

FIRE SAFETY STRATEGY

TO SUPPORT PLANNING APPLICATION FOR CONSTRUCTION OF PART TWO STOREY AND PART SINGLE STOREY ATTACHED DWELLINGHOUSE; PROVISION OF REFUSE / RECYCLING STORAGE, AND AMENITY SPACE

AND

ASSOCIATED ALTERATIONS TO 15 TAYBEN AVENUE; (FOLLOWING DEMOLITION OF EXISTING WORKSHOP / STORAGE TO 15 TAYBEN AVENUE, GARAGE TO 13 TAYBEN AVENUE

AND

RE-POSITION OF BOUNDARY)

1. INTRODUCTION

This **Fire Safety Strategy** is submitted in support of the planning application, to the London Borough of Richmond Upon Thames Planning department (the “Council”), for the:

- Demolition of the existing garage to 13 Tayben Avenue,
- Demolition of the existing storage / home workshop to 15 Tayben Avenue,
- Removal and re-positioning of boundary between 13 and 15 Tayben Avenue,
- Erection of a two storey extension with rear single storey extension to the side of 13 Tayben Avenue to form a new self-contained dwelling (the “Proposed”), and
- Associated alterations to 15 Tayben Avenue; (the “Proposed Development”).

Where, in this Statement:

- Measurements are given, they are approximates and in metres.
- Extracts of plans, maps and or drawings are shown, they are not to scale.
- Photographs are shown, they are also not to scale and, unless otherwise stated, are as at 2023.
- Lettering and numbers are in:
 - ‘curved’ brackets, they are drawing numbers of architectural plans.
- Quotations are coloured in:
 - **Brown**, they are text from the quoted caselaw; and
 - **Blue**, they are text from the quoted planning legislation / policy / guidance.

The planning application for the Proposed Development (the “Planning Application”) is essentially an amended submission for the development proposed under planning application 22/3276/FUL (the “Original Planning Application”). The Original Planning Application was refused by the Council on 12.05.2023.

The matter was referred to appeal, under appeal reference APP/L5810/W/23/3332811 (the “Appeal”). The Appeal was assessed by Inspector C Livingstone MA (SocSci) (Hons) MSc MRTPI (the “Inspector”) on 23.07.24. The Inspector dismissed the Appeal on 23.07.2024 (the “Appeal Decision”) because “...*there is no suitable mechanism before me to secure an affordable housing contribution or restrict parking...*”; i.e. no completed Unilateral Undertaking, pursuant to section 106 of the of the Town and Country Planning Act 1990 (as amended) had been provided.

1. PLANNING POLICIES & GUIDANCE

The Applicant understands the following:

- Below legislation / national policy is the London Plan, which forms part of the ‘development plan’.

- The 'development plan' contains a set of policies and guidance for development of the borough and the Council's 'local plan' (adopted by the Council on 03.072018) (the "Local Plan") also forms part of this 'development plan'.
- The legislation provides that planning decisions must be taken in accordance with the 'development plan' unless there are material consideration that indicate otherwise.
- The Council's Local Plan is within the framework of material planning considerations.
- The Council's Supplementary Planning Documents ("SPD") provide greater detail on policies.
- The Council have prepared a new 'local plan'. This was made available for public consultation on 09.06.2023 and this ended on 24.07.24. The Applicant understands that, by submitting the Richmond Publication Version Local Plan (Regulation 19 version) (the "Draft Plan") for independent examination, the Council has formally confirmed its intention to adopt the Draft Plan and its supporting documents is now a 'material planning consideration'.

2.A. National / Development & Local Plan Policies

The main development plan policies are as follows:

- National Planning Policy Framework (NPPF)
- Planning Practice Guidance (PPG)
- Nationally Described Space Standards (2015)
- London Plan Guidance Fire Safety Policy D12(A) Pre-Consultation Draft, March 2021
- Building Regulations
- London Plan 2021
 - Policy D12
 - Policy SI 15 – Water Infrastructure
 - Policy GG 6 – Increasing Efficiency and Resilience
 - Chapter 6 – London's Transport
- Local Plan
 - Policy LP 1 Local Character and Design Quality
 - Policy LP 2 Building Heights
 - Policy LP 8 Amenity and Living Conditions
 - Policy LP 21 Flood Risk and Sustainable Drainage
 - Policy LP 22 Sustainable Design and Construction
 - Policy LP 34 New Housing
 - Policy LP 35 Housing Mix and Standards
 - Policy LP 36 Affordable Housing
 - Policy LP 37 Housing Needs of Different Groups
 - Policy LP 39 Infill, Backland and Backgarden Development
 - Policy LP 45 Parking standards and servicing

2.B. LBRUT's Supplementary Planning Documents / Guidance

The main SPDs are as follows:

- House Extensions and External Alterations SPD (2015) ("HEAEA SPD")
- Residential Development Standards SPD (2010) ("RDS SPD")
- Sustainability Construction Checklist SPD (2011) (SCC SPD")
- Design Quality SPD (2006) ("DQ SPD")
- Planning Obligations SPD (2014) ("PO SPD")
- Affordable Housing SPD (2014) ("AH SPD")
- Refuse and Recycling Storage Requirements SPD (2015) ("RARSR SPD")
- Front and Other Off-Street Parking Standards (2006) ("FAOOSPS SPD")

SITE LOCATION

The Site

The site is located on the north side of Tayben Avenue, at the end of the cul-de-sac, which is solely residential. The site is not within a Conservation Area.

The site is in close proximity of Twickenham Stadium and located approximately 0.7 miles north of Twickenham railway station.

13 Tayben Avenue

The existing is a two storey private self contained 3 bedroom detached residential dwelling with attached garage and detached garden shed. The existing is currently being refurbished and an application for a certificate of lawfulness has been submitted to the Council for a loft conversion including side dormers and other alterations.

15 Tayben Avenue

The existing is a three storey self contained private 3 bedroom detached residential dwelling with attached storage / home workshop.

FIRE SAFETY STRATEGY

This Fire Safety Strategy has been prepared in accordance with the requirements of Policy D12 (Fire Safety) of the London Plan 2021 and is as follows:

Response to 'Guidance on policy Criteria for London Plan Policy D12(A)'

This Fire Safety Strategy is written in accordance with Fire Safety Policy D12(A) Pre-consultation draft, March 2021.

Unobstructed outside space for fire appliances to be positioned on

Sufficient unobstructed space is available outside the front of the two dwellings on Tayben Avenue, at the end of the cul-de-sac, where the emergency services can park, turn and exit.

Additional unobstructed space is available on the pedestrian footpath to the A316.

Areas for use as an evacuation assembly point

The front driveway and footpath to the front of two properties or the space on the pedestrian footpath to the A316 can be utilised as an evacuation assembly point.

Appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire

The proposal will incorporate measures to reduce the risk to life and serious injury in the event of a fire including the inclusion of smoke alarms.

The building works will comply with appropriate building regulation standards.

Design measures that minimise the risk of fire spread

The proposal will be designed to adhere to the current version of the Building Regulations Part: B for fire safety.

This will incorporate safe measures for fire detection, means of warning occupants, means of escape and means of control of a fire.

Conclusion

The proposed development was evaluated against London Plan 2021 Policy D12(A) and complies with paragraphs 3.12.3 and 3.12.4.

It is therefore considered that the proposal should be supported.

21ST AUGUST 2024