ORIONFIRE
ENGINEERING

LONDON POLICY D12(B) and D5B(5)
FIRE STATEMENT

PROJECT NAME: 14 Blackburn Road. London

DATE: 1st April 2025

REF: OF-001587-LPS-01-A

Quality Assurance

Rev	Date	Prepared By	Authorised By	Comments
-	15/03/2025	Hugh Foster	Francis Lee/ Ben Cooper	For Information
A	01/04/2025	Hugh Foster	Francis Lee/ Ben Cooper	Updated following design team comments

1 Introduction

Project Brief

1.1.1 Orion Fire Engineering (Orion) have been appointed by Hampstead Asset Management Ltd and Fifth State to produce a London Plan Fire Statement for the proposed development 14 Blackburn Road, NW6 1RZ in London to demonstrate compliance with the London Plan 2021.

London Plan Policy D12 Requirements

1.1.2 The London Plan Policy D12 requires all proposed developments to offer the highest standards of fire safety and ensure the safety of all building occupants. Within the London Plan Policy D12, Sections A1 – A6 apply to all developments within the Greater London Area. Sections B1 – B6 apply to major developments within the Greater London Area.

1.1.3 Major Developments are defined as:

- 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 1000 square metres or more (or the site area is 1 hectare or more).

1.1.4 This proposed development is classified as a major development and as such Sections B1 – B6 apply. The relevant sections of Policy D12 and the requirements of each section have been summarised below in Table 1.

Table 1: Greater London Authority Requirements

D12 Section	Requirement
B1	The building's construction method and products and materials used.
B2	Means of escape for all building users and evacuation strategy.
B3	Passive and active fire safety measures.
B4	Access and facilities for the fire and rescue service.
B5	Site access for the fire and rescue service
B6	Future development of the asset and the 'Golden Thread' of information

1.1.5 The recommendations of Policy D12 of the London Plan 2021 (set-out in Clause 3.12.1 – 3.12.11 of the London Plan 2021), have also been considered in the formation of this report.

London Plan Policy D5(B5)

1.1.6 Additionally, the London Plan Policy D5 has also been considered, which has been reflected in the adoption of the evacuation lifts.

Prescriptive Guidance Documents

1.1.7 The fire safety design for the residential buildings will be assessed against the recommendations of BS 9991:2024. The recommendations made within this statement are based upon the recommendations given within BS 9991 however various supporting British Standards have also been used where referenced. The latest standards for external fire spread will be incorporated into the design, these taken from Approved Document B Volume 1:2019 incorporating 2020 and 2022 Amendments.

1.1.8 BS 9999:2017 has been used to comment on the non-residential areas of the development.

1.1.9 It should be highlighted that this statement does not constitute a holistic fire strategy for the building, suitable to demonstrate compliance with Part B1 to B5 of the Building Regulations or for approval from an Authority Having Jurisdiction (AHJ). The statement is merely to provide an overview of the fire safety features provided for the purposes of supporting the planning application and meeting the London Planning Policy D12(B) and Policy D5(B5).

1.1.10 Where the proposed development contains a variation from the recommendations of the prescriptive guidance, a fire engineered approach will be adopted to demonstrate that the proposed development (where applicable), can achieve compliance with the functional requirements of Building Regulations.

Site and Building Description

1.1.11 The proposed development proposes "the demolition and redevelopment of the Site for a mixed-use development comprising purpose-built student accommodation (Sui Generis), affordable housing (Use Class C3), lower ground and ground floor flexible commercial/business space comprising of showrooms, retail and ancillary offices (Use Class E/Sui Generis) and a café/PBSA amenity space (Use Class E/Sui Generis) and associated works including service yard, cycle parking, hard and soft landscaping, amenity spaces and plant." ('the proposed development').

1.1.12 The proposed development comprises of two distinct buildings that are linked at ground level. The C3 building will be 4-7 storeys including a taller ground floor and the PBSA building will be 10 storeys including a ground floor and amenity mezzanine level. There is a double height space spanning these lower two floors in the café at the base of the PBSA.

1.1.13 The proposed development would deliver:

- 192 purpose-built student accommodation rooms (Sui Generis),
- 35 affordable homes (C3) and,
- 1,619m^2 of lower ground and ground floor commercial floorspace to include:
- a new and enhanced flexible commercial/business space (Use Class E/Sui Generis) for the Builders Depot, comprising of show rooms, retail space and ancillary offices and an internal service yard accessed from Blackburn Road. This space is capable of being subdivided to allow for future flexibility.
- a publicly accessible ground floor café at the base of the PBSA (Use Class E/Sui Generis)."

1.1.14 One residential building is an affordable housing block (Block C3) with a basement and ground plus six storeys. The top storey height is 24.8m. The block has an internal area of ~800m^2 and is served by two stairs, one of which will be part of a firefighting shaft.

1.1.15 The second residential building is purpose-built student accommodation (PBSA block). This building connects from Basement to Level 08 with a mezzanine level above ground floor. The top storey height to Level 08 is 28.5m. At ground floor the amenity spaces which includes a entrance foyer and cafe and work space plus ancillary spaces such as bin stores. At mezzanine level there is amenity space. Additional plant

and bike stores are located at basement level. The building has a footprint of ~780m^2 and is served by two stairs, one of which will be part of a firefighting shaft.

1.1.16 At basement and ground floor a Class E flexible commercial/business space will be provided for the Builders Depot that includes show rooms, retail space and ancillary offices. This also includes a service yard accessed from Blackburn Road.

1.1.17 The site is predominantly accessed by Blackburn Road with the south elevation adjacent the West Hampstead Underground Railway Station.

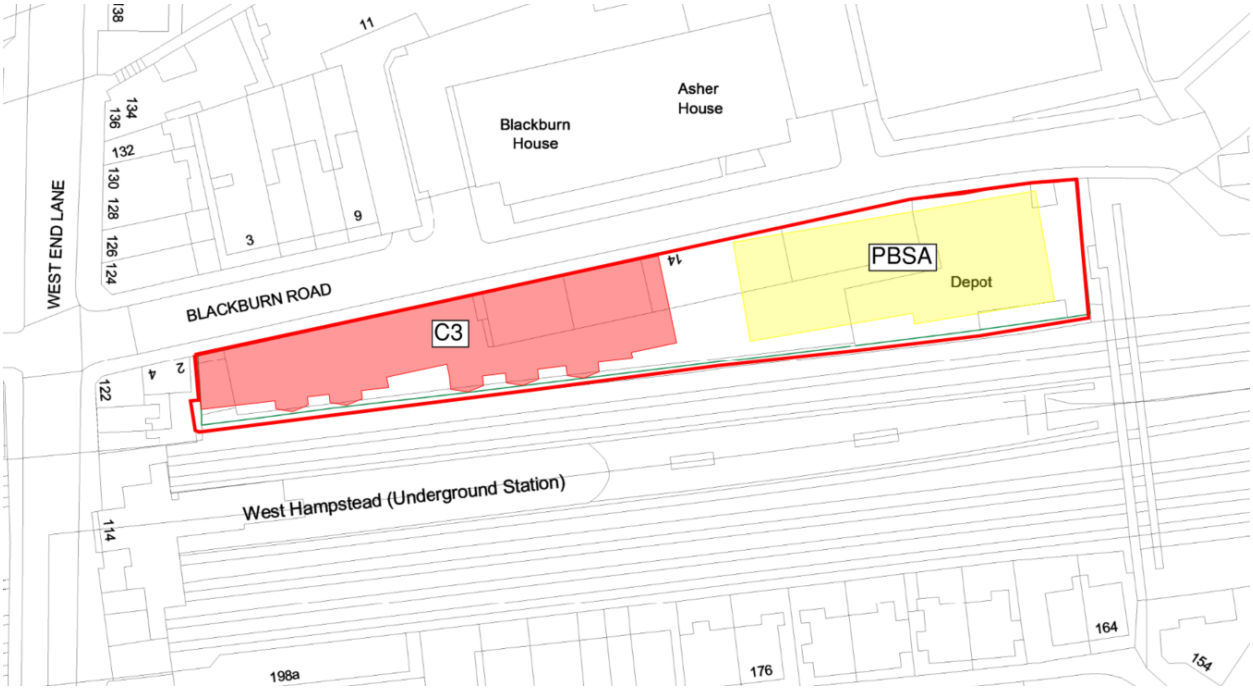

Figure 1: Site Location

Figure 2: Section Drawing

1.1.18 Ancillary areas of Block C3 and the PBSA Block are to be accessible to residents only. Plant areas will be accessible to building management and maintenance workers only.

1.1.19 A Café at ground floor level will be accessible by members of the public.

1.1.20 Note, the commercial unit at basement and ground floor to be designed as “shell and core” and will be subject to a separate Building Regulations application and fit out by the tenant. For the purposes of this document, shell and core requirements will be listed which will need to be adhered to.

1.1.21 The London Plan covers non-residential buildings in part however, limited information is available at the time of completing this report (shell and core) therefore, the commercial unit would be subject to fit out and a separate Building Regulations application. The fundamental requirements are considered as part of the fire statement, but the commercial areas will be detailed under a separate fire strategy.

Project Information

1.1.22 The drawing information listed in Table 1 has been reviewed whilst producing this report. Any information not listed in this table has not been reviewed by Orion. All recommendations made within this report are based on the drawings listed below. Any revisions to those drawings may invalidate this report.

Table 2: Drawing Information Reviewed

Produced By	Drawing Number	Drawing Title	Revision
HTA	FST-BRC-HTA-C3-01-SK-A-0223-C3	Level 01-GA Plan	PL1
	FST-BRC-HTA-C3-02-SK-A-0224-C3	Level 02-GA Plan	PL1
	FST-BRC-HTA-C3-03-SK-A-0225-C3	Level 03-GA Plan	PL1
	FST-BRC-HTA-C3-04-SK-A-0226-C3	Level 04-GA Plan	PL1
	FST-BRC-HTA-C3-05-SK-A-0227-C3	Level 05-GA Plan	PL1
	FST-BRC-HTA-C3-06-SK-A-0228-C3	Level 06-GA Plan	PL1
	FST-BRC-HTA-C3-RF-SK-A-0229-C3	Level-GA Plan	PL1
	FST-BRC-HTA-PB-01-SK-A-0233-PBSA	Level 01-GA Plan	PL1
	FST-BRC-HTA-PB-02-SK-A-0234-PBSA	Level 02-GA Plan	PL1
	FST-BRC-HTA-PB-03-SK-A-0235-PBSA	Level 03-GA Plan	PL1
	FST-BRC-HTA-PB-04-SK-A-0236-PBSA	Level 04-GA Plan	PL1
	FST-BRC-HTA-PB-05-SK-A-0237-PBSA	Level 05-GA Plan	PL1
	FST-BRC-HTA-PB-06-SK-A-0238-PBSA	Level 06-GA Plan	PL1
	FST-BRC-HTA-PB-07-SK-A-0239-PBSA	Level 07-GA Plan	PL1
	FST-BRC-HTA-PB-08-SK-A-0240-PBSA	Level 08-GA Plan	PL1
	FST-BRC-HTA-PB-RF-SK-A-0241-PBSA	Level Roof GA Plan	PL1
	FST-BRC-HTA-SC-A-0800	Accommodation Schedule	PL1
	FST-BRC-HTA-XX-00-SK-A-0200	Level 00 (Street Level)-GA Plan	PL1
	FST-BRC-HTA-XX-B-SK-A-0198	Level-GA Plan	PL1
	FST-BRC-HTA-XX-M-SK-A-0201	Level-GA Plan	PL1
	FST-BRC-HTA-XX-ZZ-SK-A-0250	A-West-East	PL1
	FST-BRC-HTA-XX-ZZ-SK-A-0251	Sections-North-South	PL1
	FST-BRC-HTA-XX-ZZ-SK-A-0280	A-0280-North Elevation	PL1
	FST-BRC-HTA-XX-ZZ-SK-A-0281	A-0281-South Elevation	PL1
	FST-BRC-HTA-XX-ZZ-SK-A-0282	East and West Elevation	PL1

Author Experience

Author

Hugh Foster

Meng (Hons) Civil Engineering
AIFireE with the Institution of Fire Engineers.
10 years' experience as a fire safety engineer
Greenford Green, Ealing

Hugh developed the fire strategy for two large residential developments on the Greenford Green site. These including residential apartments complimented by residential amenities, commercial units, a super market. Hugh assisted the scheme through the detailed design and construction stages, reviewed construction details and inspected the external wall systems during construction.

Silk Park, Hendon

Hugh delivered the fire strategy for a large residential development in Hendon London. The development consisted of 771 residential apartments split between 9 blocks wrapping and on top of a large extensively landscaped podium deck. Beneath the podium houses a supermarket food store, customer parking, residents facilities, basement residents car park and cycle storage. Private, shared ownership and social rent apartments are to be provided in the development. Hugh supported the scheme during RIBA stage 3

and 4, reviewing the scheme during detailed design, including the provision of computational fluid dynamics for residential means of escape and car park smoke clearance

Reviewer 1

Francis Lee

MSc Fire Safety Engineering.
BSc(Hons) Fire and Leadership Studies
AIFireE with the Institution of Fire Engineers.
9.5 years' experience as a fire safety engineer.

South Thamesmead Phase 2, London

Francis led the fire safety design for the proposed development of six residential blocks of flats at a time when fire safety guidance and legislation experienced intense scrutiny and significant change that presented various design challenges throughout the programme.

Broadwater Farm, London

Francis helped produce the fire safety strategy for four new residential blocks of flats, providing over 200 contemporary homes. The development also includes an eight-screen cinema and a central piazza surrounded by a mix of shops, restaurants, and bars. CFD modelling was developed to support the mechanical smoke ventilation systems used in the common corridors.

Reviewer 2

Ben Cooper

Director
MSc (Hons) Fire Safety Engineering
Beng (Hons) Fire Engineering
AIFireE with the Institution of Fire Engineers
10 years' experience as a fire safety engineer

Tolworth Tower, Tolworth

Ben supported the £300m redevelopment of the Tolworth Tower site in Tolworth, London from office accommodation into residential accommodation. After developing the fire strategy for the client, Ben continued to support the scheme throughout RIBA Stage 4 and 5, reviewing construction details and coordinating designs with the design team. In addition to supporting the design and construction of the tower refurbishment, Ben reviewed the impact that the construction works would have on the residents of the neighbouring 6 storey apartment block and provided advice to the contractor on how to programme and phase works so as not to present any undue risks to residents. Through his essential involvement during the course of the refurbishment works, Ben was appointed to support the two proposed residential towers on the site as well as review other existing buildings within the Client's portfolio.

Kelaty House, Wembley

Ben Cooper supported Watkin Jones throughout the technical design and construction of the £90m mixed use development in Wembley, consisting of 4 blocks of student accommodation and a hotel block, along with commercial units throughout the site and a basement car park. Alongside producing the fire strategy, Ben provided an analysis of the structure within the commercial units to determine a suitable fire

resistance period which would ensure that the omission of a commercial sprinkler system from the retail units did not impact on the safety of the occupants within the building.

2 Statement of Compliance

2.1.1 Based on the below provisions and the guidance Orion has given to the design team to meet the London Plan, this fire statement is considered to be in accordance with the London Plan Policy D12 and D5(B5).

2.1.2 Policy D5(B5) necessitates provision of evacuation lift per lift core however, where utility lifts are provided (such as goods lift, bike/bin lifts), then these may remain as ancillary lifts if the area they serve is adequately covered by other dedicated evacuation lifts.

2.1.3 Block C3 is provided with a firefighting stair (including a dual firefighting lift/evacuation lift) and a protected stair (including an evacuation lift)

2.1.4 The PBSA block is provided with a firefighting stair (including a firefighting lift and evacuation lift) and a protected stair (including an evacuation lift)

2.1.5 The commercial unit at basement and ground floor is provided with two evacuation lifts.

2.1.6 Orion have been appointed as Fire Engineer to provide support through the design stage of RIBA Stage 2. From RIBA Stage 3 onwards, a competent Fire Engineer should be appointed to monitor the progression of these elements and review the proposed materials, compatibility and workmanship to confirm they are fit for purpose and meet the recommendations of this report and the London Plan. The design objective for the buildings as outlined within this Fire Statement is to meet the functional requirements of the Building Regulations, with formal review by the Authority/Authorities Having Jurisdiction (AHJ) to be conducted.

3 Policy D12B(1)

Structural Fire Protection

3.1.1 The building shall be constructed with materials and be equipped with sufficient structural fire protection to meet the minimum requirements of Part B3 of the Building Regulations.

3.1.2 Both residential blocks have a top storey greater than 18m and therefore they are to have 60 minutes structural protection to all elements of structure.

3.1.3 All elements of structure supporting the firefighting shafts are to have 120 minutes structural protection.

3.1.4 The structural composition of the proposed development is concrete, where used, concrete maintains inherent fire resistance properties and is unlikely to require additional structural protection, subject to input from a structural engineer at a later stage. The fire resistance performance of this material is also less dependent on the quality of workmanship than alternative materials such as steel. This improves the reliability and robustness of the structural fire protection.

3.1.5 Compartment floors are to be present between every storey and will achieve 60 minutes fire resistance.

3.1.6 The development shall be equipped with a high degree of internal sub-compartmentation as per the relevant prescriptive fire safety guidance. This includes but is not limited to 120 minute fire rated construction enclosing life safety equipment/plant, in addition to 60 minutes fire rated compartment walls separating apartments, common corridors, protected lobbies, ancillary accommodation, plant rooms and enclosing smoke shafts.

External Wall/Roof Construction

3.1.7 As both residential blocks exceed 18m when measured from the lowest adjacent ground level to the top-most occupied floor (excluding floors which solely consist of plant), they are required to meet, in full, the requirements of Section 24.1 of BS 9991 and Regulation 7.

3.1.8 All materials used within the external walls of the development should achieve an A2-s1,d0 classification as classified to BS EN 13501 other than those exempt under Regulation 7(3) of the Building Regulations 2010.

3.1.9 The roof construction will be composed of flat roofs with access for maintenance only. All roof build-ups are to be Broof(t4).

3.1.10 Green roofs are present and additional guidance from HM Government “Fire Performance of Green Roofs and Walls” has been considered.

3.1.11 The external wall and roof build ups should be assessed by a competent fire engineer once the proposed build-ups are fully determined.

External Fire Spread

3.1.12 An initial space separation assessment has been undertaken to identify any areas within close proximity to the site boundaries. The site boundaries have been shown in Figure 3 below.

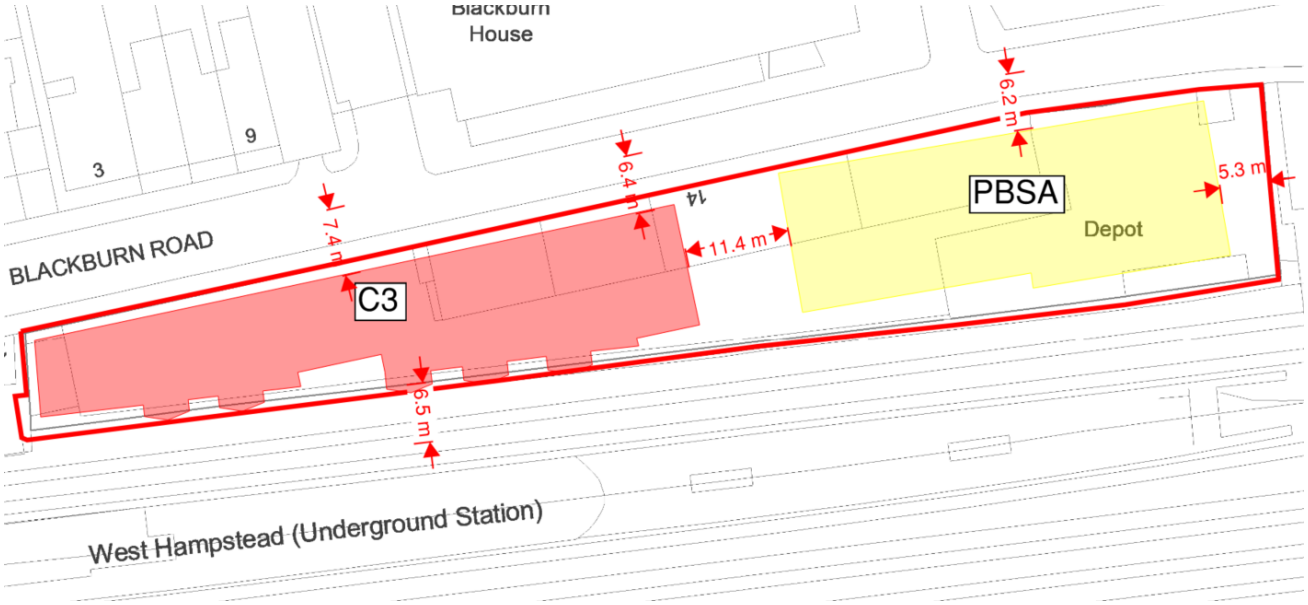

Figure 3: Elevation Key and Relevant/Notional Boundary Example

3.1.13 Where an elevation faces a public highway/railway it is possible to consider the site boundary in regard to fire spread between buildings to be the centre of the adjacent highway/railway. This is on the basis it is unlikely to be developed land. Therefore, the North elevation and the South elevation boundary distances for the calculations of fire spread have been take to the centre line of the adjacent public highway/railway. All remaining areas have been measured to the site boundary.

3.1.14 The West elevations will be fully fire protected. The North, East and South elevations will not require additional fire protection to prevent fire spread between adjacent buildings.

4 Policy D12B(2)

4.1.1 The means of escape provisions provided within the residential and residential ancillary areas of the building shall be designed in accordance with BS 9991:20124 The design shall meet the recommendations of the London Plan, subject to further development of the design at RIBA Stage 3 and 4 by the appointed fire engineer.

4.1.2 The evacuation policy for the residential areas has been based on a “stay-put” evacuation procedure. Under this evacuation procedure, only the fire alarm sounders located within the residential apartment of fire detection will sound, leading to the evacuation of that apartment alone. Egress from any apartment shall be into a protected common corridor or open deck which leads directly to a storey or a final exit. Any other occupants within the remainder of the building are not required to evacuate in the event of a fire within the residential premises. This will be subject to a management response, individual action of occupants or attending fire crews. The use of a “stay-put” evacuation strategy is a widely recognised and accepted method for residential premises in England and is supported by high degree of compartmentation between residential apartments and sprinkler protection (containing potential fire growth and spread to a single compartment).

4.1.3 As the blocks are greater than 18m to the top-most occupied storey the provision of Evacuation Alert Control and Indicating Equipment (EACIE) system should be provided as a fire safety enhancement for the building.

4.1.4 Residential ancillary accommodation will adopt a simultaneous evacuation strategy whereby upon detection activation within the ancillary accommodation, the alarm should sound throughout the ancillary accommodation specific to that block.

4.1.5 Commercial accommodation will adopt a simultaneous evacuation strategy whereby upon detection activation within that unit the alarm should sound throughout the unit.

4.1.6 Travel distances within the residential apartments of Block C3 should be limited to 20m in a single direction where sprinklers and a Category LD1 fire detection and alarm system is provided to BS 5839-6.

4.1.7 Where protected entrance hallways are provided travel distances within the hallways should not exceed 9m and the residential apartments will have a Category LD2 fire detection and alarm system to BS 5839-6.

4.1.8 Travel distances within the student apartments of the PBSA block should be limited to 20m in a single direction where sprinklers and an Category L1 fire detection and alarm system is provided to BS5839-1.

4.1.9 Travel distances from within the ancillary accommodation to final exits shall be restricted to that stated by prescriptive guidance as per BS 9991.

4.1.10 Common corridor travel distances are generally within 15m in a single direction and 45m where more than one route is available. The corridors are to be provided with a smoke ventilation system to accommodate these distances.

4.1.11 Roof top amenity, amenity spaces and ancillary spaces all have compliant travel distances.

4.1.12 The upper levels of each block are provided with means of vertical escape by way of multiple protected stairs. Each stair is to have a minimum clear width of 1100mm for downward travel, based on the current drawings.

4.1.13 Consideration of the evacuation strategy for disabled occupants is necessary to meet the requirements of Part B1 of the Building Regulations and the London Plan Policy D5(B5).

4.1.14 The design of the proposed development shall incorporate smoke ventilation systems and a high degree of compartmentation designed to maintain tenability within the shared circulation areas such that they form a place of relative safety for disabled occupants. An evacuation lift shall be provided for every protected escape stairs in the residential blocks. In the commercial units at basement and ground floor, one evacuation lift is provided to each of the two protected stairs. All evacuation lifts are to be designed to Annex G of BS 9999, EN 81-20 to meet the requirements of the London Plan Policy D5.

5 Policy D12B(3)

5.1.1 The buildings within the proposed development are to be provided with a number of passive and active life safety systems that include:

- Automatic fire alarm and detection systems are to be provided to the apartments in Block C3, and are to be designed and installed in accordance with BS 5839-6 this is to be zoned per apartment;
- Automatic fire alarm and detection systems are to be provided to the PBSA block student apartments and are to be designed and installed in accordance with BS 5839-1; this is to be zoned per studio apartment;
- Automatic fire alarm and detection systems are to be provided to residential ancillary areas and common escape routes, to be designed and installed in accordance with BS 5839-1 to an L1 standard;
- Shell and core commercial units should be provided with an interface back to the main fire alarm panel in the building and be provided with an L3 standard of fire detection and alarm until a tenant installs a full BS 5839-1 system to an L1 standard.
- Emergency Signage is to be provided as per recommendations of BS ISO 3864-1 and BS 5499-4;
- Emergency Lighting is to be provided as per the recommendations of BS 5266-1 and BS EN 1838;
- Smoke ventilation systems, proposed within corridors, service yard and basements are to be designed and installed in accordance with EN 12101 and BS 9991.
- Evacuation lifts are to comply with BS EN 81-20 and BS EN 81-70 and BS 9999.
- Firefighting lifts are to comply with BS EN 81-72 and BS 9999.
- The dry riser fire mains to be located within the residential blocks firefighting stairs and protected stairs are to be designed and installed in accordance with BS 9990.
- A number of life safety systems are to be provided with a back-up power supply where required, these are to be in accordance with their respective British and/or European Standards. Where an integrated back up supply cannot be provided, the secondary power proposals should be in accordance with BS 8519;
- Where provided, automatic fire and smoke dampers are to be provided in accordance with BS 9991 and ASFP Grey Book: Fire and smoke resisting dampers; and
- Passive fire safety systems (compartment floors, corridors, stairs, apartments, doors, firestopping etc.) classified to EN 13501-2 for loadbearing capacity (R), integrity (E) and insulation (I).
- BS 9251 Category 4 sprinkler system to be provided to Block C3 and the PBSA block.
- BS EN 12845 sprinkler system to be provided to ancillary accommodation and non-residential accommodation which is over 100m^2 in area.
- Where a place of special fire hazard is present (e.g. boiler, fuel storage, Transformer) and accessed internally, it should be separated by a protected lobby achieving 0.4m^2 permanent natural ventilation, or a suitable mechanical alternative.

5.1.2 The performance specification of these systems stated either meets or exceeds the recommendations of the relevant fire safety guidance, BS 9991 for the residential building.

5.1.3 The specification of these systems is to be developed further by the design team and fire engineer appointed for the works within the later stages of the project.

5.1.4 Where life safety systems are provided in the building (both passive and active), they should be adequately maintained by the responsible person and in accordance with the specific manufacturer recommendations and a good practice approach. All active life safety systems shall be equipped with secondary power supplies in accordance with the relevant European Standards, which shall either be an interfaced back-up battery for low power systems (e.g. alarms, access devices, emergency lighting) or a life safety generator for high power systems (e.g. Firefighting lifts, evacuation lifts, mechanical smoke ventilation system, sprinkler systems).

6 Policy D12B(4)

6.1.1 Each residential block is to be provided with 2 protected escape stairs serving the upper floors, which incorporates a 0.7m^2 aerodynamic free area at its head. One stair of each block will discharge at ground level. The firefighting shaft of Block C3 and the PBSA block will continue down to basement level. A fire door will separate the basement levels and upper levels at ground floor.

6.1.2 The firefighting stairs and the protected stairs in Block C3 and the PBSA block are each to be provided with a dry riser fire mains system.

6.1.3 The stairs serving the upper floors of Block C3 are to be separated from the accommodation by a smoke vented lobby and an open deck approach.

6.1.4 The stairs serving the upper floors of the PBSA block are to be separated from the accommodation by smoke ventilated, protected corridors/lobbies at each storey.

6.1.5 The dry rising fire mains, are to serve all floors (including ground and basement) with the inlets adjacent to the relevant stair entrance door. These inlets will be visible from the fire appliance parking locations. The dry riser outlets will be positioned within the stair enclosure on the full landing of the stair.

6.1.6 Ancillary and non-residential accommodation can be accessed via external doors, all points of the ancillary accommodation are within 45m of the fire appliance on a suitable hose-laying route.

6.1.7 Fire appliances would be able to park along Blackburn Road adjacent the proposed development.

6.1.8 Where a fire appliance needs to access the building via a dead-end access road, it should be ensured that the overall reversing distance does not exceed 20m.

6.1.9 The maximum hose laying distance from a fire mains outlet within the firefighting stair of each block to any internal location on the floorplate is to be within 60m for these sprinklered buildings as per BS 9991.

6.1.10 In order to assist the attending fire crews in obtaining the correct information efficiently upon arrival on site, it is advisable that the end-user/responsible person provides a Fire Service Premise Information Box for the apartment block to assist the Fire Service. This should be located adjacent or in close proximity to the entrance of each Firefighting shaft of each block most likely used by the attending fire crews. The most suitable location is to be discussed with local Fire Service.

6.1.11 To assist the fire service to identify each floor in Block C3 and the PBSA block, wayfinding floor identification signs and apartment indicator signs should be provided.

6.1.12 There are existing hydrants within 90m of the development located on Blackburn Road and the junction of West End Lane and Blackburn Road and these have been confirmed by the local fire service and shown in Figure 5 below.

6.1.13 Flow rates and operational status of existing local hydrants are to be confirmed by the design team.

7 Policy D12B(5)

7.1.1 There is expected to be low numbers of occupants evacuating within the residential areas due to the 'stay-put' evacuation procedure, however in the event of a full evacuation of any Block, there should be a suitable evacuation assembly point. There are landscaped areas around the buildings where occupants evacuating may congregate. However, the area highlighted below in could be for full occupancy of all buildings but there is scope for intermediate/lower occupancy assembly points on site.

7.1.2 An evacuation assembly point (EAP) for the site should be appropriate for persons evacuating from all blocks. A possible location should be confirmed under a fire risk assessment at handover stage and would be decided by the Responsible Person.

7.1.3 Orion has reviewed the fire service access provisions to the site, all roads appear existing and are not affected by the proposed works and access to the fire mains inlet points for all blocks is possible within 18m of the parking for a pump appliance irrespective of the parking bays/landscaping. It is therefore considered to meet the functional requirements of Part B5 of the Building Regulations 2010, with amendments.

7.1.4 Vehicle access to the site is available, as shown in Figure 4.

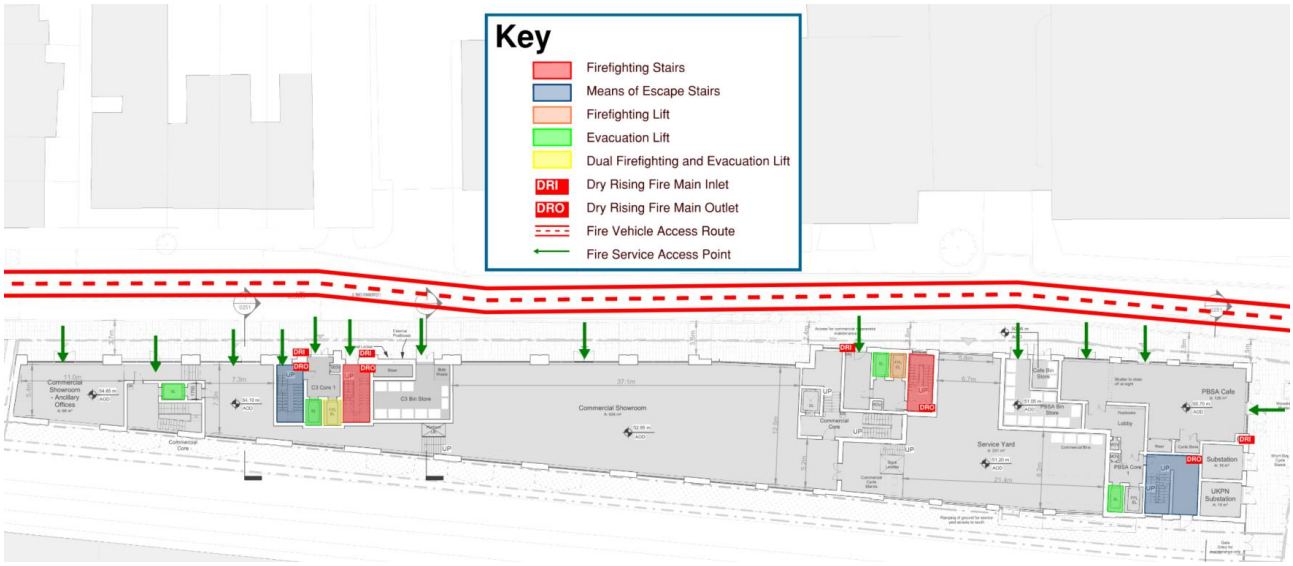

Figure 4: Fire Service Access Route

7.1.5 The existing roadway allows for typical fire service pump appliances to reach the fire mains inlet connections for each block within 18m from the parking position.

7.1.6 There are existing hydrants within 90m of the development located on Blackburn Road and West End Lane as shown on the site plan. Flow rates and operational status of existing local hydrants are to be confirmed.

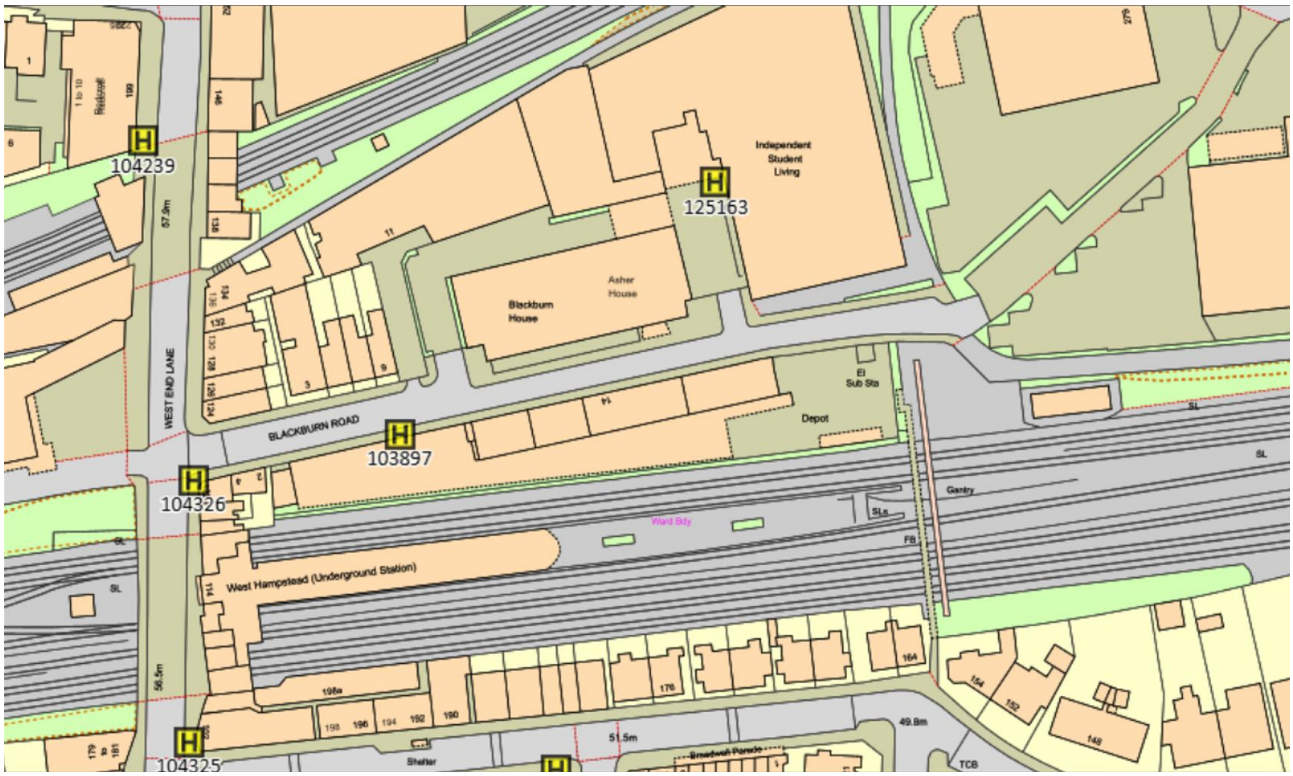

Figure 5: Fire Hydrant Locations

8 Policy D12B(6)

8.1.1 Any future changes or modifications to the building are to take account of the fire strategy for the building and this should be monitored and developed as the scheme continues to progress to maintain full adherence to the guidance available and legislative requirements of the Building Regulations and the London Plan.

8.1.2 If the building/scheme is to undergo a "Change of Use", this will automatically trigger the need for a new Building Regulations application to be undertaken with all fire safety/protection measures being brought up to the most up to date requirements of Building Regulations.

8.1.3 As part of the Building Safety Act 2022 (BSA), the "golden thread" is a process to obtain and keep the right information in order to understand the proposed development and the adequate measures in place to keep both the building and the people using it safe. The golden thread involves keeping a digital record of crucial building information from design phase and continuing on through the construction phase to maintain and update the record throughout the building's lifecycle.

8.1.4 The Golden Thread of information for each building will be individual, bespoke, and specific to the building and group of residents and occupants. Ultimately the duty to keep and manage the information thread lies with the dutyholder, as defined in the Building Safety Act.

8.1.5 The deliverables produced for the London Plan submission have been prepared digitally and will be submitted via email (with records of distribution available) to Fifth State. As part of Orion's contribution to the golden thread of information, all electronic correspondence and communications are securely stored to minimise data loss, which may affect the ability to collate the information as part of the golden thread of information.

8.1.6 To meet the requirements of the BSA, the dutyholder during design and construction is required to submit a complete pack of information to the Accountable Person/Principal Accountable person. This information includes the golden thread of information, as well as other pieces of information such as the building completion certificate and relevant fire safety information.

8.1.7 Under Regulation 38 of the Building Regulations, the Responsible Person for the development should be provided with all essential fire safety information either when the project is complete, or when the premises are first occupied. The information required to achieve this is provided within a collated Operation and Maintenance (O&M) Manual, which incorporates information produced by various consultants, and contractors. The fire safety strategy produced as part of the project design provides a performance specification for the development during the design phase and acts as a summary of the systems that should be in place within the development post-completion. The fire strategy alone is not sufficient to act as the package of fire safety information handed over the Responsible Person under Regulation 38.

8.1.8 The ongoing management and maintenance of the Blocks must be undertaken in accordance with the duties and obligations imposed on the Responsible Person under the Regulatory Reform (Fire Safety) Order 2005(RRO) as amended. To allow for future fire safety management as required by the RRO to be co-ordinated with the design of the building this statement is provided to identify:

- The minimal standard of Fire Safety Management upon which the fire safety strategy is based; and
- Specific Fire Safety Management requirements which are made as part of the fire safety strategy which must be adopted as part of the Fire Safety Management Plan to maintain the building in a condition consistent with the fire safety strategy.

8.1.9 This fire statement is developed on the basis that the Fire Safety Management of the Blocks will achieve at least the standard required to comply with the Regulatory Reform (Fire Safety) Order 2005 such that no further improvement measures would be required to the structure or layout of the building.

8.1.10 Orion will be involved for the duration of RIBA Stage 2 and will provide advice/direction on any actions that need to be undertaken. Any changes or modifications to the building at the later RIBA Stages should be monitored for full adherence to the guidance and Building Regulations by the appointed fire engineer at each RIBA Stage.

9 Policy D5B(5)

9.1.1 There are a number of accessible flats designed or adapted to enable independent living for people with disabilities as part of the proposed development. These are distributed across the upper floors of each residential Block. The location and number of accessible apartments has been noted below:

- Block C3 – 4 x M4(3) units
- PBSA Block – 24 accessible units

9.1.2 For the upper floor levels, each block is to be provided with evacuation lifts to be designed to EN 81-20, and Annex D of BS 9999, serving all floors of the respective block to allow for dignified escape for all occupants of the building. The evacuation lifts should be driver operated.