

Paul Le Mare
Assent Building Control
Staines One
Station Approach
Staines
Surrey
TW18 4LY

The London Fire Commissioner is the
fire and rescue authority for London

Date 9th September 2019
Our Ref FS/02/233216
Your Ref QP160427

Dear Mr Le Mare

RECORD OF CONSULTATION/ADVICE GIVEN

REGULATORY REFORM (FIRE SAFETY) ORDER 2005 ARTICLE 46 THE BUILDING (APPROVED INSPECTORS ETC.) REGULATIONS 2010

SCOPE OF WORKS: New build of 7 flats.

PREMISES: 155 Drummond Street, London NW1 2FB

PLAN NUMBERS: response to LFB letter dated 24/06/2019, Proposed plans for basement , ground ,
mezzanine, 1st floor, 2nd floor, 3rd floor, 4th floor, 5th floor, 6th floor, 7th floor and roof.

The London Fire Commissioner (the Commissioner) is the fire and rescue authority for London. The Commissioner is responsible for enforcing the Regulatory Reform (Fire Safety) Order 2005 (The Order) in London.

The Commissioner has been consulted with regard to the above-mentioned premises and makes the following observations:

The Commissioner is satisfied with the proposals. Please see comments below :

Fire Engineering Group is satisfied with the proposals, subject to the comments below

(1) Comments on proposed scheme primarily relating to the Regulatory Reform (Fire Safety) Order 2005

We note the itemised response to our initial response dated 10/04/2019 and therefore maintain the same numbering system below for ease of reference.

**Letter to BCB dated 24/06/2019 – Response to LFB Letter
FSEC UK Response dated 08/05/2019**

5.2

The comment concerning dry risers is noted, however, our original comment referred to service risers, noted dry risers. It should be confirmed whether the service risers e.g electrical are accessible via the common parts and do not run through the flats via the voids adjacent to the lift shaft which is currently proposed to serve the flats directly.

3.11

The commentary on the lift proposals are noted, however, we are sceptical that a suitable and sufficient 'Management Plan' can be practically implemented to satisfactorily justify the proposed design. For example, how are the managing agents expected to control and monitor the flat entrance lobbies (as described in the response) on a day to day basis? Such an expectation appears entirely unrealistic. Consequently we remain of the opinion that this is an unsuitable solution and recommend the BCB to seek an alternative layout which ensures that such an unrealistic level of management is not necessary. In this particular case it appears a simple solution is available whereby the flat entrance doors are relocated to allow connection between the lift and the common lobby/stair.

Should the design be approved by the BCB please ensure the responsible person is made aware of the onerous and unusual management protocols which will be required upon occupation and that, as the lift shaft is a common part, access to all flats will be required for inspection to take place under the Regulatory Reform (Fire Safety) Order 2005 (RR(FS)O). We note the reference to a 'management plan' to effectively manage areas within the flat demise and look forward to reviewing the plan through inspection under the RR(FS)O where it should be demonstrated that checks/removal of belongings are carried out on a regular basis by the management team.

(2) Comments on proposed scheme primarily relating to the Building Regulations

FSEC UK Response dated 08/05/2019

1.3

We note the fire engineers comments on the lack of a firefighting shaft, however, we disagree with the method of measurement which should be to the topmost occupied storey as per diagram D6 of ADB(2019). We note reference is made to AWFSS in accordance with BS8458:2015, however it is unclear whether this is proposed throughout the building to offer protection to all flats. We recommend that the BCB confirms this arrangement (see also comment 7.2).

3.12

Revised drawings have not been provided within this consultation package. We note the further reference to an AOV at the head of the common stair and assume that the natural ventilation will be provided in accordance with clause 2.26 of ADB.

6.0

Noted.

7.2

The fire engineer's justification is noted however it remains unclear whether the AWFSS will be provided throughout the building. The specification/type of the AWFSS is also unclear. Where water-mist is utilised, it should be ensured that the system is fully compliant with BS:8458:2015 (not just the testing performance). The fire strategy should include the specification of the system and define any enhanced provisions which may be necessary to meet the design objectives.

Although the proposals go some way in mitigating the delay in getting water to the site of a fire when considering the lack of a firefighting shaft, firefighting on the upper floors may also require additional resources to counteract the effect of fatigue on operations. We note the comparative approach in terms of total distance versus a compliant premises however this does not take into account the vertical nature of the travel including the potential requirement to work charged hose up additional stairs to reach a floor level above 20m.

As mentioned in our initial response, firefighters would not use the lift unless it is a firefighters lift.

(3) Additional observations and recommendations relating to proposed scheme

The responses to our comments under section 3 are noted.

(4) Expected outcome of consultation

Based on the nature of the items raised above in sections (1) to (3):

- ☒ **We refer our observations/ comments to the building control body for resolution as the approving authority, and do not expect to be consulted further unless the proposed scheme significantly changes in the future**

Notwithstanding the above, we presume that all comments raised in this consultation letter will be forwarded to the client/ project design team for consideration.

The above observations are in relation to the current proposal and may not be relevant to any future proposal.

Any queries regarding this letter should be addressed to Alex Kitama. If you are dissatisfied in any way with the response given, please ask to speak to the Team Leader quoting our reference.

Yours Sincerely,



Assistant Commissioner (Fire Safety Regulation)

Reply to Alex Kitama,

Direct T 0208 555 1200 x89170

The London Fire Brigade promotes the installation of sprinkler suppression systems, as there is clear evidence that they are effective in suppressing and extinguishing fires; they can help reduce the numbers of deaths and injuries from fire, and the risk to firefighters.