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**FIRE SAFETY POLICY D12A PLANNING FIRE SAFETY STRATEGY  
3 BROUGHTON AVENUE, RICHMOND, TW10 7TT**

**Drawing reference:**

Proposed Ground Floor Plan Dwg No: 001-AR-5-03  
Proposed Roof Plan Plan Dwg No: 001-AR-5-09  
Proposed Elevations Dwg No: 001-AR-5-10

Dated: 03/04/2023  
Dated: 12/11/2023  
Dated: 12/11/2023

Dear Sirs,

The London Plan 2021, published 19 March 2021, is the Spatial Development Strategy for Greater London and sets out a framework for how London will develop over the next 20/25 years. Part of the London Plan aims to achieve the highest possible fire safety provisions for new buildings, partly in response to the Hackitt Review 2020. The intention of the Hackitt Review is to improve fire safety regulation and compliance which was initially focussed on high rise residential buildings (blocks of flats), but Fire Safety Policy D12A expands upon the original intent and captures all developments.

This project is a comparatively minor development which shall be following the national building regulation process which requires that the building work meets at least the minimum fire safety standards set out within the relevant guidance documents, namely 2019 edition of Approved Document B Volume 1 and/or BS9991:2015 Fire safety in the design, management, and use of residential buildings – Code of Practice.

This is not a major development as defined within Statutory Instrument 2015 No 595 Town and Country Planning and as such does not require a comprehensive Planning Fire Safety Strategy as required under Policy D12(B).

The Fire Safety D12(A) London Plan Guidance criteria sets out the matters required to be considered. The level of information required will vary with the size and scale of developments with an extension to an existing code compliant dwelling at the lower end of the PFSS expectations.

The matters set out below are a fixed criteria for the D12 process and seek to establish that fundamental fire safety provisions have been considered at design stage rather than requiring a change to the granted planning consent in order to address a fire safety requirement: -

### **Project Information**

Extension to the side of the property to create an integral ground floor shower room and laundry room accessed from outside of the building from the rear garden.

#### **1) Identify suitably positioned unobstructed outside space for:**

##### **a) Fire appliances to be positioned on -**

The access for the fire service remains as existing, which is very good with access via a public road, Broughton Avenue, to the front of the building (which is most likely to be the preferred location for one or more appliances). This provides adequate access for the fire service and meets the current guidance set out in B5. There would appear to be no detrimental impact upon other properties in terms of the fire service access.

##### **b) Appropriate for use as an evacuation assembly point –**

Acknowledging this is a private dwelling with limited numbers of occupiers, the front garden and pavement area is suitable as an assembly point with adequate space for all residents and guests and opportunity to walk further away from the building as may be necessary and will not place any residents in any danger and does not hinder fire service operations.

#### **2) This existing dwelling is designed to incorporate features which reduce the risk to life and the risk of serious injury in the event of fire, including appropriate alarm systems and active fire safety measures.**

The dwelling does not require an extensive automatic fire detection system. Automatic fire detection meeting the minimum requirements of ADB Volume 1 to be provided in accordance with BS5839-6:2019 and A1:2020, namely a 240-volt mains operated, interconnected smoke alarm with integral sounder in the staircase enclosure. No other active fire safety measures are required to ensure a safe dwelling.

The proposed alterations do not reduce or detrimentally impact on the existing fire safety measures already provided within the property.

**3) The dwelling is constructed in an appropriate way to minimise the risk of fire spread.**

The materials and boundary separation shall meet the requirements of ADB and the level of risk of spread of fire shall not exceed the national permitted criteria. The property is of traditional construction with masonry non combustibile external walls and a slate/tile roof. When the final design is submitted to the appointed Building Control Body, there shall be appropriate consideration of any fire resisting construction necessary to meet any appropriate boundary conditions.

**4) Provide suitable and convenient means of escape, and associated evacuation strategy for all building users.**

The existing means of escape provisions appropriate for this dwelling are not altered with the proposed works. The proposed shower room has access to the stair enclosure at the ground floor level from which egress is available to the outside of the building. The laundry room is only accessible from the outside of the building, with access to a large garden at the rear of the building. The evacuation strategy for the dwelling shall be a Simultaneous Evacuation which is risk appropriate.

**5) Develop a robust strategy for evacuation which can be periodically updated and published, and which all building users can have confidence in.**

This building is a private dwelling and periodic review is not appropriate as the Fire Safety Order does not apply.

**6) Provide suitable access and equipment for firefighting which is appropriate for the size and use of the development.**

The primary access for the fire service remains good using Broughton Road which is a reasonable width public highway. Access to the front of the building is straight forward with access provided direct to the inside of the building. Access for the fire service shall be addressed in accordance with B5. There is no requirement for any specific equipment for firefighting purposes.

Please do not hesitate to contact me if you have any further queries on the matter.

Yours Sincerely,

Russell Troth MIFireE

Managing Director

Institute of Fire Engineers membership number is: 00024948