

# Fire statement form

Application information	
1. Site address line 1	Stag Brewery Site
Site address line 2	Mortlake
Site address line 3	Richmond Upon Thames
Town	London
County	Greater London
Site postcode (optional)	
2. Description of proposed development including any change of use (as stated on the application form):	<p>This Fire Strategy Gateway 1 statement has been prepared by Hoare Lea Fire Engineering on behalf of Reselton Properties Limited (“the Applicant”) in support of two linked planning applications (“the Applications”) for the comprehensive redevelopment of the former Stag Brewery Site in Mortlake (“the Site”) within the London Borough of Richmond Upon Thames (LBRuT).</p> <p><b>Proposals</b></p> <p>The applications seek planning permission for</p> <p><u>Application A</u></p> <p>“Hybrid application to include the demolition of existing buildings to allow for comprehensive phased redevelopment of the site:</p> <p>Planning permission is sought in detail for works to the east side of Ship Lane which comprise:</p> <ol style="list-style-type: none"> <li>a) Demolition of existing buildings (except the Maltings and the façade of the Bottling Plant and former Hotel), walls, associated structures, site clearance and groundworks</li> <li>b) Alterations and extensions to existing buildings and erection of buildings varying in height from 3 to 9 storeys plus a basement of one to two storeys below ground</li> <li>c) Residential apartments</li> <li>d) Flexible use floorspace for:               <ol style="list-style-type: none"> <li>i. Retail, financial and professional services, café/restaurant and drinking establishment uses</li> <li>ii. Offices</li> <li>iii. Non-residential institutions and community use</li> <li>iv. Boathouse</li> </ol> </li> </ol>

- e) Hotel / public house with accommodation
- f) Cinema
- g) Offices
- h) New pedestrian, vehicle and cycle accesses and internal routes, and associated highway works
- i) Provision of on-site cycle, vehicle and servicing parking at surface and basement level
- j) Provision of public open space, amenity and play space and landscaping
- k) Flood defence and towpath works
- l) Installation of plant and energy equipment
- m) Planning permission is also sought in outline with all matters reserved for works to the west of Ship Lane which comprise:
  - i. The erection of a single storey basement and buildings varying in height from 3 to 8 storeys
  - ii. Residential development
  - iii. Provision of on-site cycle, vehicle and servicing parking
  - iv. Provision of public open space, amenity and play space and landscaping
  - v. New pedestrian, vehicle and cycle accesses and internal routes, and associated highways works”

#### Application B

“Detailed planning permission for the erection of a three-storey building to provide a new secondary school with sixth form; sports pitch with floodlighting, external MUGA and play space; and associated external works including landscaping, car and cycle parking, new access routes and other associated works”

Together, Applications A and B described above comprise the ‘Proposed Development’.

#### **Background for submission**

The Applications follow earlier planning applications which were refused by the Greater London Authority. The refused applications were for:

- a) Application A – hybrid planning application for comprehensive mixed use redevelopment of the former Stag Brewery site consisting of:
  - i. Land to the east of Ship Lane applied for in detail (referred to as ‘Development Area 1’ throughout); and
  - ii. Land to the west of Ship Lane (excluding the school) applied for in outline (referred to as ‘Development Area 2’ throughout).
- b) Application B – detailed planning application for the school (on land to the west of Ship Lane).
- c) Application C – detailed planning application for highways and landscape works at Chalkers Corner.

The LBRuT (the Council) originally resolved to grant planning permission for Applications A and B but refuse Application C.

Following the LBRuT's resolution to approve the applications A and B, the Mayor called-in the applications and became the determining authority. The Mayor's reasons for calling in the applications were set out in his Stage II letter (dated 4 May 2020) but specifically related to concerns regarding what he considered was a low percentage of affordable housing being proposed for the Site and the need to secure a highways solution for the scheme following the LBRuT's refusal of Application C.

Working with the Mayor's team, the Applicant sought to meaningfully respond to the Mayor's concerns on the applications. A summary of the revisions to the scheme made and submitted to the GLA in July 2020 is as follows:

- i. Increase in residential unit provision from up to 813 units to up to 1,250 units;
- ii. Increase in affordable housing provision from (up to) 17%, to 30%;
- iii. Increase in height for some buildings of up to three storeys;
- iv. Change to the layout of Blocks 18 and 19, conversion of Block 20 from a terrace row of housing to two four storey buildings;
- v. Reduction in the size of the western basement, resulting in an overall car parking spaces reduction of 186 spaces and introduction of an additional basement storey under Block 1;
- vi. Internal layout changes and removal of the nursing home and assisted living in Development Area 2;
- vii. Landscaping amendments, including canopy removal of four trees on the north west corner of the Site; and
- viii. Alternative options to Chalkers Corner in order to mitigate traffic impacts through works to highway land only and allow the withdrawal of Application C.

Application A was amended to reflect these changes.

Notwithstanding this, and despite GLA officers recommending approval, the Mayor refused the applications in August 2021.

The Mayor's reasons for refusal in respect of Application A were:

- i. height, bulk and mass, which would result in an unduly obtrusive and discordant form of development in this 'arcadian' setting which would be harmful to the townscape, character and appearance of the surrounding area;
- ii. heritage impact. The proposals, by reason of its height, scale, bulk and massing would result in less than substantial harm to the significance of several listed buildings and conservation areas in the vicinity. The

- Mayor considered that the less than substantial harm was not clearly and convincingly outweighed by the public benefits, including Affordable Housing, that the proposals would deliver;
- iii. neighbouring amenity issues. The proposal, by reason of the excessive bulk, scale and siting of Building 20 and 21 in close proximity to the rear of neighbouring residential properties in Parliament Mews and the rear gardens of properties on Thames Bank, would result in an unacceptable overbearing and unneighbourly impact, including direct overlooking of private amenity spaces. The measures in the Design Code would not sufficiently mitigate these impacts; and
  - iv. no section 106 agreement in place.

Application B was also refused because it is intrinsically linked with Application A and therefore could not be bought forward in isolation.

### **The Proposed New Scheme**

This 3<sup>rd</sup> iteration of the scheme seeks to respond directly to the Mayors' reasons for refusal and in doing so also addresses a number of the concerns raised by the LBRuT.

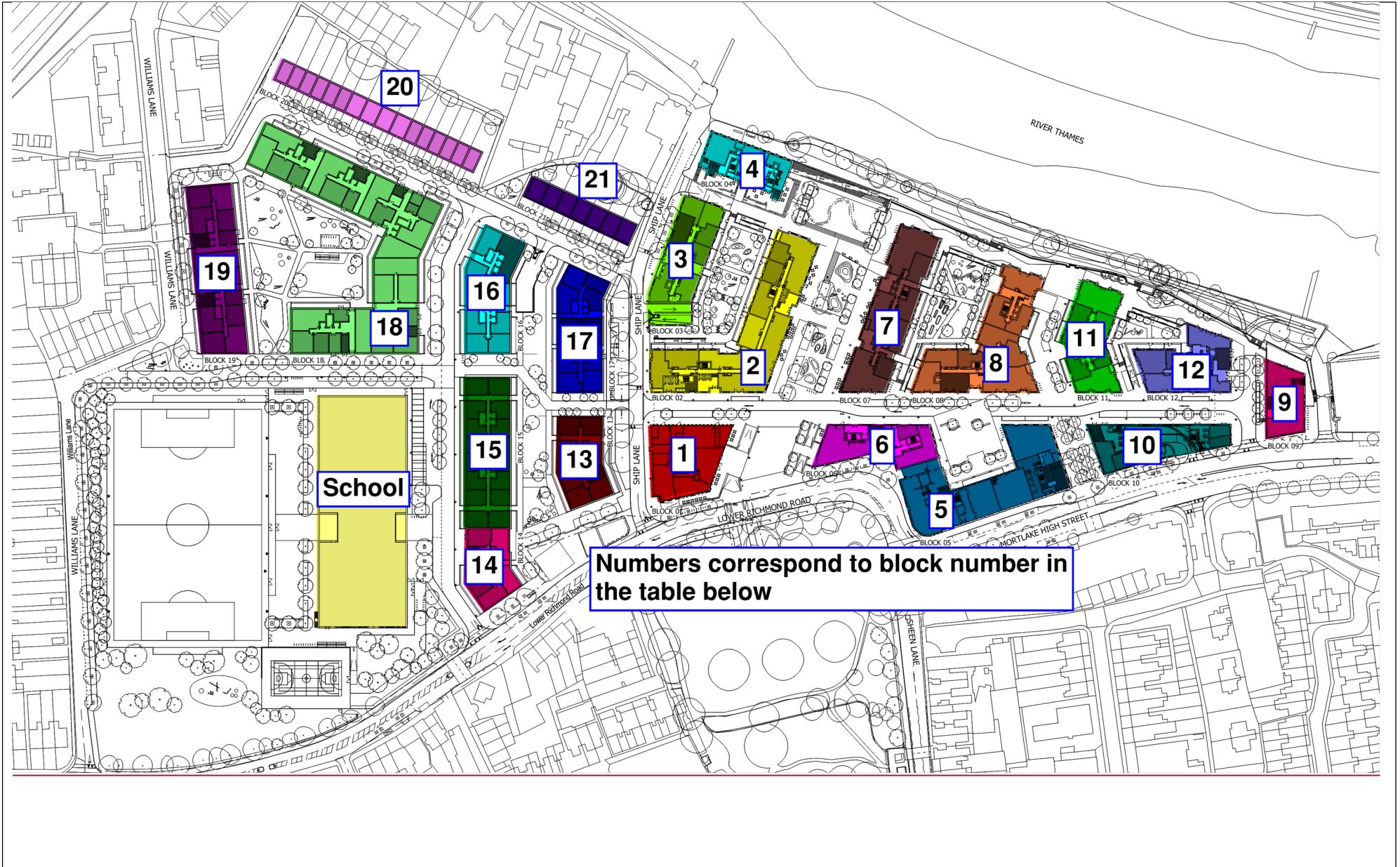
The amendments can be summarised as follows:

- i. A revised energy strategy is proposed in order to address the London Plan (2021) requirements;
- ii. Several residential blocks have been reduced in height to better respond to the listed buildings along the Thames riverfront and to respect the setting of the Maltings building, identified as a Building of Townscape Merit (BTM) by the LBRuT;
- iii. Reconfiguration of layout of Buildings 20 and 21 has been undertaken to provide lower rise buildings to better respond to the listed buildings along the Thames riverfront; and
- iv. Chalkers Corner light highways mitigation works.

The school proposals (submitted under 'Application B') are unchanged. The Applicant acknowledges LBRuT's identified need for a secondary school at the Site and the Applications continue to support the delivery of a school. It is expected that the principles to be agreed under the draft Community Use Agreement (CUA) will be the same as those associated with the refused school application (LBRuT ref: 18/0548/FUL, GLA ref: GLA/4172a/07).

Overall, it is considered that together, the Applications respond successfully to the concerns raised by the GLA which also reflect some of the concerns raised by stakeholders in respect of the previous schemes and during pre-application discussions on the revised Proposed Development. As a result, it is considered that the scheme now represents a balanced development that delivers the principle LBRuT objectives from the Site.

<p><b>3. Name of person completing the fire statement (as section 15.), relevant qualifications and experience.</b></p> <p>Guide: no more than 200 words</p>	<p>All Hoare Lea design projects are headed by chartered engineers with proven experience on a wide range of fire safety consultancy projects. All work produced at Hoare Lea has been reviewed and approved by a senior chartered fire engineer.</p> <p>This statement has been produced, reviewed and approved by the following key individuals. The design and development of the fire safety strategy will be undertaken by the same individuals.</p> <ul style="list-style-type: none"> <li>- Miller Hannah BEng (Hons), CEng, MIFireE – Director</li> <li>- Eric Swainson MEng (Hons), AIFireE – Principal Fire Engineer</li> <li>- Aron Fransson BSc, MSc – Graduate Fire Engineer</li> </ul>
<p><b>4. State what, if any, consultation has been undertaken on issues relating to the fire safety of the development; and what account has been taken of this.</b></p> <p>Guide: no more than 200 words</p>	<p>A formal consultation was taken with the Health and Safety executive as part of the Planning Gateway One process. As part of this process several concerns were raised by the HSE as part of their substantive response. The design has been updated to address these comments and a document detailing the response to each comment has been included as part of this submission.</p> <p>The scheme and proposed fire strategy will be developed in greater detail following this planning application at which point the Statutory Authorities will be fully engaged.</p> <p>A fire statement was issued to the local authority as part of the previous planning application for this scheme, however, no fire specific comments were provided on this application.</p>
<p><b>5. Site layout plan with block numbering as per building schedule referred to in 6.</b> (consistent with other plans drawings and information submitted in connection with the application)</p>	
<p>Site layout plan is: inserted in the form</p>	



**The principles, concepts and approach relating to fire safety that have been applied to the development**

**6. Building schedule**

Site information				Building information			Resident safety information		
a) block no. as per site layout plan above	b) • block height (m) • number of storeys excluding those below ground level • number of storeys including those below ground level	c) proposed use (one per line)	d) location of use within block by storey	e) standards relating to fire safety/ approach applied	f) balconies	g) external wall systems	h) approach to evacuation	i) automatic suppression	j) accessible housing provided
1	<ul style="list-style-type: none"> <li>▪ 14.3</li> <li>▪ 4</li> <li>▪ 6</li> </ul>	office, cinema	Level 1 and above is office use, Ground Floor and Basement for Cinema	BS9999	no balconies	worse than class A2-s1, d0	simultaneous	none	N/A non resi
2	<ul style="list-style-type: none"> <li>▪ 27.8</li> <li>▪ 9</li> <li>▪ 10</li> </ul>	residential flats, maisonettes, studios	residential with flexible space at ground	BS9991	class A2-s1, d0 or better	class A2-s1, d0 or better	stay put	yes- residential sprinklers, full	M4(3)
3	<ul style="list-style-type: none"> <li>▪ 17.5</li> <li>▪ 6</li> <li>▪ 7</li> </ul>	residential flats,	residential use throughout	BS9991	class A2-s1, d0 or better	class A2-s1, d0 or better	stay put	yes- residential	M4(3)

		maisonettes, studios						sprinklers, full	
4	<ul style="list-style-type: none"> <li>▪ 24.4</li> <li>▪ 8</li> <li>▪ 8</li> </ul>	residential flats, maisonettes, studios	residential with flexible space at ground	BS9991	no balconies	class A2-s1, d0 or better	stay put	yes-residential sprinklers, full	M4(3)
5	<ul style="list-style-type: none"> <li>▪ 8.6</li> <li>▪ 3</li> <li>▪ 4</li> </ul>	Hotel, office	Hotel levels Ground-3, office levels Ground -3	Approved document B vol 2	worse than class A2-s1, d0	worse than class A2-s1, d0	simultaneous	none	N/A non resi
6	<ul style="list-style-type: none"> <li>▪ 15.1</li> <li>▪ 5</li> <li>▪ 6</li> </ul>	residential flats, maisonettes, studios	residential with flexible space at ground	BS9991	class A2-s1, d0 or better	class A2-s1, d0 or better	stay put	yes-residential sprinklers, full	M4(3)
7	<ul style="list-style-type: none"> <li>▪ 27.8</li> <li>▪ 9</li> <li>▪ 10</li> </ul>	residential flats, maisonettes, studios	residential with flexible space at ground	BS9991	class A2-s1, d0 or better	class A2-s1, d0 or better	stay put	yes-residential sprinklers, full	M4(3)
8	<ul style="list-style-type: none"> <li>▪ 27.4</li> <li>▪ 9</li> <li>▪ 10</li> </ul>	residential flats, maisonettes, studios	residential with flexible space at ground	BS9991	class A2-s1, d0 or better	class A2-s1, d0 or better	stay put	yes-residential sprinklers, full	M4(3)
9	<ul style="list-style-type: none"> <li>▪ 15.7</li> <li>▪ 5</li> <li>▪ 5</li> </ul>	residential flats, maisonettes, studios	residential with flexible space at ground	BS9991	worse than class A2-s1, d0	worse than class A2-s1, d0	stay put	yes-residential sprinklers, full	M4(3)



10	<ul style="list-style-type: none"> <li>▪ 18.1</li> <li>▪ 6</li> <li>▪ 6</li> </ul>	residential flats, maisonettes, studios	residential with flexible space at ground	BS9991	class A2-s1, d0 or better	class A2-s1, d0 or better	stay put	yes-residential sprinklers, full	none
11	<ul style="list-style-type: none"> <li>▪ 24.1</li> <li>▪ 8</li> <li>▪ 9</li> </ul>	residential flats, maisonettes, studios	residential with flexible space at ground	BS9991	class A2-s1, d0 or better	class A2-s1, d0 or better	stay put	yes-residential sprinklers, full	M4(3)
12	<ul style="list-style-type: none"> <li>▪ 24.1</li> <li>▪ 8</li> <li>▪ 9</li> </ul>	residential flats, maisonettes, studios	residential with flexible space at ground	BS9991	class A2-s1, d0 or better	class A2-s1, d0 or better	stay put	yes-residential sprinklers, full	M4(3)
13	<ul style="list-style-type: none"> <li>▪ 19</li> <li>▪ 6</li> <li>▪ 7</li> </ul>	residential flats, maisonettes, studios	residential throughout ancillary residential at ground	BS9991	class A2-s1, d0 or better (if balconies are provided)	class A2-s1, d0 or better	stay put	yes-residential sprinklers, full	M4(3)
14	<ul style="list-style-type: none"> <li>▪ 19</li> <li>▪ 6</li> <li>▪ 6</li> </ul>	residential flats, maisonettes, studios	residential throughout ancillary residential at ground	BS9991	class A2-s1, d0 or better (if balconies are provided)	class A2-s1, d0 or better	stay put	yes-residential sprinklers, full	M4(3)
15	<ul style="list-style-type: none"> <li>▪ 27.0</li> <li>▪ 8</li> <li>▪ 9</li> </ul>	residential flats, maisonettes, studios	residential throughout ancillary residential at ground	BS9991	class A2-s1, d0 or better (if balconies are provided)	class A2-s1, d0 or better	stay put	yes-residential sprinklers, full	M4(3)
16	<ul style="list-style-type: none"> <li>▪ 19.0</li> <li>▪ 6</li> <li>▪ 7</li> </ul>	residential flats, maisonettes, studios	residential throughout ancillary residential at ground	BS9991	class A2-s1, d0 or better (if balconies are provided)	class A2-s1, d0 or better	stay put	yes-residential sprinklers, full	M4(3)

17	<ul style="list-style-type: none"> <li>▪ 23.6</li> <li>▪ 7</li> <li>▪ 8</li> </ul>	residential flats, maisonettes, studios	residential throughout	BS9991	class A2-s1, d0 or better (if balconies are provided)	class A2-s1, d0 or better	stay put	yes-residential sprinklers, full	M4(3)
18	<ul style="list-style-type: none"> <li>▪ 19.0</li> <li>▪ 6</li> <li>▪ 6</li> </ul>	residential flats, maisonettes, studios	residential throughout	BS9991	class A2-s1, d0 or better (if balconies are provided)	class A2-s1, d0 or better	stay put	yes-residential sprinklers, full	M4(3)
19	<ul style="list-style-type: none"> <li>▪ 13.0</li> <li>▪ 4</li> <li>▪ 4</li> </ul>	residential flats, maisonettes, studios	residential throughout	BS9991	worse than class A2-s1, d0	worse than class A2-s1, d0	stay put	yes-residential sprinklers, full	M4(3)
20	<ul style="list-style-type: none"> <li>▪ 9.4</li> <li>▪ 3</li> <li>▪ 3</li> </ul>	residential flats, maisonettes, studios	residential throughout	BS9991	worse than class A2-s1, d0	worse than class A2-s1, d0	stay put	yes-residential sprinklers, full	none
21	<ul style="list-style-type: none"> <li>▪ 9.4</li> <li>▪ 3</li> <li>▪ 3</li> </ul>	residential flats, maisonettes, studios	residential throughout	BS9991	worse than class A2-s1, d0	worse than class A2-s1, d0	stay put	yes-residential sprinklers, full	none
School	<ul style="list-style-type: none"> <li>▪ &lt;18</li> <li>▪ 3</li> <li>▪ 3</li> </ul>	school	school	BB100	worse than class A2-s1, d0	worse than class A2-s1, d0	simultaneous	yes-residential sprinklers, full	N/A non resi

Note 1: For blocks 13-21 are currently designed as outline only and do not yet have set floor levels. As such the height of the top occupied storey has been assumed based on 3m below the parapet height provided by Squire & Partner Architects.

#### 7. Specific technical complexities

Explain any specific technical complexities in terms of fire safety (for example green walls) and/or departures from information in building schedule above

Guide: no more than 500 words

All blocks (both residential and non-residential) with a top occupied storey 18m above fire service access level will be provided with fully fitted firefighting shafts. In addition, Block 1 (cinema/office) will also be provided with a fully fitted firefighting shaft. It is recommended that the development is to have management on site 24/7. This could be provided via a fire control centre that covers the whole development. In order to facilitate the use of the evacuation lift all of the residential stairs should be provided with refuge spaces with minimum dimensions of 900mm x 1400mm outside of clear escape width of the stair. The refuge should be provided with an emergency voice communication (EVC) system, designed and installed in accordance with BS 5839-9:2011.

All stairs serving the basement carpark will be completely independent from the stairs serving the residential levels with no internal connections. The lifts serving the basement carpark are independent from the lifts serving the residential levels. The lifts serving the basement carpark will open into a lobby which is fire separated from the areas in which the lifts serving the above ground levels open into. This is in line with the recommendations in current guidance and comments from the HSE.

**Residential blocks:**

- Blocks No. 2, 4 and 6-12 are provided with flexible space at ground level. These spaces will adopt a simultaneous evacuation strategy and will not communicate with the means of escape facilities for the residential areas. The apartments will operate a stay-put evacuation strategy.
- Common corridors should be provided with natural or mechanical smoke ventilation system. In corridors with extended travel distances (maximum single direction <30m), additional mechanical smoke ventilation shafts will be provided as part of a fire engineered solution.

**Hotel/Office:** The hotel/office building (Block 5) will be served by a minimum of two means of escape stairs and will operate a simultaneous evacuation strategy. The final escape route from each stair will lead directly to the outside or via a fire sterile corridor afforded the same level of fire resistance as the stair itself.

**Office/Cinema:** The office/cinema building (Block 1) is to be provided with one protected means of escape stair and one firefighting stair. Disabled refuges are to be provided on all escape routes where level egress to the outside is not available. The final escape routes from each stair will lead directly to the outside or via a fire sterile corridor afforded the same level of fire resistance as the stair itself.

**School:** The school will be provided with a minimum of two escape stairs serving every level. These stairs will be provided with a protected lobby separating them from the accommodation on every level. The final escape routes from each stair will discharge directly to the outside or via a fire sterile corridor afforded the same level of fire resistance as the stair itself and disabled refuges are to be provided on all escape routes where level egress to the outside is not available.

**Carpark:** Each of the carparks will be provided with a smoke ventilation system and will operate a simultaneous evacuation strategy independent from the residential levels above. The carpark will be located below ground and connected to blocks 2,3,6,7,8,11 and 12 although the stairs will be completely separate from the residential stairs serving the blocks above. A second carpark will be located below ground and connected to blocks 13,15,16 and 17 again the stairs will be completely separate from the residential stairs serving the blocks above.

**8. Issues which might affect the fire safety of the development**

Explain how any issues which might affect the fire safety of the development have been addressed.

Guide: no more than 500 words

- Certain residential blocks contain flexible use areas at ground level and are therefore to be fully separated from residential without sharing means of escape facilities.
- Residential buildings will be provided with smoke ventilation in the common corridors in order to ensure that the corridors remain tenable in case of a fire in a flat. Certain corridors have extended travel distances in a single direction and is addressed with a fire engineered justification including the provision of additional smoke ventilation. It is noted that the HSE raised concerns with proposed extended travel distances and as such it is proposed to carry out a preliminary QDR focusing on the extended travel distances at this stage of the design. As the design for the building develops a full QDR can be carried out considering all aspects of the development (not just the extended corridor travel distances).
- Residential flats will be designed as open plan and a fire engineered justification on the basis of sprinkler protection and enhanced detection will be developed to address this.
- Final exits serving stairs will be accessed via protected passageways. These will be treated as an extension of the stair and if they form a reception area, this area will be kept fire sterile.
- All stairs serving the basement carpark will be completely independent from the stairs serving the residential levels with no internal connections.
- The lifts serving the basement carpark are independent from the lifts serving the residential levels. The lifts serving the basement carpark will open into a lobby which is fire separated from the areas in which the lifts serving the above ground levels open into.
- The hotel/office building is a multi-use building and as such the means of escape from the hotel will be simultaneous with the office accommodation in the same block.
- All refuse stores are accessed from external only. This is based on concerns raised by the HSE in the initial application with regards to access to the refuse stores internally.
- The cinema/office buildings is a multi-use building and as such the means of escape from the cinema will be simultaneous with the office accommodation in the same block.

### **9. Local development document policies relating to fire safety**

Explain how any policies relating to fire safety in relevant local development documents have been taken into account.

Guide: no more than 500 words

Full application of the recommendations of the London Plan (March 2021) Policies D12 and D5, with a separate fire statement produced for that purpose.

### **Emergency road vehicle access and water supplies for firefighting purposes**

### **10. Fire service site plan**

Explanation of fire service site plan(s) provided in 14. including what guidance documents have informed the proposed arrangements for fire service access and facilities?

Guide: no more than 200 words

Access for fire-fighting appliances is provided to all buildings. Guidance of BS 9991, ADB Volume 2 and BB100 has been used for this aspect of the fire strategy and access to the dry riser inlets will be provided within 18m from the fire tender locations.

**11. Emergency road vehicle access**

Specify emergency road vehicle access to the site entrances indicated on the site plan

Guide: no more than 200 words

Public roads serving all buildings. The building entrances will be located in such a way that access is available as close to the road as possible.

Is the emergency vehicle tracking route within the site to the siting points for appliances clear and unobstructed?

yes

**12. Siting of fire appliances**

Guide: no more than 200 words

Directly adjacent to the blocks, within either 45m of all points within the building, or within 18m of dry riser inlet points where the 45m hose laying distances from the fire tender parking positions are not achieved.

**13. Suitability of water supply for the scale of development proposed**

Guide: no more than 200 words

Some existing public hydrants are provided within 90m of all blocks. Where this is not the case, additional private hydrants will be provided.

The locations of the existing hydrants are provided and attached to the responses to the HSEs substantive response (ref: MEM-1920618-02-ES-20220720-HSE Responses-Rev02). It is noted that the design has not yet progressed to a stage where the location of new hydrants has been provided as the general landscape design is still in an early stage. However, the provision of hydrants within the requirements of current code guidance; within 90m of the dry riser inlet to each block can be made a condition of the planning application.

Note that as the design is developed further new hydrants will be provided such that the maximum distance of 90m to all blocks is not exceeded.

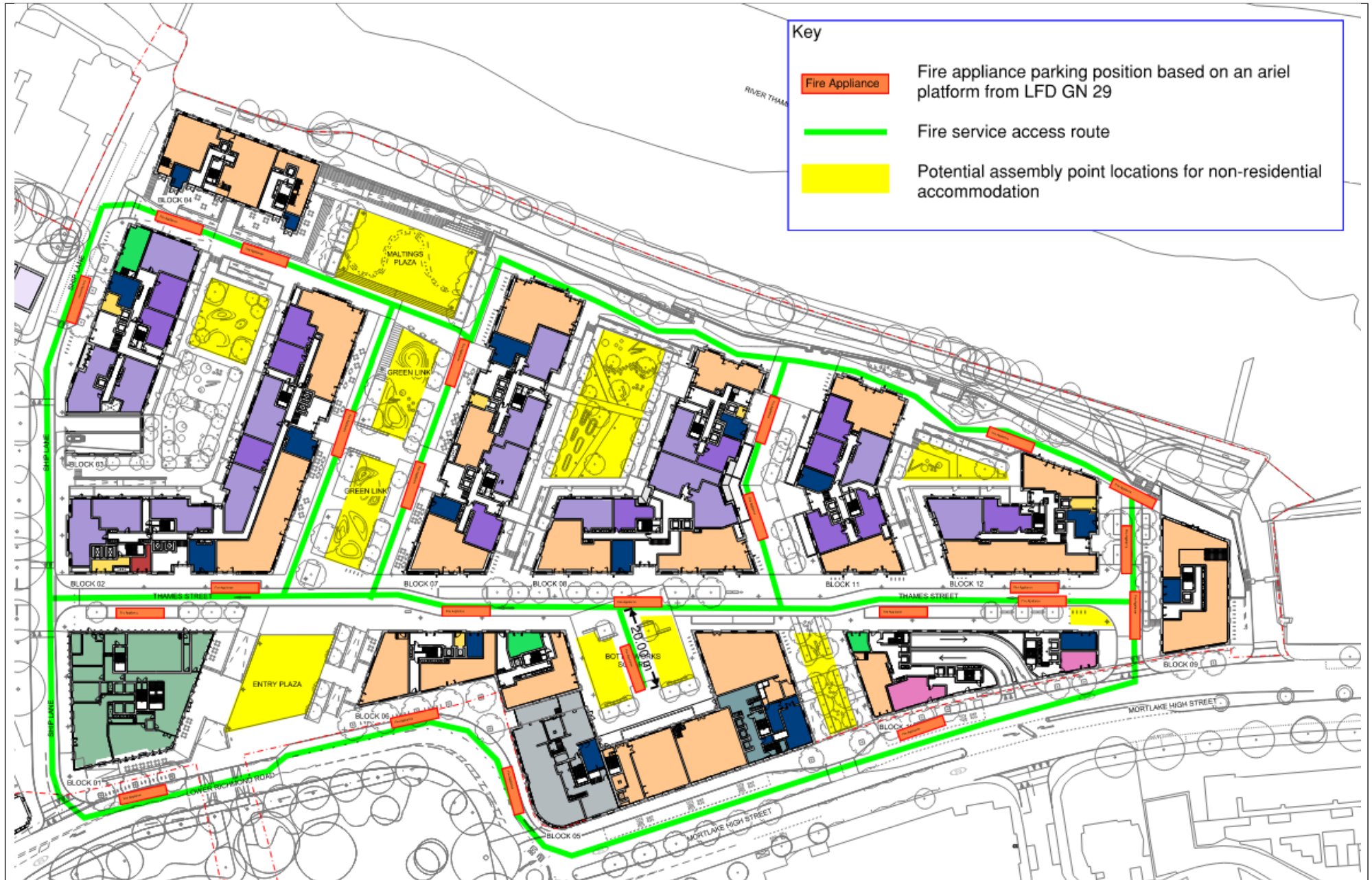
Nature of water supply:  
hydrant- public

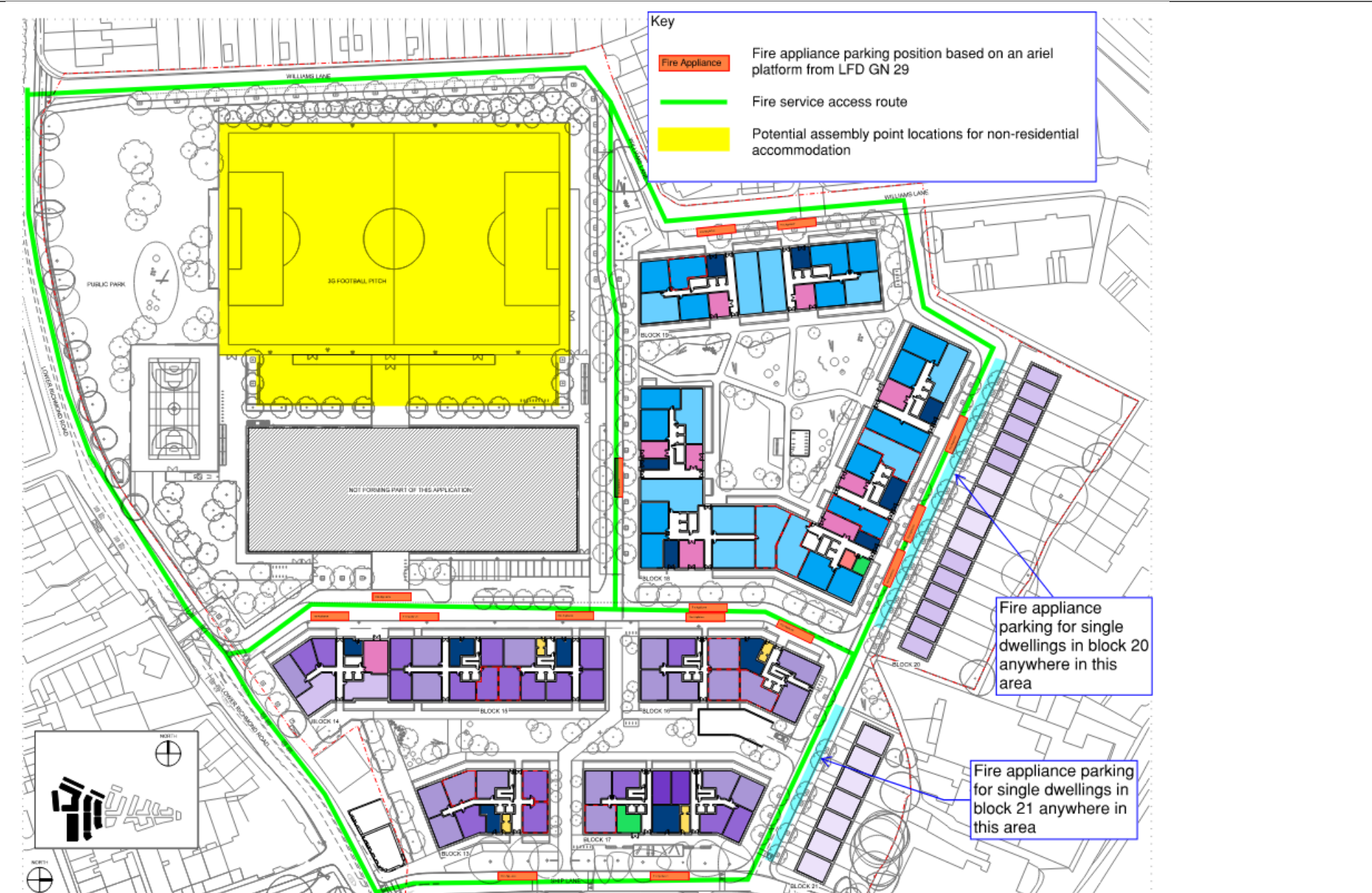
Does the proposed development rely on existing hydrants and if so are they currently usable / operable?

don't know

**14. Fire service site plan**

Fire service site plan is:  
inserted in the form  
See following page



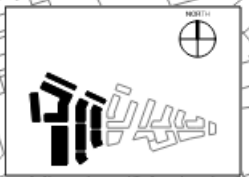


**Key**

- Fire appliance parking position based on an ariel platform from LFD GN 29
- Fire service access route
- Potential assembly point locations for non-residential accommodation

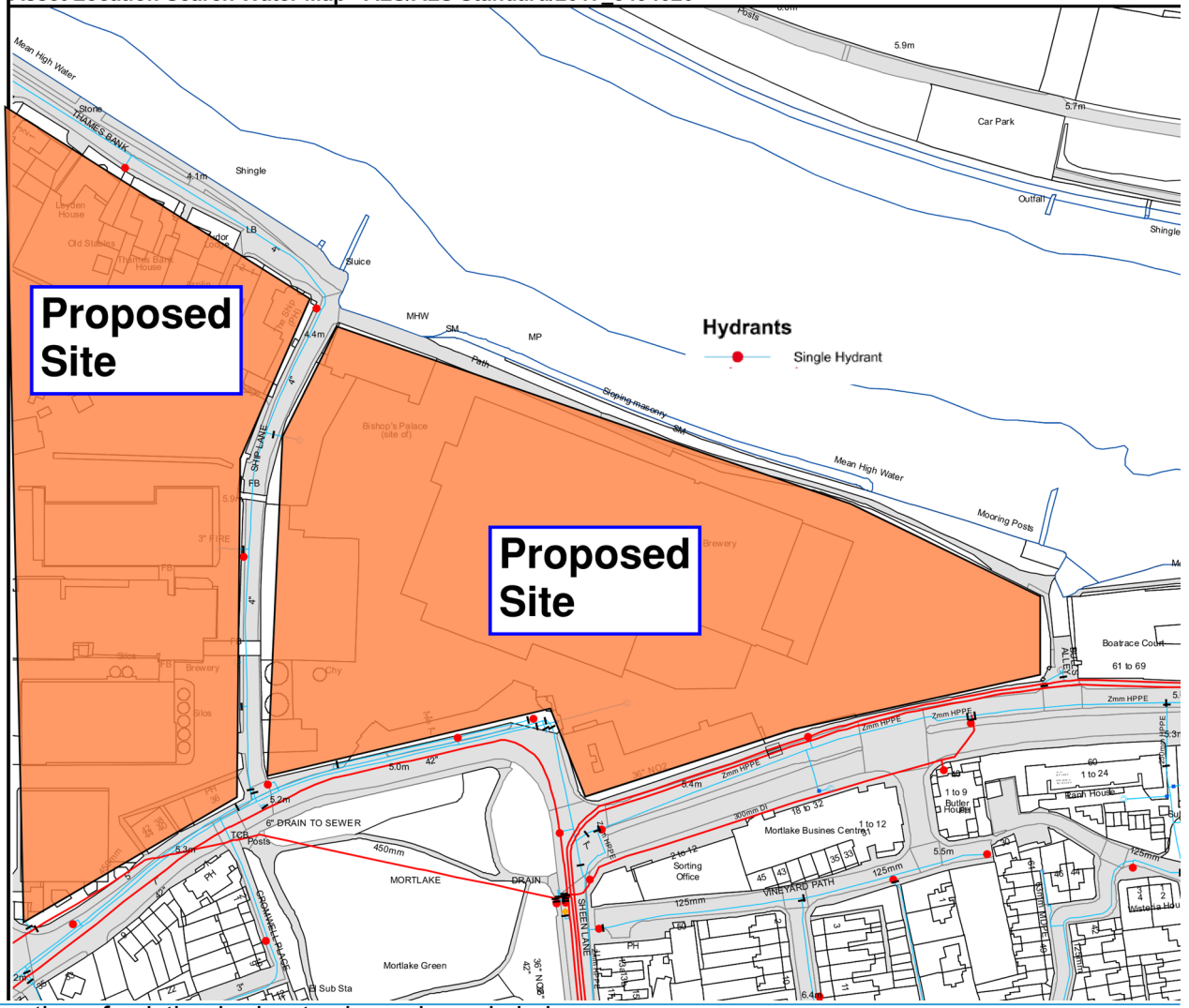
Fire appliance parking for single dwellings in block 20 anywhere in this area

Fire appliance parking for single dwellings in block 21 anywhere in this area





Asset Location Search Water Map - ALS/ALS Standard/2017 3494020



Location of existing hydrants shown by red circles

Fire statement completed by

<b>15. Signature</b>	 Miller Hannah BEng (Hons), CEng, MIFireE
<b>16. Date</b>	28/07/2022