

Nathanial Young
Senior Planning Officer
London borough of Camden
5 Pancras Square
London
N1C 4AG

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

Date 31 October 2022
Our Ref 02/233097
Your Ref 2020/5473/P

Dear Sir/Madam

RECORD OF CONSULTATION/ADVICE GIVEN

TOWN AND COUNTRY PLANNING ACT 1990

SCOPE OF WORKS: Demolition (of no. 35-37) and redevelopment to provide a 15 storey (plus basement) building for use as student accommodation with affordable workspace (no 17-33 ground floor) and associated works.

PREMISES ADDRESS: 17-37 William Road, London, NW1 3ER

DOCUMENTS REVIEWED:

1. Plans package dated 26/10/2020 Revision S2
(attached to email from Camden Planning, dated 07/10/2022)
2. Jensen Hughes fire strategy report, Issue 06, dated October 2022, reference EL7081/R1

The London Fire Commissioner (the Commissioner) is the fire and rescue authority for London. The Commissioner is therefore responsible for enforcing the Regulatory Reform (Fire Safety) Order 2005 (The Order) in London. The Commissioner also has a duty to provide information, publicity and encouragement in respect of the steps to be taken to prevent fires and death or injury by fire, including advice how to prevent fires and restrict their spread in buildings and the means of escape from buildings and other property in case of fire.

London Fire Brigade (LFB) has been consulted about the above-mentioned premises and makes the following comments/ observations in respect of the ongoing planning consultation.

LFB recognises that a design improvement in regard to the inclusion of a second staircase is now proposed, which is welcomed.

- 1.1. This building is specified as providing accommodation for students and several of the apartments have been detailed as providing accommodation for wheelchair users. The fire strategy, fire statement and the appeal report do not, in our view, demonstrate that due consideration has been given to the likely behaviour of students and whether aspects of such behaviour could impact the viability of the stay put strategy adopted for this development in

conjunction with such a tall single staircase with an amenity space on the top level. Such behaviours should consider the way in which students socialise and communicate with each other and how this differs from a general-purpose block of flats.

2. London Plan Policy D5 'inclusive design' requires the development to incorporate safe emergency evacuation for all building users, by as independent means as possible. Where evacuation lifts are provided then the lifts and associated provisions should be appropriately designed and constructed.

- 2.1. We interpret 'associated provisions' to be those that are needed in conjunction with the lift to ensure the safe evacuation of the person needing to use the lift. In our view, an associated provision would be a safe place for someone to wait for the lift, i.e. a protected refuge space. While the fire strategy now includes for this provision it does not detail any principles in regards to acceptance criteria for any associated smoke control provision. It would be our expectation that the fire strategy is clear that the refuge space should remain clear of smoke and protected for an appropriate period.

- 2.2. For the safe evacuation of all occupants (including anyone needing assistance) it is critical that a management plan for this building is in place that supports this.

- 2.2.1. In terms of this scheme, while there is reference to 'on site management' this is not detailed as to whether this means that there will be a physical management presence within this building during the entire time that it is occupied. The latest information provided does not appear to clarify this detail.

- 2.2.2. There is reference to a Personal Emergency Evacuation Plans (PEEPs) being implemented for this site. However, little consideration appears to have been given to how this will be effectively supported as, for example, the detection and alarm systems within the flats, as proposed, do not show any connectivity back to a central panel for an early indication of any incident. This also has direct relationship to section 3.1 of the fire strategy where flexibility is requested for the evacuation strategy.

- 2.2.3. The fire strategy states that any management plans to support escape of mobility impaired occupants will be further developed during the post-planning design stages which implies that at this stage there are only high level, outline proposals in place. It is noted that the top level is now provided with three disabled refuges, however only one evacuation lift has been provided which appears to have been based upon consideration of what can be fitted into the design rather than having given full consideration for the number and distribution of potential occupants who may need assistance to escape. It is also noted that one of the disabled refuge locations is not associated with the evacuation lift and thus would require a carry down procedure, with associated equipment and staff training, if used.

- 2.2.4. In addition to considering the potential numbers of persons of restricted mobility who may need to use the evacuation lift and whether a single evacuation lift is suitable, a further consideration in this regard would be resilience and redundancy of both the evacuation and firefighters lifts. This should take into account periods of maintenance and potential fault conditions where either lift may foreseeably become unavailable for a period of time. These lifts are critical facilities supporting accessible means of escape and access for firefighters and it is our opinion that the applicant should demonstrate that there will always be an evacuation and firefighters lift available. Firefighters will expect to take control of the firefighters lift upon their arrival, which should be anticipated to be at an early stage of the incident following the arrival of the first fire appliance, and it is our expectation and that of fire safety design guidance that there should be no reliance upon firefighters to evacuate persons of restricted mobility awaiting assistance.

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,

A handwritten signature in black ink, appearing to be 'N. Singh', written over a light grey rectangular background.

Assistant Commissioner (Fire Safety Regulation)