

Twickenham Studios – Fire Statement for Planning

Project	Twickenham Studios
Subject	Fire Strategy
Topic	Planning application fire statement
Date	14th May 2021
Author	Andrew Nicholson – Director
Revision	0
Reviewed	Frances Radford – Senior Fire Engineer



1 Introduction

The new London Plan Policy D12 requires development proposals to achieve the highest standards of fire safety, embedding these at the earliest possible stage. Policy D5 also requires specific attention to the requirements for evacuation lifts, which form part of the fire safety features of a project.

Therefore, all major development proposals should be submitted with a Fire Statement.

A Fire Statement is a standalone document which defines the fire safety objectives and performance requirements of a development, and the methods by which these objectives will be provided/ satisfied. This is based on the Fire Safety Guidance (pre-consultation version) provided by the GLA for the New London Plan with regards to fire safety.

The Fire Statement should evidence the provisions made for the safety of occupants and protection of property as well as the provision of suitable access and equipment for firefighting and the justification for these measures.

The Fire Surgery Ltd are the appointed Fire Consultant for the refurbishment of Twickenham Studios and have been appointed to develop the overall fire strategy for the scheme. This Fire Statement is to support the application for planning permission. The information is primarily related to Block A which is the erection of a new four-storey block, comprising of a ground-floor café (Use class E(b)), with the upper floor in office use (Class E(g)(i) at the front corner of St Margarets Road and The Barons.

Consideration has been given to the partial demolition of Block C and the construction of a single storey extension, the construction of an additional storey and external stair access to Block E, the construction of an additional storey above Block H and the refurbishment and modernisation of all existing blocks within the site along with new signage.

The refurbishment proposals for the existing buildings are light touch and therefore do not significantly change the current fire safety arrangements in the building. However, a review of these arrangements has been undertaken and comments are provided in this report.

A fire strategy report is available for the current buildings on the site developed by First Option safety consultants which has been reviewed in the context of the planning application and the proposed changes.

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The Fire Surgery Ltd confirm that the fire safety of the proposed development and the fire safety information satisfies the requirements of London Plan Policy D12A.

2 Competency Statement








Paragraph 3.12.9 of Policy D12 explains that Fire Statements should be produced by someone who is: “third-party independent and suitably-qualified”. The Fire Surgery Ltd competency along with the fire engineers working on the scheme is provided below.

The Fire Surgery Ltd is an award-winning independent Fire Engineering design consultancy based in London. The company is a proud member of the Fire Engineering Council for the Fire Industry Association by virtue of the Chartered Engineering status of its engineers and also its ISO 9001 accreditation for Quality Management through BSI.




The specialist fire and risk consultancy team come from a varied background including mathematicians, a Chartered physicist, 5 Chartered Engineers and a management consultant who specialises in business continuity. Members of the Fire Surgery team contribute regularly to the development and writing of fire safety standards and industry best practice guidance, including *BS7974: Application of fire safety engineering principles to the design of buildings – Code of practice (2019)*, in which competency plays a fundamental part.

The Fire Surgery Ltd specialises in the development of fire strategies for all building types in central London. The Fire Surgery has a proven track record for securing Building Regulations approvals on a number of high profile new offices and refurbished offices in London having a strong working relationship with Local Authority Building Control and London Fire Brigade Fire Engineering Team at Head Quarters in Union Street.

Recently completed building fire strategies as a place of work include:

-  4 Kingdom Street with Allies and Morrison for British Land.
-  R7 Kings Cross with Duggan Morris for Argent.
-  S1 Kings Cross with Mossessian for Argent.
-  S9 International Quarter London with RSHP for Lend Lease.
-  100 Cheapside with EPR for Quadrant.
-  50 Victoria Embankment with Fletcher Priest for Quadrant.
-  16 Old Bailey with ORMS.

Recently completed fire strategies for public assembly buildings include:

-  Walkers Court, Soho with Matt Architecture,
-  The Old Vic restoration with Bennetts Associates
-  Alexandra Palace with FCBS

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2.1 The Fire Engineers

Andrew Nicholson BEng (Hons), MSc (Cantab), CEng, MIFireE is the founder and Director of The Fire Surgery. He is a Chartered Fire Engineer with 24 years' experience with Fire Engineering design. He has a specialist fire engineering degree from the University of Leeds and a Master's degree in interdisciplinary design from the University of Cambridge.

Andrew is a contributing author to the Fire Protection Association publication – Fire Risk Management in Heritage Buildings. He is also a standing committee member of the Association of British Theatre Technicians and works regularly on theatre buildings in London. He was invited onto the Special Interest Group by the Institution of Fire Engineers on Heritage Fire safety. He was a principal author of BS 9999 2008 and also sits on numerous British Standard committees including BS7974. He is a steering committee member of CIBSE Guide E Fire Engineering and was joint author of section 13 Fire Fighting Access. He is a standing committee member of the Technical Standards for places of entertainment.

3 Building Description

The Twickenham Film Studios site comprises a number of buildings, which together comprise approximately 9,000sqm of floorspace with the most prominent buildings fronting The Barons. The site contains three recording stages together with a number of other buildings which are used for purposes including postproduction suites, dressing and make-up rooms, wardrobe departments, camera rooms, prop rooms, art departments and offices.

The current Studios site extends to approximately 0.95ha (9,500sqm) and as illustrated by the Site Location Plan, the site is almost entirely covered in building footprint. Other than at its front (southern) corner, there is no space onto which the Studios can expand.

The buildings on the Studios' site display a mixed character, reflecting their time of construction. The buildings are of varying of architectural merit with some being of a stark, utilitarian appearance. Overall there is and lack of a cohesive and unifying architectural language across the site.

The Studios front The Barons to the east and St Margarets Road to the south. To the west is the railway line running between St Margarets and Richmond stations and to the north is the Arlington Works, 23 - 27 Arlington Road. The Studios has a long held interest in the acquisition of this site in order to further expand and enhance its operations.

To the north and east of the site, the area is predominantly residential in character. To the south, beyond Twickenham Studios, are Crown Road and St Margarets Road, which host a number of cafes, restaurants, shops and other commercial outlets.

3.1 Proposed Development

The development proposals include the partial demolition of Block C, the refurbishment of all buildings and the extension of Blocks E and H. The proposal also includes the construction of a new building (Block A) at the corner of St Margarets and The Barons, Twickenham, TW1 2AW.

Overall, approximately 1,740 sqm of new build is proposed across the site, with the majority comprising new space to be used in association with the operation of the studios (Use Class E(g)(iii) industrial processes (formerly Use Class B1(c)) with the upper floors of new Block A (approximately 664sqm) proposed to be used as offices (Use Class E(g)(i) (formerly Use Class B1(a))).

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3.1.1 Block A

Block A comprises the erection of a new, landmark four-storey building located within the Site's south eastern corner to provide a new ground floor café fronting St Margarets Road and The Barons, and 664 sqm of modern co-working office space across the upper floors. At fourth floor the curved elevation will be set back from the façade behind a roof terrace. The main entrance will front onto St Margarets Road. In order to accommodate this new building, a section of the boundary wall enclosing the site will be removed, as well as the street trees, cycle parking and street furniture on the highway.

Block A's front façade will be made out of terracotta-coloured concrete, formed in polystyrene casts in order to achieve the fine level of detail required to complement the adjoining terrace. The historic 'Twickenham Film Studios' sign will be reinstated onto the front façade.

The new building has been reviewed for fire safety and is provided in this report.

3.1.2 Block B

Block B will see the refurbishment of the foyer, cinema, and Foley Studios at ground floor, at the second floor, new office space will be created within the building following the rationalisation and reorganisation of other spaces. At roof level the Lounge will be refurbished and the kitchen will be extended. The façade of Block B will retain the period blue panels and be redecorated.

The works to block B do not significantly change the current fire strategy and therefore have not been considered in the context of this report.

3.1.3 Block C

The façade of main TV Studio in Block C will be enhanced through the removal of the decaying ventilation ducts. A new sign that reads 'Studio 3' will be painted onto the front elevation in white letters. These works of redecoration and repair do not require planning permission. The studio will contain a new build prop store in the south-eastern corner, providing 198 sqm of additional floor space, and will see one of its stages converted from a production studio to a TV studio. The roof of Block C will be covered in PV panels. The new prop store will also contain a refuse storage area.

The works to block C do not significantly change the current fire strategy and therefore have not been considered in the context of this report. The store room is a single story extension and there are limited fire strategy requirements for the this extension. The travel distances are acceptable for means of escape and the extension is on the building perimeter which allows easy fire fighting access.

3.1.4 Block D

Block D is ancillary to Block B and will be refurbished and redecorated. The works to this block do not require planning permission.

3.1.5 Block E

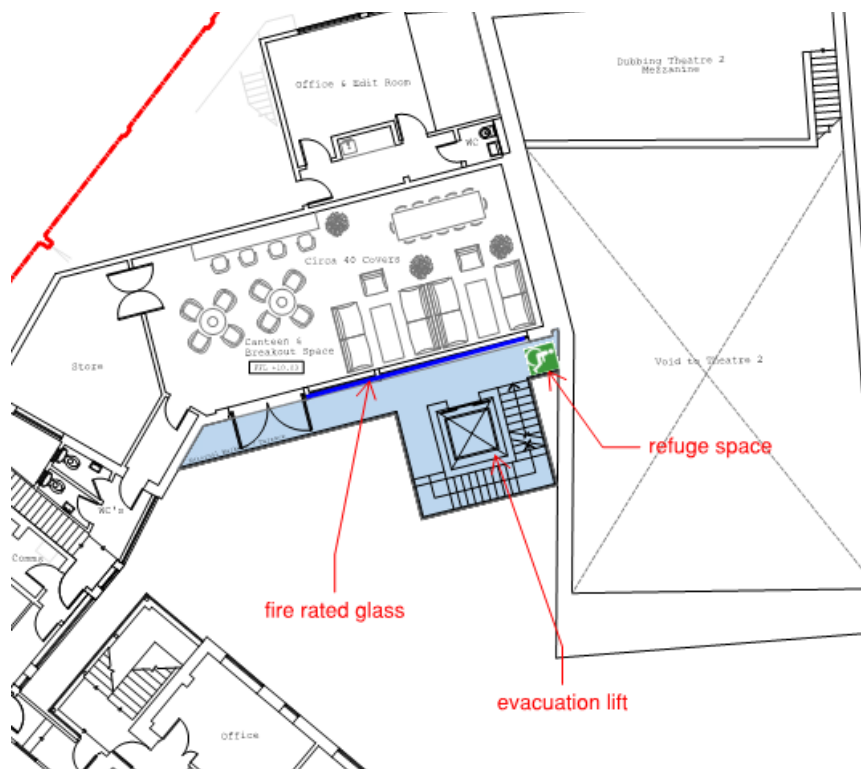
Block E will have a light weight roof extension added above the main building at second floor level with the new space to contain post-production suites and a theatre, providing 439 sqm of additional floor space. The extension will be of a pre-fabricated construction in order to ensure a swift on-site construction process, which will minimise disruption to filming and use of the production suites.

A new stair and lift core will be constructed to the east side of the building, leading up from ground floor to the first and second floors. At first floor level there will be an external walkway with doors

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opening into the canteen and breakout space. The outside area will also provide an enhanced external landscaped courtyard with an Airstream Café.

The new stair will be fire protected and can be used for means of escape. The new lift will be designed as an evacuation lift to BS 9999 2017 to comply with policy D5.



3.1.6 Block F

Block F will be have its exterior shell repainted and a sign of 'Twickenham Film Studios 1' in white block lettering on the façade facing The Barons. Again, the works to Block F do not require planning permission.

The works to block F do not significantly change the current fire strategy and therefore have not been considered in the context of this report.

3.1.7 Block G

Block G will have an exterior refurbishment, with an addition of a sedum roof. These works are not considered to require planning permission.

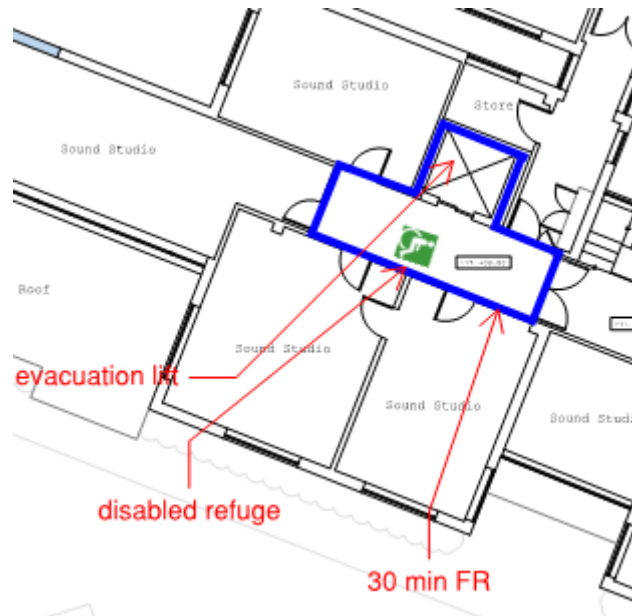
The works to block G do not significantly change the current fire strategy and therefore have not been considered in the context of this report.

3.1.8 Block H

Block H will have a light weight, pre-fabricated roof extension added to the south side of the building. The new space will provide expanded (204sqm of additional floorspace) and enhanced accommodation within the Studios' Oscar-winning Sound Centre. As with the proposed extension at Block E, the pre-fabricated construction ensures minimal disruption to the operation of the sound theatres within this building.

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The new stair will be fire protected and can be used for means of escape. The new lift will be designed as an evacuation lift to BS 9999 2017 to comply with policy D5.



4 Fire strategy objectives

The objectives of the fire strategy are to initially satisfy the requirements of the New London Plan Policy D12 for the planning application. Ultimately, the design will meet the functional requirements of Part B of the Building Regulations 2010. This is concerned with life safety of the occupants and facilitating adequate fire service access.

The fire strategy considers single accidental fires of those associated and most likely to occur in the buildings in question.

The main principles of the fire strategy are to demonstrate that building occupants can escape into a place of relative safety and evacuate the building to an ultimate place of safety outside of the building. It also demonstrates that there are reasonable facilities provided to ensure that the fire service can access and commence firefighting operations in the event of a fire incident. This includes facilities for those who may have mobility impairments such as wheelchair users.

The design will also incorporate the client insurers' requirements for property protection and/ or business continuity.

5 Guidance documents

BS 9999:2017 has been applied as the principal fire safety design guidance benchmark for this project.

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6 Block A

6.1 The building's construction, materials and fire protection

According to BS 9999, a non-sprinklered building less than 18m (measured to the topmost floor), with a risk profile of A2, the load bearing elements of structure require a minimum of 60 minutes fire resistance. The elements of structure in the proposed building will have 60 minutes fire resistance.

The following list of material are proposed for the building:

- 🌱 Moulded decorative concrete façade - pigmented to match adjacent historic elevation
- 🌱 Microcement covering to existing boundary wall.
- 🌱 Colour to match front elevation of Block A (existing render to be removed).
- 🌱 Prefabricated lightweight panels with aluminum cladding system. Cassette panel.
- 🌱 Illuminated signage.
- 🌱 Glass balustrade.
- 🌱 Glazed balustrade behind concrete elevation.
- 🌱 Perforated steel staircase and balustrade to external core.
- 🌱 Aluminium window system.
- 🌱 Aluminium crittal style windows to elevation
- 🌱 Metal Door/Gate system.
- 🌱 Metal surround to picture frame windows.
- 🌱 New green roof covering with pebble border.
- 🌱 Aluminium clad canopies/fascia/flashings etc.
- 🌱 Aluminium clad lift shaft overrun.
- 🌱 Timber HPL composite decking to balcony and terrace areas.
- 🌱 Solar PVs to existing roof.

A green roof is proposed as part of the proposed works. According to the Department for Communities and Local Government, Fire Performance of Green Roofs and Walls guide, green roofs can be adopted if recommendations of BS 9999 for roof coverings are met. The roof coverings for Block A are to meet National class AA, AB, or AC, or European class B_{roof(t4)} in line with BS 9999 therefore the proposed green roof is acceptable.

Timber HPL composite decking to balcony and terrace areas will be used and it is not possible to comply with BroofT4 for this type of material as they are not yet tested to this performance. However, the decking will achieve a Euroclass B-s3-d2,

In most respects, fires involving photovoltaics are little different from any fire involving live electrics, however, PV systems do present some new risks to fire-fighters as the power supply to electrical equipment may still continue during daylight hours.

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Inverters (and DC isolation switches) are often installed on the top floor of the building, or on/under the roof. This is not likely to be readily accessible to fire-fighters tackling a fire in the building. The DC switch should be operated remotely, for example from the main electrical unit at ground floor level or the fire brigade entrance. These are sometimes known as ‘fire-fighter’s switches’ for DC PV isolation.

PV panels will take up a large section of the roof and will be accessible for the fire service via the main staircase.

The fire fighter switch for DC PV isolation will be located at the ground floor entrance to the building.

7 Means of escape for all building users and evacuation strategy

The means of escape has followed the principles in BS 9999 2017. Where provisions exceed the minimum recommended standards in BS 9999, this has been highted in underlined text.

7.1 Evacuation Strategy

Block A is to be designed on a simultaneous evacuation strategy. This is to be based on a single stage (“single knock”) regime; upon activation of a manual call point or automatic fire detector, the alarm system will sound a signal for all occupants to evacuate the building.

7.2 Fire detection and alarm

Block A is to be provided with an automatic fire detection and alarm system to a minimum Category L2 level of coverage to BS5839-1.

This is an improvement on the minimum standards which only require manual call points in offices.

7.3 Occupant numbers

The occupancy of the building has been based upon relevant BS 9999 guidance. Since there is a single escape stair, the maximum occupancy for the each floor will be no more than 60.

7.4 Escape stairs

The building is provided with a single protected escape stair. BS 9999 permits the use of a single stair if the travel distances on the upper floors are acceptable an the top most accessible floor is no more than 11m when measured from the lowest external floor area.

The fourth floor is measured at 11.2m from the lowest external ground floor level. The increase of 200mm is acceptable in this case for as single protected stair by introduction of the L2 automatic fire alarm and detection system in the building which will provide early waring of fire.

The stair is provided with lobby protection at all levels.

The stair opens to the reception at ground floor. To protect the stair, a fire and soke curtain will be provided in this location in accordance with BS 8524 parts 1 and 2.

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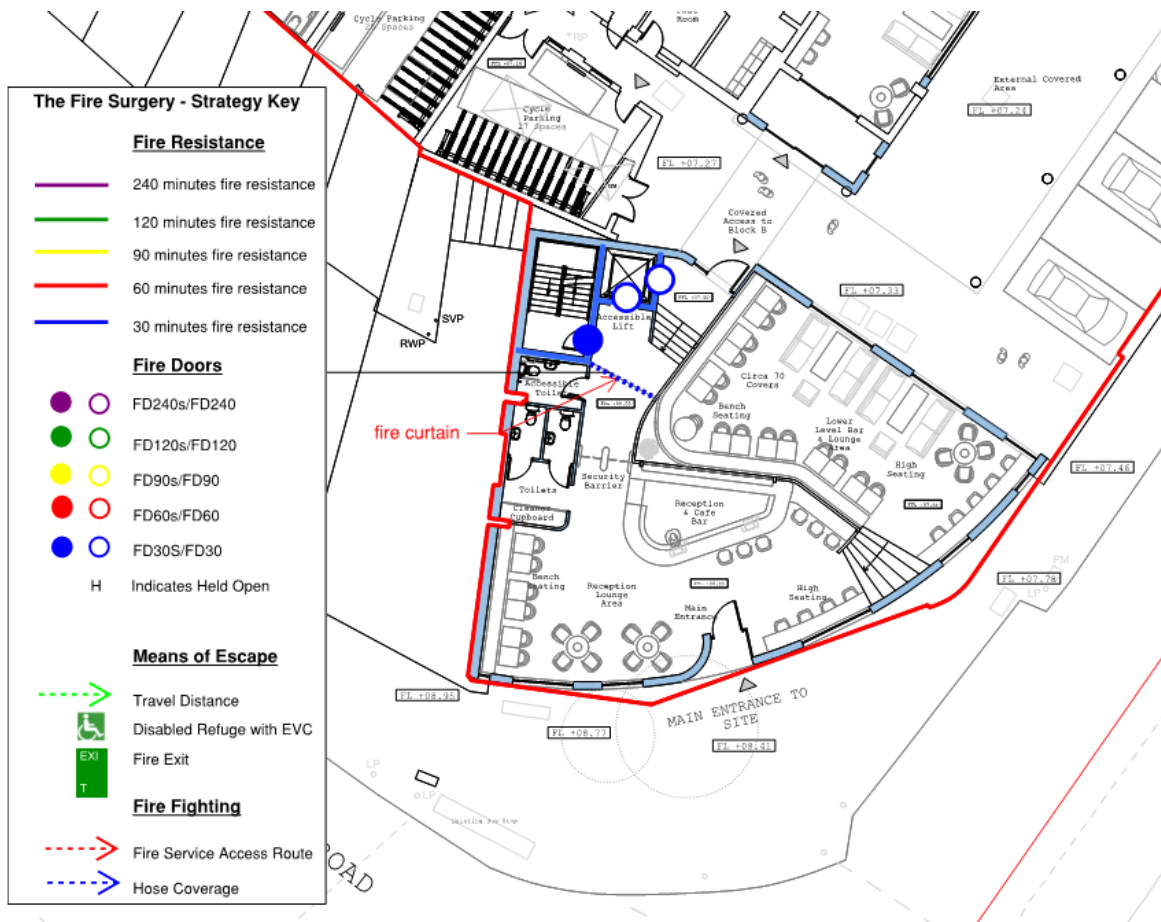


Figure 1, ground floor showing location of fire curtain

7.5 Travel distances

The available travel distances are measured to be within the recommendations of BS 9999 2017. For offices, this is 63.25m in two directions and 25.3m in a single direction. For restaurant/café, this is 57.5m in two directions and 23m in a single direction.

The travel distances for the ground and typical for upper floors are shown below.

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Figure 1: Travel distances on the ground floor



Figure 2: Indicative travel distances on the upper floors

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7.6 Exit widths

Storey exits from each of the office accommodations are to provide minimum clear widths of 850mm as recommended by BS 9999 for unassisted wheelchair egress. Corridors are to provide minimum clear widths of 1200mm to allow the egress of wheelchair users in line with guidance recommendations.

For the ground floor café, the final exit door will also be the minimum required from BS 9999 for escape which is 850mm. It is likely to be wider for general access.

Because there is likely to be more than 60 people in the ground floor, the final exit door will open in the direction of escape.

8 The use of evacuation lifts for disabled egress

Policy D5 of the London Plan requires the highest standards of accessible and inclusive design to be met.

Policy D5(B5) requires development proposals to be designed to incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.

Refuge points are to be provided in lobby of the escape stair. They are to measure at least 900mm by 1400mm to allow wheelchair users to manoeuvre into position. Each refuge point is to be provided with an emergency voice communication (EVC) system in accordance with BS 5839-9, linked to the reception area/ security room to allow mobility impaired occupants to call for assistance.

The preferred means of evacuation for people with mobility impairment from upper floors, according to BS 9999: 2017 and the London planning document D12, is by a lift with enhanced fire safety features that allow it to be used safely in the event of a fire.

Within Block A, there is a single new lift installation that can be used to evacuate people with mobility impairments. The lift will be upgraded to be provided as an evacuation lift in accordance with BS 9999. The lift installation to be used for disabled egress are to be provided in accordance with BS EN 81-76.

These provisions meet the requirements of the London Plan Policy D5 (B5).

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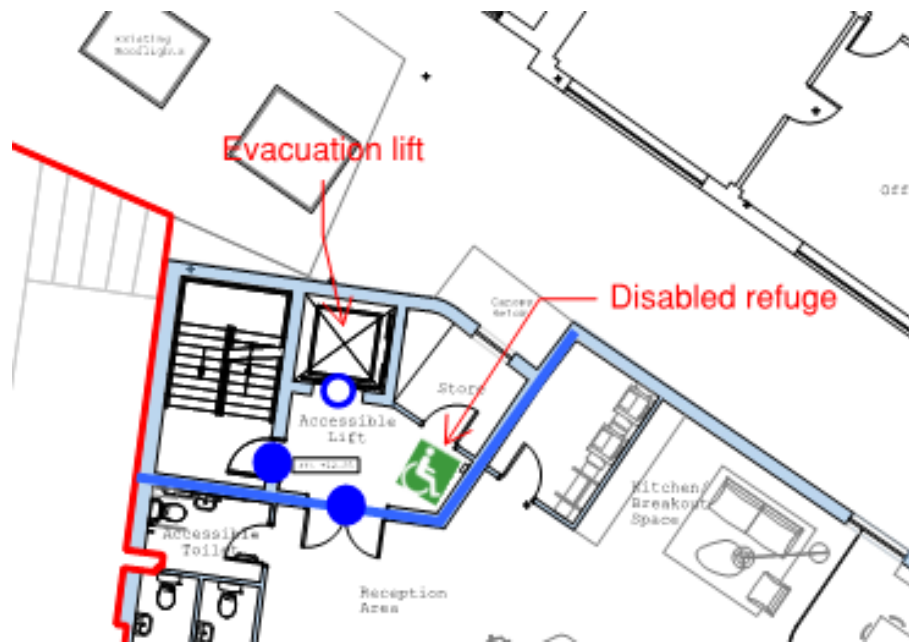


Figure 3: Disabled egress provisions within Block A

9 Passive and active fire safety measures

BS 9999: 2017 has been used in the choice of active and passive fire safety systems in the building. A list of those measures is provided below:

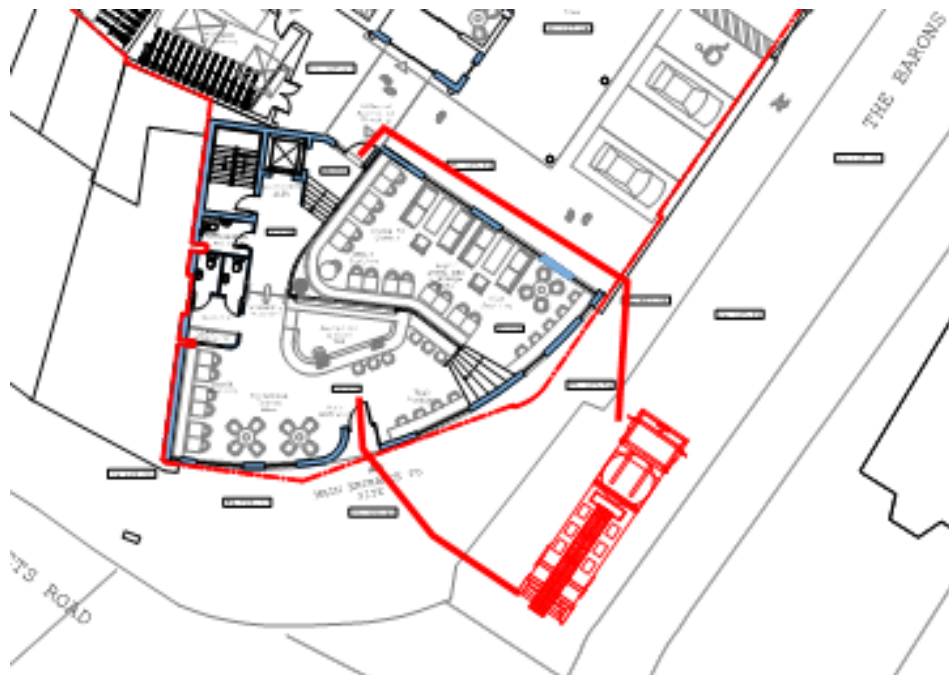
- 🌿 A Category L2 automatic fire detection and alarm system coverage to BS5839-1. Sounders are also to be provided on the external terrace areas, linked to the main fire alarm system.
- 🌿 Emergency Voice Communication systems on refuge points to BS 5839-9.
- 🌿 Emergency lighting in accordance with BS 5266.
- 🌿 Loadbearing elements of structure protected to a minimum 60 minutes fire resistance.
- 🌿 Internal fire compartmentation is specified in accordance with BS 9999.
- 🌿 New Evacuation lift to BS 9999 2017.
- 🌿 Dry fire main to BS 9990 2015.

10 Access and facilities for the fire and rescue service

For smaller buildings, it is possible for the fire service to fight the building externally or through the protected staircase.

Access is available to the building entrance for fire appliances from the main road network.

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BS 9999 recommends that for buildings greater than 11m in height a dry fire main should be provided.

Therefore, a dry fire main will be provided in the main escape stair with an inlet on the Barons visible and accessible for the fire service. The dry riser will be designed and installed in accordance with BS 9990 2015.

The hose distances on each floor are within the 45m recommendation.

Premises information for firefighters will be provided at the entrance to the main stair. This will contain all the key information on fire safety for the building for use by the fire service. It will be updated by the management of the building and this is written into the fire strategy to allow ongoing fire safety management responsibilities.

11 Future development of the asset and the ‘Golden Thread’ of information

The Independent Review of Building Regulations and Fire Safety was commissioned by government following the Grenfell Tower fire to make recommendations on the future regulatory system. The report, chaired by Dame Judith Hackitt, is entitled *Building a Safer Future (2019)* and provides recommendations in section 2 on the competency of those operating within the fire safety framework and requires overall consistency in fire safety from initial design through to occupation and future management. This is commonly referred to as the “Golden Thread”

Whilst this report is primarily written in the context of high rise residential and complex buildings, there are common recommendations which are applicable throughout the fire safety and construction industries.

The following information outlines how The Fire Surgery Ltd will consider the Golden Thread in the context of fire safety for Block A and the wider site.

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11.1 RIBA design stages

The Fire Surgery Ltd are appointed at RIBA Stage 2 to provide fire safety input into the early feasibility study of options for the refurbishment on the project. In RIBA Stage 3, a more detailed fire strategy will be produced to outline the main concerns and coordinate with the design team.

The Fire Surgery will have a continued appointment through RIBA Stage 4 Technical Design to maintain the agreed principles of the fire strategy.

Should the project be successful through planning, then services of The Fire Surgery are likely to be retained for RIBA Stages 3 and 4.

11.2 Construction Monitoring & Practical Completion

For fire safety design in buildings, it is important to monitor the procurement and construction of the fire strategy to ensure that the approved fire strategy is designed and actually constructed as intended.

The detailed design of active fire systems will be important, including the commissioning and testing of the systems.

Locations of passive fire protection can sometime change. Therefore, having the project fire engineer appointed during the tender, contractor lead designs and construction can ensure a smoother route to practical completion. The contractor has an obligation under Regulation 38 (formerly 16B) of the Building Regulations 2010 to hand over all fire related information for the project to the client, in order to allow them to manage the building successfully under the Regulatory Reform (Fire Safety) Order 2005.

This will require a Final Issue fire strategy report that reflects the actual building constructed. It will be necessary for the contractor to update the design fire strategy as this stage.

The Fire Surgery are likely to undertake this work on behalf of the contractor for the duration of RIBA Stage 5.

11.3 Fire Safety Management

Fire safety in buildings is a balance between the technical systems within the building and how the building is then used and managed. It is not possible to rely solely on the technical provisions in the building, and an active role on the part of the management is essential. It is therefore necessary that the building is used as intended in the fire strategy report and that the systems are managed appropriately.

As with all buildings, there will be standard fire safety management requirements for the day to day operation of the building. It is a fundamental assumption that features described within the fire strategy will require management and maintenance throughout the life of the building.

Managing fire safety is a process that lasts throughout the life of a building, starting with the initial design, which is intended both to minimize the incidence of fire and to ensure that if a fire does occur, appropriate fire safety systems (including active, passive and procedural systems) are in place and are fully functional.

Effective management of fire safety can contribute to the protection of the building occupants in many ways:

-  By working to prevent fires occurring in the first place,

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- 🌱 By monitoring the fire risk on an on-going basis and taking appropriate action to eliminate or reduce risk,
- 🌱 By ensuring that all the fire safety measures in the building are kept in working order and that the means of escape are always available,
- 🌱 By providing adequate means for the fire service to effectively gain access to the building should a fire occur,
- 🌱 By updating the Fire Strategy for changes in the use of the building.

Upon completion, the building owners or managers (including tenants) will need to undertake fire risk assessments and have these available for inspection by the fire service at any time. This should typically be undertaken annually by a competent person or when there are significant changes in the building and is carried out to ensure that the fire strategy is upheld throughout the life of the building and that the risk of fire is kept low.

To assist with the ongoing fire safety management, The Fire Surgery have developed a strategy of using coloured text in the fire strategy reports that highlights items/ issues that need to be considered specifically by the fire safety management and as part of any fire risk assessments for this building.

For this specific building, management areas that are of particular importance for the longevity of the proposed fire safety design solutions include:

- 🌱 Implementation and maintenance of an 'Adequate' fire safety management Level 2 system to BS 9999: 2017 by all responsible persons for the building.
- 🌱 Disabled person evacuation procedures.
- 🌱 Allocation of appropriate assembly points.
- 🌱 Management, monitoring, and maintenance of all fire safety systems, and in particular the automatic fire detection and alarm systems, and the fire main and fire and smoke curtains.
- 🌱 Provision of appropriate premises information for the fire service.
- 🌱 Co-operation and co-ordination between the responsible persons for the building (landlord/ tenants) in regard to fire safety matters relevant to the building, including ensuring that emergency plans are co-ordinated and consistent with one another.
- 🌱 Maintenance of the irrigation system to the green roof.

12 Summary

This Fire Statement has been produced to support the planning application for Twickenham Studios with emphasis on the new development of Block A and wider consideration to the other refurbished blocks. The fire statement is outlined as required by the New London Plan Policy D12, which requires development proposals to achieve the highest standards of fire safety, embedding these at the earliest possible stage.

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This Fire Statement is a standalone document which defines the fire safety objectives and performance requirements of a development, and the methods by which these objectives will be provided/ satisfied.

The Fire Statement has evidenced the provisions made for the safety of occupants and protection of property as well as the provision of suitable access and equipment for firefighting in light of London Plan fire safety policy requirements and the justification for these measures as described below:

- 🌿 The fire statement and subsequent fire strategy for Block A and the site has been developed by competent fire engineers who are Chartered with The Institution of Fire Engineers.
- 🌿 The fire safety objectives have been identified which include compliance with Part B of the Building Regulations performance recommendations.
- 🌿 The fire safety guidance documents used have been identified with the principal guidance document being BS 9999: 2017.
- 🌿 The building materials have been identified which are in accordance with the Building Regulations.
- 🌿 The safe means of escape has been documented including the simultaneous evacuation strategy based on a single knock regime. There is an adequate number and location of escape stairs for the anticipated occupancy and to meet travel distance limitations.
- 🌿 The means of escape for wheelchair users has been clarified including the use of evacuation lift to satisfy the requirements of the London Plan Policy D5(B5). The new stair and lift for Blocks E and H will be fire protected and can be used for means of escape. The new lifts will be designed as an evacuation lift to BS 9999 2017 to comply with policy D5.
- 🌿 The Green roof and timber decking will be designed to comply with appropriate guidance.
- 🌿 PV shut off will be provided at the ground floor stair.
- 🌿 Access and facilities for the fire service has been outlined including a dry fire main in the escape stair.
- 🌿 The consistency in fire safety has been demonstrated to meet the Golden thread by virtue of The Fire Surgery's involvement in the development of the fire strategy and the future appointments through construction to support regulation 38 of the building regulations and allow the users of the building to execute their responsibilities for fire safety under the Regulatory Reform (Fire Safety) Order 2005 which is the legislation for fire safety in occupied buildings.

The Fire Surgery believe this fire statement meets the requirements of the London Plan Policy D12.