



INTERNATIONAL FIRE CONSULTANTS LTD

PRIVATE & CONFIDENTIAL

**11-12 Ingestre Road,
Camden**

Fire Safety Strategy

IFC Report FSS/18376/01

Prepared on behalf of: FQIR Ltd

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ISSUE RECORD

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EXECUTIVE SUMMARY

International Fire Consultants Ltd. (IFC) has been commissioned by FQIR Ltd to advise on the fire safety strategy for the proposed residential development at Ingestre Road, Camden.

This report details the Fire Safety Strategy and includes proposed fire safety provisions that will, in our opinion, achieve compliance with the Building Regulations 2010 (as amended).

The Fire Safety Strategy uses the relevant recommendations contained within BS9991:2015 for the building where code compliance is achieved by the architectural layout, and a performance based design where code compliance does not occur.

The development consists of a six-storey apartment building over a basement car park/ancillary accommodation. The intended premises is an Extra Care facility and it is understood some occupants will require assistance to escape.

The key fire safety features have been identified and summarised in the following ways:

- The buildings will be primarily code compliant against BS 9991:2015
- The flats and ancillary accommodation will have sprinkler protection (not circulation routes or car park)

It is expected that the information contained in this report will form the substantive basis for Regulation 38 elements of the Building Regulations 2010 submission to the Building Control Body for approval and, upon completion, used by the Responsible Person to inform the risk assessment of the common areas of the building, as required by the Regulatory Reform (Fire Safety) Order 2005.

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1. INTRODUCTION

International Fire Consultants Ltd (IFC) has been commissioned by FQIR Ltd to advise on the fire safety strategy for Ingestre Road, Camden

The development consists of the following elements:

- Six storey plus basement apartment building;
- The building is proposed for Extra Care and could have residents who need assistance evacuating
- The basement has a car park and ancillary accommodation such as a Gym with Studio, Cycle Store, Residential and Commercial Refuse Rooms, Staff Changing, Laundry and Plantrooms
- The Ground and First Floors have some ancillary accommodation such as a Residents Lounge, Commercial Kitchen, small Café/Newsagents, Reception area and some multi-use rooms
- The building spits into two attached single stair blocks from Second-Fifth Floor level.

This Fire Safety Strategy report details the fire safety design for means of escape, internal and external fire spread and fire service access to the buildings.

The Fire Safety Strategy has been based on the drawings received on 6th June 2018 by Barton Willmore as outlined in Table 1. As the design of the project is an iterative process these drawings may not include all recommendations within this report. Subsequent drawing updates should be updated to reflect the advice given in this fire strategy.

Drawing Number	Rev	Drawing Description
A-P11-00	A	Basement Plan
A-P11-01	A	Ground Floor Plan
A-P11-02		First Floor Plan
A-P11-03	A	Second Floor Plan
A-P11-04		Third Floor Plan
A-P11-05		Fourth Floor Plan
A-P11-06		Fifth Floor Plan
A-P11-13	A	Elevations
A-P11-10	-	Site Plan

Table 1 – Drawings reviewed

BS 9991:2015 has been used as a performance benchmark whereby the recommendations in that standard are used as a basis for the fire strategy, but where departures from the generic guidance occur due to the proposed layout a performance based design is utilised with specific intent to satisfy the relevant Regulation and its functional requirement.

BS 9991:2015 typically provides recommendations based on a defend-in-place approach, and the smoke ventilation provisions in particular are necessary in order to ensure such a philosophy works as the evacuation phase is of an unknown duration. The basic principle of assessing means of escape in buildings containing flats is horizontal within the flat, followed by horizontal within the common area and finally vertical to outside.

Ancillary areas will have a simultaneous evacuation.

Some of the objectives identified within these approved codes can be met by using alternative solutions developed using the principles of fire safety engineering, which is an accepted means by which compliance with Building Regulations can be shown.

It is important that both the residents and the building management have a clear understanding of the fire safety strategy adopted and of the operation and maintenance of the equipment designed to protect lives and property. The development of accurate and concise documentation will be required for both the occupiers and management.

It is envisaged that this report will be used to inform and assist the person or persons responsible for this building in the assessment of risk in the common areas with relation to fire as required under the Regulatory Reform (Fire Safety) Order. As such this report should be considered along with the recommendations and findings of the risk assessment.

It is recommended that the building insurers be approached so that their requirements can be considered as part of the scheme.

The report does not address contractors' site fire safety issues during construction.

2. LEGISLATION AND GUIDANCE DOCUMENTS

2.1 Building Regulations 2010 (as amended)

The building will be subject to the Building Regulations 2010. It will, therefore, have to comply with the Functional Requirements of Part B of Schedule 1 of those Regulations. These relate to:

- B1 – means of warning and escape;
- B2 – internal fire spread (linings);
- B3 – internal fire spread (structure);
- B4 – external fire spread; and
- B5 – access and facilities for the fire service.

The normal path for demonstrating compliance with these Requirements is by following the design guidance contained in Approved Document B (ADB)¹. Variations to the guidance given in those documents is permitted, as long as it can be demonstrated to have still met the Requirements shown above. Alternative approaches based on recognised design codes or fire engineering methods are however permissible.

This report has based the design of the building on BS 9991:2015². In situations where the building design varies from the guidance in that document, that has been highlighted and justified in this report.

2.2 Regulatory Reform (Fire Safety) Order 2005

Once completed, the building will be subject to the Regulatory Reform (Fire Safety) Order 2005 (referred to in the following as the Fire Safety Order, FSO). In blocks of flats it applies to the common and landlord-controlled areas only. It will require the Responsible Person for the building to ensure that a fire risk assessment is carried out by a competent person, and any fire precautions deemed necessary by that assessment are put in place. It should be noted that the word “person” in the judicial sense can refer to a corporation as well as to an individual.

This report (or subsequent updated versions of this report) could be used to assist that fire risk assessment.

The FSO itself contains no explicit standards defining what precautions are required in any given building or what level of safety should be achieved; however, there exist a number of recognised guidance documents which set out benchmarks. For blocks of flats, the key one is *Fire safety in purpose-built blocks of flats*³, published by the Local Government Group.

¹ *The Building Regulations 2010: Fire Safety. Approved Document B, Volume 2 – Buildings Other Than Dwellings*, 2006 edition with 2007, 2010 and 2013 amendments, Department for Communities and Local Government

² BS 9991:2015. *Fire safety in the design, management and use of residential buildings. Code of practice*

³ *Fire safety in purpose-built blocks of flats*, Local Government Group, London 2011

2.3 Construction Design and Management Regulations 2015

The CDM Regulations require that the design of the building should ensure that it can be constructed and managed safely.

This report deals with the fire safety design of the building when completed and does not address fire safety during construction.

There are a number of standard guidance documents available giving guidance on managing fire safety within construction sites (such as HSG 168 produced by the HSE) and so the relevant main contractor will need to ensure that the construction site complies with that guidance.

3. MEANS OF ESCAPE

3.1 Evacuation Strategy

A "defend in place" evacuation strategy is typically assigned to residential flats due to the high degree of compartmentation. A fire is assumed to be confined in the flat of fire origin and only occupants in the flat of fire origin evacuate in the first instant. Other building occupants may remain unaware of the fire unless evacuated by the Fire and Rescue Service (FRS) or they may choose to evacuate at any time.

3.2 Flats – Common Area

The maximum travel distance in the common corridor in a single direction is 15m provided this corridor is ventilated and each apartment sprinkler protected.

The Ground Floor has a corridor which has an 11m travel distance before alternative paths available and therefore satisfactory.

The First-Fourth Floor has corridor with 15m travel distance to stair door and code compliant.

The Fifth Floor has a travel distance of 14.5m and therefore satisfactory.

Where access to two alternative exits is available this can be increased to 60m to the nearest stair door. Travel distances in the proposed building are within this limit on the lower floors.

Travel distance in ancillary accommodation is maximum 9m in single direction for plant or refuse rooms, but 18m for residents lounge, café, reception, hobby room, kitchen, gym, swimming pool, cycle stores or laundry rooms. Where alternative exits exist this would be 45m to nearest alternative exit in the hobby room, residents lounge and gym.

The Hobby room when used as a single space could exceed 60 persons and therefore both double doorsets open in the direction of escape.

The car park can apply 25m in single direction and 45m to nearest alternative exit. This is satisfactory.

Both stairs discharge direct to outside, with the Basement stair being separated at Ground Floor from the stair serving the upper floors.

All doors will be minimum 800mm wide with stair final exits being as wide as the stair. The minimum stair width is 1000mm for residential stories and given the low occupancy can be used for the separate basement flight as well.

3.3 Internal planning within flats

The flats need to be planned so that it is reasonably likely that the occupants can escape in the event of a fire within the apartment. UK design guidance recognises that it is not, and never has been, common practice to provide more than a single entrance/exit from a flat constructed on a single level.

BS 9991:2015 suggests that flats having an entrance on the same level as the flat itself should conform to one of the following recommendations:

- A protected internal hallway leading off to all habitable rooms having a travel distance not exceeding 9m from the flat entrance door to the door of any habitable room should be provided; or.
- The total travel distance from any point of the apartment to the entrance door of the flat should be limited to 9m. Cooking facilities should be sited away from the flat entrance door and internal escape route.

All flats are provided with protected entrance halls which have satisfactory travel distance. Note travel distance can be extended upto 20m from any point in the flat to the flat exit with a sprinkler system.

Any air handling systems installed within the flats should be designed and installed so as not to compromise evacuation i.e. penetrate the protected hallway unless fitted with fire & smoke dampers or other suitable method of protecting the escape route, or to spread fire and smoke out of the flat of fire origin.

3.4 Disabled egress

It is normally expected disabled persons either stay in their flat or, if the flat of fire origin, await assistance in the protected stair in a defend-in-place building. However as occupants may need assistance to escape each stair will have a 1400mm x 900mm disabled refuge clear of the escape path.

Evacuation chairs will be provided in each stair to assist with evacuation. Management will need to provide a Personal Emergency Egress Plan (PEEP) including identifying the units with persons needing assistance to escape and training staff in evacuation procedures.

There will also need to be sufficient staff to carry out all duties during a fire event at any time of the day/night.

Occupants at Ground Floor in ancillary accommodation can escape unassisted as there is no stepped change in level.

Occupants in the Basement are provided with a disabled refuge in each stair.

4. FIRE SAFETY SYSTEMS

4.1 Automatic Fire Detection and Alarm System

There will be a standalone LD1 Grade D smoke alarm system conforming to BS5839-6:2013⁴ to each flat which would require:-

- at least one smoke detector to be sited in each hallway;
- heat detector in the kitchen;
- smoke alarms in the living room and each bedroom

There is no interconnection between smoke alarm systems in different flats. However the system will send an alert signal to a control panel that can be monitored by Management. Management can then investigate whether it is a false alarm or not either by a voice communication system or physical presence.

The smoke and heat alarms should comply with BS 5446 *Fire Detection and Fire Alarm Devices for Dwellings* Parts 1 and 2 respectively.

The smoke alarms specified above should be of the optical type.

As a sprinkler system is proposed to each flat this can be used as an automatic heat detector in the kitchen instead of a separate device as the sprinkler system would activate the smoke alarm system in that flat via the flow switch (but not vice-versa).

Note the sprinkler system could also be zoned by floor and only send an alarm signal to Management and this would require the LD1 system to have its own heat detector in the kitchen.

The common circulation routes will have a Category L5 system to BS 5839-1:2017⁵ to activate the smoke ventilation system. These will be optical smoke detectors on each stair landing and in the common corridor. They will be linked to a control panel in the main entrance.

There will be no sounders or manual call points in the residential storeys.

Ancillary accommodation will have a Category L3 system and use low noise sounders in order to warn staff and residents to evacuate simultaneously. Low noise sounders are either 5dB above ambient or between 44-55dB.

⁴ BS 5839-6:2013. *Fire detection and fire alarm systems for buildings. Code of practice for the design, installation, commissioning and maintenance of fire detection and fire alarm systems in domestic premises*

⁵ BS 5839-1:2017. *Fire detection and fire alarm systems for buildings. Code of practice for design, installation, commissioning and maintenance of systems in non-domestic premises*

4.2 Smoke ventilation

Each stair will be provided with a 1m² automatically opening vent (AOV) at its head.

The corridor in front of each stair on the Ground to Fifth Floors and the lobbies at Basement will be provided with a 1.5m² naturally vented smoke shaft (with 1m² AOV into it). As the smoke shaft must extend 2.5m above the ceiling of the highest floor served, the corridor on the Fifth Floor will be by a 1.5m² external wall window or rooflight AOV rather than by the smoke shaft to avoid a chimney type arrangement.

On activation of smoke detection in the common corridor/lobby the relevant corridor and stair AOVs will open simultaneously. Each stair AOV will also open independently from smoke detection in each stair.

AOVs are to comply with BS EN 12101-2:2017.

The fire service will be provided with a facility to open/close each vent which is proposed as a control panel given the number in the building. The control panel should identify if an AOV is open or closed and any fault. It can be integrated with the smoke detection control panel if required.

The car park will have a mechanical extract smoke clearance system giving minimum 10 air changes per hour. Primary and standby fans will be rated at minimum 300°C for 60 minutes with two power supplies. The system will operate off automatic fire detection in the car park.

4.3 Sprinkler System

A Category 1 sprinkler system will be provided to all the flats and ancillary accommodation (not the car park) to BS 9251:2014. The circulation routes will not be sprinkler protected to ensure efficiency of the smoke ventilation system.

BS 9251:2014 does not propose a secondary power supply for the sprinkler system.

4.4 Emergency lighting and escape signage

The common escape routes including stairs should be adequately lit and be provided with emergency escape lighting. The emergency escape lighting should comply with BS 5266: *Emergency lighting*: Parts 1-7.

It is recommended that storey exits and final exit doors are automatically illuminated to a higher level than the rest of the area on main power failure, in order to distinguish them should some smoke be present. Occupants can then move towards the bright light to an exit.

With regards the storey exits to the residential levels, IFC recommends that these be rear illuminated (as opposed to front illuminated) exit signs. This is due to rear illuminated signs being easier to see for the same smoke obscuration level.

Emergency lighting may be supplied by a central battery system, two low voltage supplies or a local battery/inverter.

Signage in the escape routes, stair and other public areas should be installed to BS 5499-4:2000 *Code of practice for escape route signing*. In residential storeys, the colours and style of the signage can be agreed with Building Control so that it may be more architecturally sensitive and sympathetic to the surroundings.

4.5 Life Safety Power Supply

All cables for life safety system should comply with Table A of BS 8519:2010⁶.

Two power supplies are required for the following:

- automatic detection and alarm system;
- emergency lighting;
- automatic smoke ventilation systems

It is intended to use battery power for the emergency lighting and fire alarm.

⁶ BS 8519:2010. *Selection and installation of fire-resistant power and control cable systems for life safety and fire-fighting applications. Code of practice*

5. INTERNAL FIRE SPREAD (LININGS)

The wall and ceiling linings of an enclosure such as a room can have a dramatic effect on the development of a fire and, in particular, the time it takes for the room to become completely involved. It is considered that the floor finishes do not significantly contribute to the development of a fire and are generally not controlled.

BS 9991:2015 suggests that wall and ceiling linings should have the classification as shown in Table 2, when evaluated by the methods described in BS476: Parts 6 and 7 as appropriate.

Location	National Class ^{B)}	European Class ^{C)}
Small room of area not exceeding 4m ²	Class 3	D-s3, d2
Other rooms	Class 1	C-s3, d2
Circulation spaces within dwellings	Class 1	C-s3, d2
Other circulation spaces including the common areas of flats	Class 0	B-s3, d2

NOTE Linings which can be effectively tested for "surface spread of flame" are rated for performance by reference to the method specified in BS 476-7:1987, under which materials or products are classified 1, 2, 3 or 4, with Class 1 being the highest.

^(A) The National classifications do not automatically equate with the equivalent classifications in the European column, therefore products cannot typically assume a European class, unless they have been tested accordingly.

^(B) When a classification includes "s3, d2", this means that there is no limit set for smoke production and/or flaming droplets/particles.

Table 2 – Classification of Linings

In this table, Class 0 is better than Class 1. It is not identified in any BS test standard. A Class 0 product is either:

- composed throughout of materials of limited combustibility; or
- a material having a Class 1 surface spread of flame and which has a fire propagation index (I) of not more than 12 and a sub-index (i1) of not more than 6.

The fire propagation index is established by reference to the method specified in BS 476-6:1989⁷. European classifications are described in BS EN 13501-1⁸.

Parts of walls may be of a lower class than above provided that the total area in any one room does not exceed half of the floor area, up to a maximum of 20m² in residential accommodation and 60m² in non-residential accommodation.

IFC recommend that Class 3 products are avoided where possible.

⁷ BS 476-6:1989+A1:2009. *Fire tests on building materials and structures. Method of test for fire propagation for products*

⁸ BS EN 13501-1:2007+A1:2009. *Fire classification of construction products and building elements Classification using test data from reaction to fire tests*

6. INTERNAL FIRE SPREAD (STRUCTURE)

It is important that the structure and key construction elements of a building remain fully functional for a reasonable period of time during a fire. It is obviously beneficial if these elements remain in a serviceable condition after the fire for ease of reinstatement. In addition a fire should be contained by fire resisting elements of the building to prevent it spreading to other parts of the building. This containment should include voids and cavities that could provide a path for fire.

The buildings highest occupied floor level is below 18m above ground level (16.2m) and has a Category 1 sprinkler system, therefore 60 minutes fire resistance will be provided.

All floors are compartment floors (60 minutes fire resistance).

All shafts (stair, lift) and risers passing through the floors are protected shafts and will need to be constructed to minimise fire spread, and should therefore provide 60 minutes fire resistance enclosure and FD30S doorsets. Service risers may have FD30 fire rated doorsets if not opening directly into an escape route and doors need not be self-closing as they will be kept locked shut. Lift landing doors will be FD30.

The stair external wall has a window but is minimum 1.8m from window to the adjacent flat therefore satisfactory.

Each dwelling will have minimum 60 minute compartment wall to other dwellings and/or other parts.

Each flat entrance door will be FD30S self-closing doorsets with no non-insulating glass or other non-fire resisting apertures.

Fire hazard rooms such as refuse room, plant room, laundry room and scooter charging room will have 60 minute compartment walls to other parts of the building with FD30S self-closing doorsets where doors are internal.

Cycle stores though low hazard will have the same 60 minute compartment wall and FD30S self-closing doorset criteria applied.

In the basement the lobby serving the cycle stores will be a protected corridor with minimum 30 minutes fire resistance (note some walls will be 60 minutes) and FD30S self-closing doorsets. The same applies to the corridors serving the laundry rooms and plant rooms.

Cross corridor door separating the two stairs will be FD30S self-closing, on the lower floor levels.

Compartment walls must be extended to roof level and suitably fire stopped. The junction of a compartment wall or floor with an external wall that has a cavity should have the fire resistance maintained through the cavity. This would be 60 minutes fire resistance.

All pipes, ductwork and services passing through fire-resisting barriers should be penetration sealed with an appropriate sealing system and/or fire damper which has been shown by test or assessment to maintain the period of the fire-resistance of the barrier.

Any ductwork crossing an escape route must be a fire+smoke damper operated automatically off smoke detection in the ductwork and a fusible link only if not crossing an escape route. The fire+smoke damper will have fusible link as back up.

All fire doors are self-closing unless otherwise stated.

All fire and smoke control assemblies should be provided with appropriate certificate from a recognised third party accreditation body in order to demonstrate compliance with Clause 0.15 of Volume 2 of Approved Document B and Regulation 38 of the Building Regulations 2010. Assessment and test evidence should also be available for inspection by the approving authorities and other interested parties.

Cavity barriers will be required in any cavities (such as suspended ceiling or floor void) only if over 20m in length. Cavity barriers require 30 minutes fire resistance (30 minutes integrity and 15 minutes insulation).

7. EXTERNAL FIRE SPREAD

7.1 Unprotected areas

When a building is on fire, heat will radiate through non fire-resisting openings in the external walls. This heat can be intense enough to set fire to adjoining buildings. In order to reduce the chance of this occurring, the Building Regulations place limits on the area of external elevation with no fire resistance. This area is known as the 'unprotected area' and is affected by such factors as distance from the boundary, use of the building and compartment size.

BRE Report BR187 *External fire spread: building separation and boundary distances* has been applied as a suitable method for calculating minimum boundary distances or maximum unprotected areas, as referenced in BS 9991:2015.

Boundary locations are taken as the centre of a public highway or the boundary of the site.

Residential buildings are typically well compartmented internally, with each flat being a 60 minute fire resisting compartment. Due to this, a fire is expected to remain within the flat of origin and thus will not represent a large radiation source when calculating external fire spread. As each flat is a separate compartment; only one flat will be on fire at a time.

The relevant boundary on each side of the building is over 1.75m from any flat with an enclosing rectangle of 12m x 3m high. Because of this, according to the BRE guide 100% unprotected area is permitted to non-load bearing elements in the external wall.

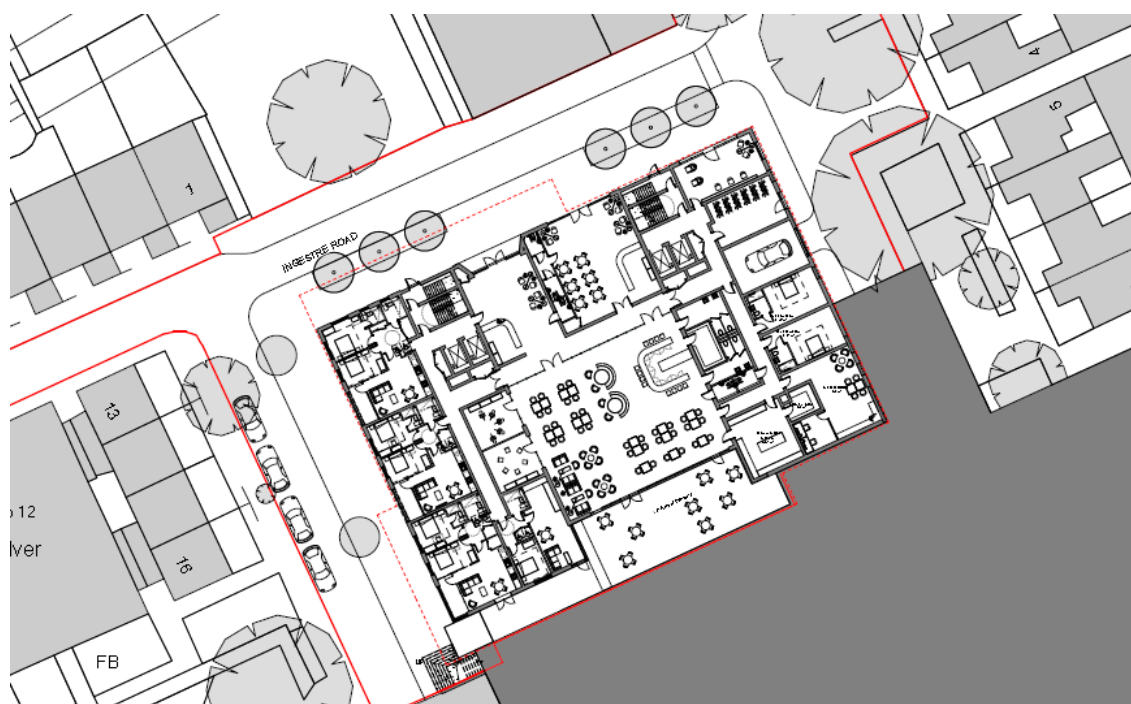


Figure 1: Site Plan

7.2 Cavities

Generally, all cavities within external walls should be fitted with cavity barriers at all compartment boundary locations (floors, party walls etc.). Cavity barriers should achieve a fire resistance of at least 30 minutes for integrity and 15 minutes for insulation. Alternatively, cavity barriers around openings in the external wall may be formed of:

- steel at least 0.5 mm thick;
- timber at least 38 mm thick;
- polythene-sleeved mineral wool, or mineral wool slab, in either case under compression when installed in the cavity; or
- calcium silicate, cement-based or gypsum based boards at least 12 mm thick.

Note: any cavity that is filled with insulation would still be considered a cavity, so cavity barriers would still be required through the insulation.

Cavity barriers are also required around all openings in the external walls, such as for windows, doors or service penetrations in accordance with Building Control Alliance BCA Note 26 "Service Penetrations through external wall constructions of residential buildings".

7.3 External wall surfaces

BS 9991:2015 suggests that external wall surfaces below 18m will be Index (I) less than 20 and Class O above 18m. Note, the 18m is measured to eaves or top of parapet in this instance not top occupied floor level and is circa 19.5m here.

7.4 External wall construction

As the building is less than 18m in storey height, there is no limit recommended on combustibility of insulation, fillers, etc used in the external wall in BS9991.

7.5 Roofs

The roof should have classification AA, AB or AC for surface spread of flame.

8. ACCESS AND FACILITIES FOR THE FIRE SERVICE

In order to extinguish a fire within this building it is important that the fire service can gain access onto the premises, and from there, into the building. This section deals with the various facilities intended to aid the fire service in fighting a fire in the building.

The access road should be suitable for a fire service pump appliance with a 3.7m clear width and 3.7m vertical clearance height. The load bearing capacity would be minimum 12.6 tonnes for a pump appliance. Ingestre Road as a private road and should satisfy this criteria.

The height of the building is less than 18m, and no firefighting shaft is required.

However all points on plan must be within 60m of the appliance parking location (as sprinklered flats) and currently this is not achieved. Therefore each stair serving the residential levels need a dry riser.

A dry riser will serve all points on plan within 60m of an outlet in each stair including the Ground Floor. The Ground Floor outlet is on the basis the fire service connect below the fire floor. The dry riser inlets to the external wall of the building will be located such that it is within 18m of the appliance parking location and visible from it.

Checks should be made that public street hydrants are available within 90m of the dry riser inlet points.

Portable extinguishers are to be provided in ancillary accommodation only (not flats, car park or residential circulation routes) to BS5306 Part 8, with type dependent upon classification of fire.

The car park will have a smoke clearance system at 10ach. Ancillary accommodation at basement level will have smoke cleared by opening doors between it and und the car park to use the car park system as rooms below 200m². The stair lobbies have natural smoke shafts at basement level.

Section 4.2 identifies fire service controls for the smoke ventilation system.

9. CONCLUSION

Based upon the information available to us at this time, International Fire Consultants Ltd. are of the opinion that were Ingestre Road, Camden designed, constructed and operated in accordance with this report, the building would fully comply with the requirement of Part B of the Building Regulations 2010 (as amended).

It is envisaged that this document will be used as part of the Building Regulations submission in support of Regulation 38 and Part B Fire Safety and by the responsible person in the risk assessment produced by the Landlord/Management Company and commercial tenants of the building under the Regulatory Reform (Fire Safety) Order 2005 (FSO).

There is a risk that the building control body and the fire and rescue service may take a different view from that detailed within this report, therefore they should be consulted as part of the Building Regulation submission at the earliest opportunity, and any comments addressed. This risk remains until a full plans approval has been obtained for the project, and any substantial recommendations from the fire authorities resolved.

10. LIMITATIONS

Our advice is strictly limited to the scope of our current brief, i.e. to provide a fire safety strategy for Ingestre Road, Camden.

International Fire Consultants Ltd has not reviewed any other issues within the project other than those identified in our report. We offer no comment on the adequacy or otherwise of any other aspects of the development (whether related to fire safety or any other issue) and any absence of comment on such issues should not be regarded as any form of approval. The advice should not be used for buildings other than that named in the title.

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