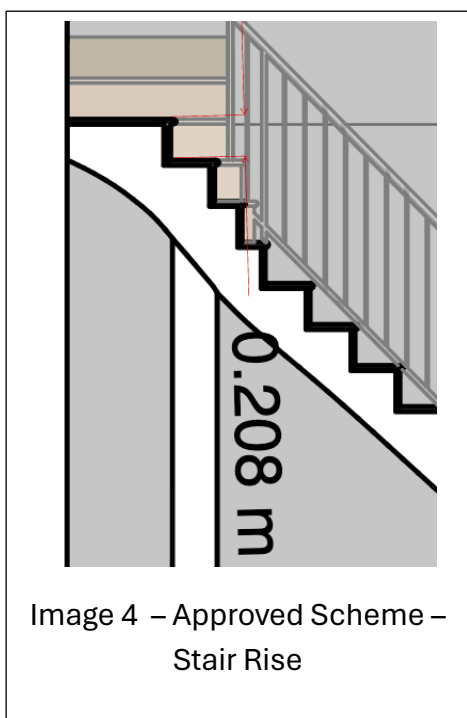


Table 1.1 Rise and going

	Rise*		Going*	
	Minimum (mm)	Maximum (mm)	Minimum (mm)	Maximum (mm)
Private stair ^{1, 2}	150	220	220	300
Utility stair	150	190	250	400
General access stair ³	150	170	250	400

Notes:

[1] The maximum pitch for a private stair is 42°.

[2] For dwellings, for external tapered steps and stairs that are part of the building the going of each step should be a minimum of 280mm.

[3] For school buildings, the preferred going is 280mm and rise is 150mm.

* The normal relationship between the dimensions of the rise and going is: twice the rise plus the going (2R + G) equals between 550mm and 700mm.

For existing buildings the dimensional requirements in Table 1.1 should be followed, unless due to dimensional constraints it is not possible. Any alternative proposal should be agreed with the relevant building control body and included in an access strategy (refer to Approved Document M).

- Stair widths were not compliant. Please refer to Image 1
 - **1.15** For flights of stairs, provide all of the following:
 1. A minimum width between handrails of 1000mm.

The 'as proposed' scheme, with the revised layouts (drawings):

- P-03-20-004 - Rev O,
- P-R-20-005-Rev J
- E-F/R-20-006 - Rev L
- E-N/S-20-007 - Rev H

is now compliant across all these regulations (Building Regulation, Fire Regulations and Minimum Space Standards).

General Comments

- The 'as approved' scheme was not providing access to the communal services riser for maintenance purposes at GF
- The stair arrangement at 3rd floor did not allow the continuation of the communal services risers into the top floor.
- Communal services risers had to be relocated to be accessed from communal areas for maintenance purposes.
- 3rd floor had no provision for communal services riser access
- The Unit-07 ASHP needed to be relocated from the plant area, to ensure that it functions as required and meets the standards set out in our Energy and Sustainability statement V x (approved). The most logical place to put that ASHP, given air-circulation and maintenance requirements, in the centralised location on the rear elevation at 3rd floor.

In conclusion

The architects with whom we designed the building made a catalogue of errors. We asked them to certify in writing again and again that their design was compliant and technically deliverable. They swore it was but at the beginning of this year when we set about delivering the building we discovered how badly they had screwed up. As developers we take responsibility for that. We fired them and appointed our new architects, who have done excellent work in rationalising the scheme. The staircase, communal areas and service voids had to grow. That swallowed up one of the bathrooms at 3rd floor level and threatened the minimum space standard (+storage) requirements for that flat. The utility cupboard in the internal corridor had to grow. Those two changes, taken together, make the centralised access to the terrace impossible.

The reason that we've gone into detail explaining the design challenges we've faced (and overcome) is to show you that we've done our best to balance a multitude of immovable items: Fire safety, safe staircases, and the safe routing of the building's mechanical and electrical services.

The knock on effects of those changes have made it impossible to deliver a two bed apartment (which satisfies minimum space standards, building regs, windows and dormer locations and fire safety). Unless, we relocate the centralised access to the terrace to the side(s).

The terrace has been approved by the London Fire Brigade, under our fire safety strategy proposal, as a satisfactory 'secondary means of escape'. Our fire safety consultant has added that having a second exit to the 'secondary means of escape' is a good thing.

We are of the opinion that the rear elevation will be the least impacted by the equally distributed dual access proposed. Otherwise, the apex of the building will appear lopsided. Following your email dated 7th October 2024, we have revised the railings in line with your point 6.

As ever, please feel free to get in touch if you want to discuss anything.

Yours sincerely,

Ed and Bill at Rare Origins