

# L012 – FIRE STATEMENT

## Proposals:

Erection of a 2-bedroom flat with the provision of amenity space and parking at rear of property.

## Minor Development:

Paragraph A of Policy D12 ('Fire safety') of the London Plan 2021 states that "in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety and ensure that they":

*Topic 1: identify suitably positioned unobstructed outside space for fire appliances to be positioned on and appropriate for use as an evacuation assembly point*

*Topic 2: are designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire; including appropriate fire alarm systems and passive and active fire safety measures*

*Topic 3: are constructed in an appropriate way to minimise the risk of fire spread*

*Topic 4: provide suitable and convenient means of escape, and associated evacuation strategy for all building users*

*Topic 5: develop a robust strategy for evacuation which can be periodically updated and published, and which all building users can have confidence in*

*Topic 6: provide suitable access and equipment for firefighting which is appropriate for the size and use of the development.*

Paragraph B of Policy D12 – which requires the submission of Fire Statements prepared by a third-party independent, suitably-qualified fire assessor, only applies to 'major developments' (10 or more units) and is therefore not applicable to the proposed development, which is classified as 'minor development' pursuant to The Town and Country Planning (Development Management Procedure) (England) Order 2015.

Nonetheless, fire safety measures appropriate for and commensurate to the nature of the development must still be considered for minor development under Paragraph A.

Section 3 of the Draft London Planning Guidance on Fire Safety (February 2022)<sup>1</sup> confirms that minor developments are exempt from the requirement to submit a Fire Statement prepared by a suitably qualified fire safety professional, provided that the proposals do not include the provision of a lift. In the case of the proposed development, a lift is not planned or required.

Instead, the six topics outlined in paragraph A of Policy D12 of the London Plan 2021 can be evaluated using the template provided in the guidance or any other document containing equivalent information, commonly known as a 'Planning Fire Safety Strategy'.

Section 7 of the Draft Guidance confirms that a declaration of compliance signed by a suitably qualified fire safety professional is only required for major development; this corroborates the wording of the London Plan 2021. Appendix 1 of the Draft Guidance also confirms that a planning fire safety strategy or exception statement prepared for minor or householder development not containing a lift can be prepared by the applicant and their designers.

Accordingly, this planning fire safety strategy has been prepared by the applicant's design team to evaluate the fire safety implications of the proposed development against the topics outlined in paragraph A of Policy D12 of the London Plan.

### **Topic 1: Suitable space for fire appliances and evacuation assembly point:**

The private access road from Sixth Cross Road at rear leading to the development site is 3300mm wide at its smallest end. In addition, there is a second access through the main road Hampton Road out front. Both access points can accommodate a fire appliance and sufficient turning or minimum reverse distances.

Additionally, fire appliances could reach each of the dwellings along with the commercial unit within 45 metres by utilising both above access points. Both roads are regularly used by the public, making it accessible to fire appliances.

Overall, taking into account Government advice from the Manual for Streets, the modest scale of development (consisting of a small flat and retention of the commercial unit), and the additional fail-safe possibilities, the proposed development is deemed acceptable in principle. However, further details will need to be agreed post-permission, either through the planning system and/or the Building Regulations.

Suitable evacuation points are discussed under Topic 5 of this statement.

### **Topic 2: Reduce the risk to life or of serious injury in the event of a fire:**

The dwellinghouse and commercial unit will be fitted with an appropriate fire alarm system, installed in accordance with Approved Document B of the Building Regulations as well as guidance on fire safety provisions issued by the Chartered Institute of Environmental Health and The Chief Fire Officers Association<sup>2</sup>.

### **Topic 3: Construction to minimise the risk of fire spread:**

To ensure safety of building occupants all external materials proposed on the property would be class A fire rated, thus reducing the risk of fire spread throughout:

Brick wall and green roof are non-combustible and have a Class 0 spread of flame rating in accordance with Table A6 of TGD to Part B of the Building Regulations 1997 to 2017.

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Aluminium window and doors: aluminium, copper and stainless steel are all classified as A1 by the EU (source 1). Class A1 is defined as “no contribution to fire”.

Timber fence: all timber fences will include fire retardant wood to slow down the spread of fire.

Internally, the proposed dwellinghouses will meet the provisions of Approved Document B of the Building Regulations (e.g. fire resisting ceilings).

#### **Topic 4: Suitable and convenient means of escape:**

Every habitable room will benefit from FD30 doors and will lead directly to a protected stairwell/hallway (which in turn will lead to the final exit / building entrance). In instances where a less compartmentalized, open-plan layout is desired, adherence to Building Regulations Approved Part B ('Fire Safety') can be accomplished by implementing a fire suppression system (e.g. partial or full coverage sprinkler system) coupled with a fire engineer's report (to be assessed by the appointed Building Control Body at the time of completion or after the submission of a Building Regulations Application).

Upon exiting the building through the main entrance or secondary entrance, occupants will have access to a step-free route through the residential curtilage leading to the front public road, providing a pathway to a place of safety.

Other fire safety measures will be considered in accordance with guidance on fire safety issued by the Chartered Institute of Environmental Health and The Chief Fire Officers Association.

#### **Topic 5: Robust strategy for evacuation:**

The proposed development will consist of one 2-bedroom flat and the retention of one commercial unit.

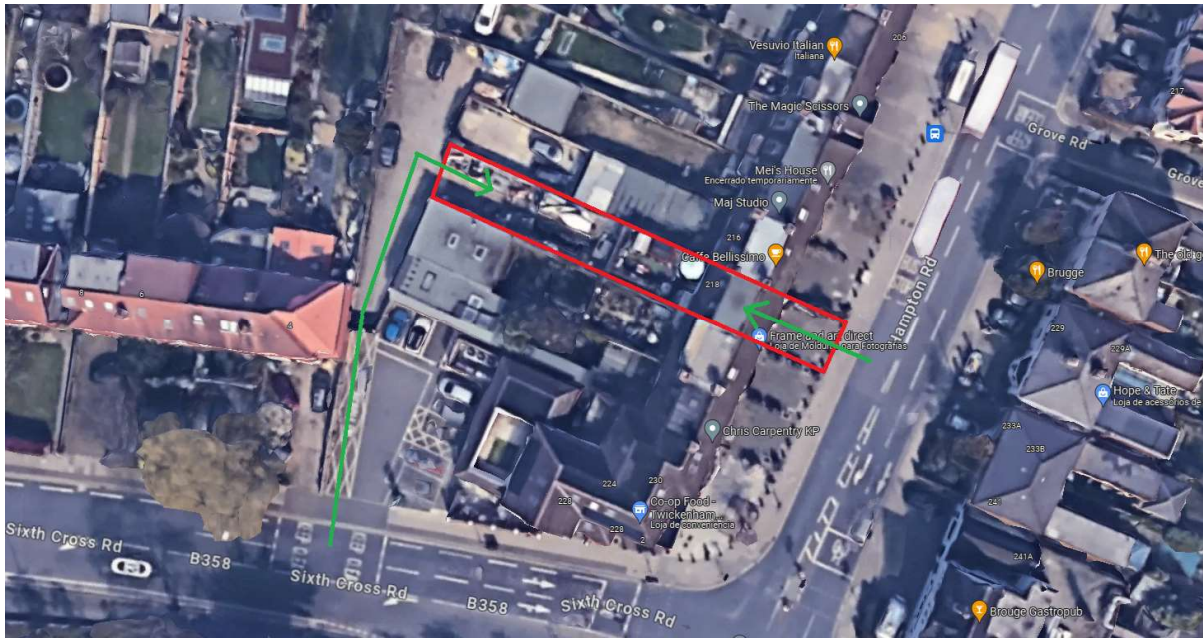
The shared internal circulation areas, have adequate escape route signage along with mains connected fire alarms that are interlinked with the residential and commercial units to ensure safe evacuation should a fire occur. Residents, upon hearing a fire alarm or noticing a fire, would evacuate the building and seek out the nearest and most obvious place of safety, being already familiar with the site.

#### **Topic 6: Suitable access and equipment for firefighting:**

Firefighters will be able to access the site on foot from front public path or the shared vehicular access at the rear of the property.

Suitable spaces for fire appliances are discussed under Topic 1 of this document.

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Firefighting access points