

25th April 2022

FAO: Planning Department Richmond Council
cc the London Fire Brigade

The Beaufort Rd Residents' Association wish to make a formal objection (sec 2.3.4 Fig 2 London Plan Guidance) to the Fire Safety Strategy Document submitted by OFR Consultants Limited, 5-8 Roberts Place, London EC1R 0BB Project Number: LO21109 Ref: Marble Hill Play Centre, Richmond Council Planning Application Number 21/0847/FUL.

Could you please respond as per the third-party objection process detailed in the London Plan 2.3.4 Fig 2

1) Scope, Intent and General Compliance

This report does not comply with all of the important objectives for having a PFSS report completed prior to a Planning decision. The author also makes references to work that can be completed "at the next design stage" and quotes the Architect's guidance that the design is "work in progress". This is not true. The Planning Application in question is for a Full, not Outline Planning Application. The initial plans were submitted on the 8th March 2021, there have been no structural building updates to these plans since that time and a decision is due to be made by the Council on the current plans soon. We also note as per the Councils Local Plan 4.3.6 *Outline planning applications will not be accepted within Conservation Areas because the character, appearance and distinctiveness of those areas can be dependent on the detail of developments.*

There cannot be any doubt or potential waiver of responsibility for anyone involved in ensuring Fire Safety guidance for a building that will provide a 2 storey 800sq metres facility for children, some of whom are disabled. This report should be withdrawn and re-submitted on the basis that the structural external building designs and plot location are final and the correct level of compliance as per the FSS requirements should be provided now without deferring crucial observations and risk notification factors to a future post planning consent date.

2) Points of concern and non-compliance related to the London Plan Guidance D12A

Does the PFSS set out the relevant qualifications and experience of the author, proportionate to the development?

The document does not reference the author's experience or qualifications

For larger and more complex schemes it is also advised that the author of the PFSS is a registered fire engineer and has the competency to progress the PFSS to a full fire strategy (where required) and maintain oversight of the fire safety considerations throughout the development

For a building of such significance hosting disabled children, the "Golden Thread" principle must be assured with a registered Fire Engineer assigned to this project at this early stage?

3) Vehicle Access

3.1.1 London Plan

The PFSS should identify areas where fire and rescue service pumping appliances can be sited. Ideally areas should be identified on the development site so that they remain in the control of the development. Where this is not possible, the PFSS should set out the implications of not having control of this area and any proposed mitigation measures such as obtaining the agreement of the landowner to keep the area clear for emergencies. The PFSS should also identify suitable access routes into and out of the development, both during construction phase and occupation.

This proposed development is in a Grade 2 listed park with protected view for a Grade 1 listed house 300m away. It is highly unlikely any new roads or extensions to adjacent car parks can be built. As part of the Planning submission, a justification is made to increase the density of car parking spaces within the current car park. Recently English Heritage have installed a public toilet facility within the car park, near to the access road entrance. The access road to the facility can quite often be congested with park users parking their cars on the access road which would potentially block access to Fire vehicles (see photo below). By expanding the Play Centre and all of the other facilities in the Park, the parking and access problems for Fire vehicles will only increase.



Parking on the Access road within the park

The outline design and plot location of the building is final. No changes have been made to the design since the original plans were submitted and therefore the access requirements and associated risks can and should be determined accurately now to discover and register any material issues before Planning consent is given.

Report Observations – Vehicle Access

The adjacent Car Park and access road are owned by English Heritage and no reference is made to the implications of not having control of this area or it being kept clear for emergencies.

The report references Beaufort Rd (a private road) as a Fire access route but does not set out the implications of not having control of this area and any proposed mitigation measures such as obtaining the agreement of the landowner to keep the area clear for emergencies. No reference is made to the 3-meter-high wall at the end of Beaufort Rd blocking access to the proposed facility located 13 metres away from this wall. See photo below



Wall at the end of Beaufort Rd

No reference is made to any potential access routes during construction.

Fig 10 is confusing showing a Red access line for an appliance route to be taken to the perimeter of the building and yet as per the London Plan any dead end can only be reversed down for 20 metres maximum?

The report notes - *For the building, all areas are to be accessed directly off the street and are to be provided with a minimum of 15% perimeter access, as per guidance recommendations of BS 9999 for a small building less than 11m in height. This is to be confirmed at the next stage of the design.*

We fail to see why this material issue is not given due consideration now given the fixed outline design of the building and the potential access complications.

4) External Spread of Fire

The drawing in Fig 8 is not clear. The brown boundary shading does not clearly reference the proposed outline of the new building on the Case 2 side (north side). Also the two large awnings proposed by the Architect (seen in Figs 1, 5, 6 and 7) on the North side of the building are not detailed in Fig 8. These two awnings extend towards the North boundary by approx. 3m and for a width of 4-6m. The large trees at the North boundary (fig 2 proposed landscape) are also not referenced and the foliage from these trees extends from the North side of the building and awnings to the adjacent Beaufort Rd properties. Should this not be covered as a risk in Case 2?