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

Date 18th February 2022
Our Ref 02/233097
Your Ref 2020/5473/P

Dear Nathaniel

RECORD OF CONSULTATION/ADVICE GIVEN

TOWN AND COUNTRY PLANNING ACT 1990

SCOPE OF WORKS: STUDENT ACCOMODATION BLOCK

PREMISES ADDRESS: 17-37 WILLIAM ROAD

DOCUMENTS REVIEWED:

- **JGA Fire strategy report issue 03 dated November 2020 reference EL7081/R1**

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 LFB has been consulted with regards to the above-mentioned premises and makes the following comments/observations:

LFB have concerns with the design that has been submitted, and in our opinion it does not satisfy the requirements of the London Safety Plan, Policy D12(A) (4) to:

"provide suitable and convenient means of escape, and associated evacuation strategy for all building users"

We do not believe that sufficient justification has been provided for the tall single stair approach, nor do we agree that particular aspects of the design are compatible for such an approach. Furthermore, in our opinion there are insufficient facilities provided to support the safe egress for disabled occupants.

The single stair approach

We note that a tall single stair (top floor height of 41m) has been proposed, however there does not appear to have been a substantive Qualitative Design Review (QDR) undertaken in accordance with BS 7974 to determine if this is an appropriate design approach, particularly considering the ancillary accommodation linking into the single staircase and the interconnectivity between above and below ground levels using the same stair. The QDR is the process used to identify significant fire risk hazards and most likely scenarios, so that the required level of quantified fire safety design can be established, and the design scenarios tested against foreseeable scenarios. This should also consider the nature of the

occupants (i.e. students) and how the building will realistically be used and managed on a day to day basis. One of the fundamental aspects of the QDR, particularly for a building of this height, should be to consider if reliance on a single stair is appropriate. The reference to the use of BS9991 and ADB Volume 2 are noted however we would expect a design that considers the particular design for this build holistically, hence the recommendation for a QDR.

Evacuation strategy

The proposed evacuation strategy is noted, however further detail should be provided as to how this building will be managed on a day to day basis and whether the accommodation, for example, is to be leased on a long terms basis or if there is any intention to utilise it for short term rental during holidays etc. The fire strategy makes reference to the potential for a simultaneous evacuation strategy however this is unlikely to be achievable with a single staircase for a building of this height.

Ensuring that the proposed evacuation strategy is one that is appropriate and manageable once occupied is critical, particularly when considered in conjunction with the ancillary spaces which are proposed to be on a simultaneous evacuation.

Evacuation lifts

The fire strategy suggests that there is no requirement to provide disabled refuges within the common areas of apartment floors. However, it is noted that an evacuation lift is being provided within this scheme and it is unclear why further consideration has not therefore been given to ensuring that any occupants waiting for the lift are provided a protected space to do so. The design should fully consider how occupants can safely wait for an evacuation lift to arrive and we question how this is achieved without the use of a protected refuge. Therefore, while evacuation lifts are proposed we question how they can be safely used. The safe egress of all potential occupants is required, and simply proposing an evacuation lift without protection measures to enable it to be safely used is not appropriate.
We note that an evacuation lift has been proposed, which in the opinion of the fire strategy complies with the London Plan. We disagree that it does based on the above point.

Final escape route

Further detail would need to be provided to support the proposal to not have a dedicated final means of escape route from the single escape stair. We would expect this to be a particular focus within the QDR process.

Ventilation strategy

We recommend that the ventilation strategy which currently incorporates automatically openable vents on the external wall is reviewed holistically as part of the QDR. While it is acknowledged that BS9991 does not exclude the use of windows for ventilating extended single direction corridors whether it is appropriate for this scheme, considering reference to potential simultaneous evacuation is questionable in our view.

Amenity spaces

The amenity spaces (for example the space on the 14th floor) in their current form are not compatible with the single stair design in our view. Amenity spaces such as this, which should be simultaneously evacuated in the event of a fire, require access to at least two independent escape routes.

Relying on a single escape route would require, in our view, substantial additional protection to the stair to demonstrate that it will remain free of smoke at all times, in all foreseeable scenarios, and will require confirmation that all occupants of the building will be evacuated prior to the expected attendance of the fire and rescue service. It is unlikely that this will be achievable in a tall residential tower such as this. An escape route, dependent on the building and its layout, can be at its most vulnerable during firefighting operations when doors may be required to be open for periods of time. This should be taken into account and considered carefully within a QDR process.

Any queries regarding this letter should be addressed to FSR-AdminSupport@london-fire.gov.uk. If you are dissatisfied in any way with the response given, please ask to speak to the Team Leader quoting our reference.

Yours faithfully,

[redacted]

Assistant Commissioner (Fire Safety Regulation)

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.