Fire Statement compliant with Policy D12(A)



- Site: 1 Hurdwick Place
- Address: 1 Hurdwick Place, Camden, London NW1 2JE
- Client: Idlehurst Asset Management

Date	Status	Version	Subject	Author
26/06/2023	Final	2.0	Fire Statement	Gary Ferrand MA EngTech FIFireE MIFSM Principal Fire Consultant



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Section 1 – Executive Summary

This document relates to the proposed development at 1 Hurdwick Place, Camden which involves the construction of seven self-contained apartments over 5 floors (Basement and Ground to Third Floor). The construction will include associated cycle and refuse storage at Ground Floor.

The development is accessed only from Hurdwick Place.

The London Plan Guidance Sheet Policy D12 defines a major development by virtue of it meeting the following criteria;

- For dwellings: where 10 or more are to be constructed (or if number not given, area is more than 0.5 hectares).
- For all other uses: where the floor space will be 1,000m² or more (or the site area is 1 hectare or more). The site area is that directly involved in some aspect of the development. Floor space is defined as the sum of floor area within the building measured externally to the external wall faces at each level. Basement car parks, rooftop plant rooms, caretakers' flats etc. should be included in the floor space figure.

This proposed site is not a major development, the London Borough of Camden has requested that the new proposal should demonstrate how it responds to, and contains information on, the requirements of part A of London Plan Policy D12 (Fire Safety).

Policy D12 and its associated guidance specify that the highest standards of Fire Safety are expected for major developments, and the guidance explains how to clearly demonstrate that such expectations have been achieved in support of a planning application. The Guidance Sheet in support of the Policy states;

"A Fire Statement is a standalone document which defines the fire safety objectives and performance requirements of a development, and the methods by which these objectives will be provided/ satisfied. The Fire Statement should evidence the provisions made for the safety of occupants and protection of property as well as the provision of suitable access and equipment for firefighting in light of London Plan fire safety policy guidance and the justification for these measures."

This document is not a design fire strategy and is intended only to summarise the standard of Fire Safety provisions for the application in accordance with Policy D12 and the associated guidance.

1.1 Name of Contacts

Risha Patel – GAA Design.

1.2 Documents Reviewed

The following documents were provided by GAA Design in support of this Fire Statement;



Document description	Date	Provided by
Site and Block Plan	21/10/2022	GAA Design
Proposed Floor Plans (Basement, First, Second and Third)	27/03/2023	GAA Design
Proposed Floor Plan (Ground)	27/03/2023	GAA Design
Proposed Roof Plan	27/03/2023	GAA Design
Proposed Elevations	14/06/2022	GAA Design

Section 2 – Property Description

2.1 Description

1 Hurdwick Place is a proposed (wholly) residential development within an existing mixed-use building. The existing building comprises a commercial unit occupying the ground floor and basement, and separate residential apartments occupying the upper floors.

The proposal will result in adaptations to all floors for the purpose of creating a residential property with one common stairway to serve all floors. The adaptations and extension will result in the following;

- Basement Flat 1 (61m²) accessed externally via independent entrance and Flat 2 (44m²) accessed via the internal common stairway;
- Ground Main entrance serving flats 3-9, Flat 3 (81m²) accessed via its own independent entrance or from the common lobby, an internal common stairway, a refuse store (5m²) and a bicycle store (8m²) both accessed from a ventilated lobby;
- First floor Flat 4 (46m²) and Flat 5 (67m²) accessed via a common lobby and an internal common stairway;
- Second floor Flat 6 (77m²) accessed via a common lobby and an internal common stairway; and
- Third floor Flat 7 (79m²) accessed via a common lobby and an internal common stairway.

The proposed adaptations will result in all apartments with habitable rooms accessed from an internal protected hallway.

There will be no additional car parking provision or shared external amenity spaces.



2.2 Site Plan



Figure 1 - Site Plan showing the footprint of the site hatched in red, the likely FRS RVP and the location of the nearest public hydrant (H – denotes single hydrant).



Section 3 – Policy D12(A)

The headings within this Section respond to Part D12(A) of the London Plan. The guidance gives this part the title of 'Planning Fire Safety Strategy' (PFSS). All building developments in London must produce a PFSS for their planning applications and all development proposals must achieve the highest standards of fire safety.

A.1 Identify suitably positioned unobstructed outside space: a) for fire appliances to be positioned on b) appropriate for use as an evacuation assembly point.

On approaching the site, access will be gained from Hurdwick Place, the bus-bay at the front elevation will be the likely Rendezvous Point (RVP) for the Fire & Rescue Service.



Figure 2 - Block Plan showing the location of the FRS appliance and the hose laying route from the pump-bay to the main entrance of the property – approximately 8m.

- a) The FRS appliance (as shown above) will be able to park immediately outside the property. This allows an unobstructed hose-laying route from the pump-bay of the parked fire appliance to the main entrance measuring approximately 8m. The building layout (as proposed) will provide access for a pumping appliance to within 45m of all points inside each flat (measured along the route of the hose).
- b) Having evacuated from an apartment, the occupants can evacuate the building via the main entrance to a place of ultimate safety at the front of the property. Such that their location will not impede the firefighters from accessing the main entrance of the block in preparation for tackling the fire.

There will be no designated assembly point for the apartments as the evacuation strategy will be Stay Put. This will be made known within the resident handbook for those occupying the new apartment.



A.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.

The proposed development will provide inherent safety standards by virtue of the high level of compartmentation provided within the development. The new apartments will form their own compartment. Each compartment will be separated by materials providing a minimum fire resistance of REI 60. There will be no ducting, pipework or cabling which penetrates the compartment walls and floors without being sufficiently fire-stopped at the junction, any firestopping will provide at least the same level of fire resistance as the wall or floor it penetrates.

All apartments will be provided with fire detection and alarm systems (Category LD1 coverage), a system incorporating detection in the circulation areas and all risk rooms, and will meet the requirements of; BS 5839-6:2019 – 'Code of practice for the design, installation, commissioning and maintenance of fire detection and fire alarm systems in domestic buildings'.

The height of the Third Floor (the highest habitable floor) will not exceed 11m (10.41m from the FRS access level) and the apartments will therefore not be fitted with an automatic water fire suppression system.

The entrance door to each apartment will be fire-resisting and self-closing, and will meet the FD30S specification. The common stairway and lobbies serving the apartments will achieve a minimum fire rating of REI 60, the doors will meet the FD30S self-closing specification. The newly created internal hallway/lobby within each apartment will achieve REI 30 and will have FD20S doors installed to the habitable rooms (not required for WC/Bathrooms).

Each protected common lobby serving the apartments will not be ventilated and will not have a total travel distance exceeding 4.5m.

The common stairway will be ventilated with either of the following methods;

- A high-level openable vent with a free area of at least 1m² at each storey, or
- A single openable vent with a free area of at least 1m² at the head of the stair, operable remotely at the fire and rescue service access level.

An emergency lighting system will be installed throughout the common escape routes, this system will confirm to BS 5266-1.

It is essential that the fire protection measures integrated into the buildings function in a fire situation. Consequently, the provided fire protection measures will be inspected on a regular basis to ensure that they are available and functional at all times. Inspections will include, but not necessarily be limited to, the following;

a) escape routes will be kept clear at all times;



- b) whenever services breach compartment walls or floors, the integrity of fire separation will be maintained through the use of appropriate fire-resisting materials in spaces where breaches of compartmentation have occurred;
- c) all fire safety equipment (e.g. the fire alarm system and emergency lighting system) will be maintained and tested in accordance with the relevant standards by a competent person;
- d) the lobby doors separating the stairway will be maintained as operational and in good condition with all components working adequately (the responsibility of the Duty Holder; the landlord or managing agent); and
- e) the flat entrance doors and the internal fire doors (the hallways separating the habitable rooms) will be maintained as operational and in good condition with all components working adequately (the responsibility of the new apartment occupant).

The ongoing control over the repair, maintenance and replacement of doors, alarms and any other fire safety equipment within the common areas will be effectively planned, monitored and reviewed by the responsible person.

Any changes, additions or adaptations to any of the active and passive measures at this development should not be undertaken without the prior involvement of a competent person.

A.3 Are constructed in an appropriate way to minimise the risk of fire spread.

The design and construction of the refurbishment will meet the requirements of the Building Regulations 2010 and the supporting guidance.

The construction of the new apartments will not adversely impact on the fire safety of any occupied apartments sharing the single means of escape, meaning, the means of escape will be maintained as available throughout the construction period and there will be no attachments or hazards in locations which promote fire spread to neighbouring properties.

Space separation

There will be no new openings or unprotected areas at any elevation which create a hazard for adjacent properties.

The refurbished property will not result in a height exceeding 11m. Therefore, the external façades will continue to achieve the minimum fire performance rating of Class B-s3,d2 or better, thereby, minimising any risk of external fire spread.

Construction materials

The precise detail and type of construction of the apartments was not readily available at the time of writing, but this will be confirmed following the acceptance of the planning application. However, the following detail is assumed at this stage;



- a) Roof mixture of pitched roof and flat roof, no new dormer windows. The addition of one Automatic Opening Vent (AOV) shown on the Roof plan.
- b) New or adapted external wall systems assumed to achieve a fire performance rating of Class Bs3,d2 or better - to be confirmed by the designer.

The same rating will apply to all 'specified attachments' at this property, including any additional features such as solar PV panels at roof level, which have not been confirmed at the time of the application.

To reduce the potential for fire spread, cavity barriers will be provided for both of the following;

- a) To divide cavities
- b) To close the edges of cavities.

The new compartments (external wall junction of each apartment and the common stairway/lobbies) may have cavities and concealed spaces which will need to be separated in accordance with sections 5.16 to 5.24 of the Approved Document B, Volume 1:2019 (incorporating the 2020 and 2022 amendments).

Refuse and Bicycle stores

The refuse store and bicycle store at ground floor level will be separated from the single stairway by a ventilated and protected lobby. The entrance to Flat 3 within this lobby will not compromise the primary escape route from this Flat, as the principle means of escape will be the normal access route to the final exit opening onto Hurdwick Place. The ventilated lobby will comprise one of the following methods of smoke control;

- a) 0.4m² (minimum size) of permanent ventilation; or
- b) a mechanical smoke ventilation system.

Both the refuse store and the bicycle store will be constructed with materials affording a minimum fire resistance of REI 60 and each will have a roller shutter door achieving the minimum specification of FD30S or equivalent.

Where walls, screens or partitions are constructed they will meet the recommendations set out in the British Gypsum's 'White Book', or a recognised equivalent standard.

Surface linings

The internal linings within circulation spaces within the apartments should either conform to Class 1 surface spread of flame in accordance with BS 476-7, when tested in accordance with BS 476-6, or conform to Class C-s3,d2 when tested in accordance with BS EN 13501-1.

The internal linings within other circulation spaces, including the common areas, should meet Class 0 (national) or Class B-s3,d2 (European).

All construction detail and materials will be retained digitally by the client, and this will form the O&M manual which will be stored and shared digitally in order to satisfy the principles of the 'Golden Thread'.



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

Each residential apartment within this property will be designed to operate a 'stay put' evacuation strategy.

In the event of a fire in any apartment, it is not expected that an occupant in the apartments adjacent or below will be required to evacuate due to the high level of protection provided.

The Approved Document B and BS9991:2015 recommend that a protected internal hallway should be provided within apartments and this should lead to all habitable rooms. As such, the hallways within the new apartments have a travel distance not exceeding 9m from the flat entrance door to the door of any habitable room.

The Stay Put strategy is considered to be an inclusive and appropriate strategy for people with disabilities including mobility, sensory and/or cognitive disabilities. If occupants need to evacuate then the route toward the main entrance will be via either common stairway, or will be the main entrance for Flat 3.

The leaseholder/owner of each new apartment will be advised to develop a personal emergency evacuation plan (PEEP) for any occupant who is known to be unable to self-evacuate.

The means of escape will be accessible to persons who do not have a good understanding of the English language as all signage will meet the recommendations of BS 5499-4:2013 – *'Code of practice for escape route signing'* and will take the form of pictorial symbols wherever necessary.

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

The evacuation strategy as described above is Stay Put.

For those within the dwelling of origin (any new apartment), where they have discovered a fire or where the fire alarm system has activated, will commence evacuation immediately to a place of ultimate safety (fresh air). The internal route to an apartment door does not need to be indicated with signage.

Where it is known that persons will be unable to self-evacuate from any new apartment then a proposed evacuation strategy will be developed and tailored to suit their requirements. This may include additional assistance equipment and will almost certainly require at least one person to accompany the individual to a place of safety.

The evacuation strategy will be made known to all existing and new occupants and will be displayed on the fire action notices provided throughout the common means of escape.

The evacuation strategy is not a fixed or permanent approach and may change as the building is adapted or where additional risks are identified. As such, there should be periodic reviews of the evacuation strategy throughout the lifecycle of the property.



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

The occupants of the apartments may wish to supply their own portable extinguishers to tackle small fires within their domestic environment, but this is not required by legislation or mandatory guidance.

If the Fire & Rescue Service arrive on site to tackle a fire, they will be able to augment their water supply from one of the nearest public fire hydrants. Figure 1 shows the location of the nearest water supply.

Section A1 above describes the 'access' route and parking location for the fire and rescue service. This route and the parking location will not adversely impact the neighbouring sites and will be made available throughout the period of the construction and throughout the lifespan of the development as it is proposed.

The following firefighting facilities will be provided;

- a) One OV at the head of the stairway with a free area of at least 1m², operable remotely at the fire and rescue service access level or a high-level vent at each level within the stairway.
- b) To assist the Fire & Rescue Service to identify each floor the block will be fitted with floor identification signs and flat indicator signs. These signs will conform to Paragraphs 15.13-15.16 of the Approved Document B, Volume 1:2019 (as amended). This to be provided despite the uppermost floor level not exceeding 11m in height.

Throughout the construction phase, the developer will employ contractors and sub-contractors who may be engaged in hot works or general construction. Throughout this period, they will have a duty under the CDM Regulations 2015 to prevent the risk of fire and fire spread. They will discharge this duty by providing a means to tackle a small fire to prevent it becoming a large or developing fire. An appropriate number of contractors will be trained in the selection and use of fire extinguishers. The construction of the upper floors will not adversely impact on the means of escape for those occupying the lower floors.

The preceding information and confirmation would mean that this development would be compliant with the London Plan Policy D12(A).



Section 4 – Details of the Author

This Fire Statement has been produced by Gary Ferrand MA EngTech FIFireE MIFSM who is a Principal Fire Safety Consultant and is a "third-party independent and qualified" individual.

He holds the EngTech qualification with the Engineering Council and is accredited by the Institution of Fire Engineers and has relevant and extensive experience in fire safety. He is a competent professional with the demonstrable experience to address the complexity of the design being proposed at this development.

Membership, Qualifications and Career details:

<u>Grade of IFE membership:</u> IFE Membership Grade: Fellow – present. 1994-2011 Year of gaining IFE Fire Risk Assessor (Life Safety) accreditation: 2020 Member of the Institute of Fire Safety Managers Member of the Fire Protection Association

Qualifications: MA (University of Exeter) 2005 Safety for Executives (IOSH) 2009 NEBOSH Diploma (IOSH) 1998 Modules A-D FSOC Fire Safety Studies (Fire Service College) 2005 Executive Leadership Programme (Warwick Business School) 2010 Incident Command Management – accredited at Level 4, 2011 Incident Command Gold Command 2010-2016 Multi Agency Gold Incident Course (MAGIC) 2012

Career details:

The author has spent 30 years enforcing fire safety legislation in different Fire & Rescue Authorities. As a Principal Officer he led the NFCC Business Safety Group to consistently apply enforcement work across all FRAs in the UK. He has worked privately as a consultant with large and medium-sized clients working on small, medium, large and bespoke complex developments over the previous 6 years. He is a Fellow of the IFE and has been recognised formally by the NFCC (previously CFOA) for his contribution to fire safety.