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53A Warminster Road
South Norwood
London SE25 4DQ

Planning Fire Safety Strategy

APEX STRATEGIES

Control Sheet

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The works are to be carried out to the approval and satisfaction of the Building Control Officer, to accepted good building practice and with full compliance and in accordance with all relevant British Standards and Codes of Practice.

The Contractor must comply with relevant building control instructions and Directives.

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Appendix A: Approved Site Layouts and Elevations

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1. Introduction

This Planning Fire Safety Strategy (PFSS) has been prepared by Apex Strategies Ltd on behalf of Londonist International Management Limited in relation to approved development proposals at 53A Warminster Road, South Norwood, London, SE25 4DQ which comprise the erection of a two storey side addition providing two flats with associated site alterations.

This PFSS has been prepared to discharge Condition 11 of the site's approval under Croydon Council's planning reference 24/02402/FUL, and to address London Plan (2021) Policy D12(a) 'Fire Safety', which states;

"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:

1. *identify suitably positioned unobstructed outside space:*
    a. *for fire appliances to be positioned on*
    b. *appropriate for use as an evacuation assembly point*
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*
3. *are constructed in an appropriate way to minimise the risk of fire spread*
4. *provide suitable and convenient means of escape, and associated evacuation strategy for all building users*
5. *develop a robust strategy for evacuation which can be periodically updated and published, and which all building users can have confidence in*
6. *provide suitable access and equipment for firefighting which is appropriate for the size and use of the development."*

London Plan paragraph 3.12.2 notes that;

"The matter of fire safety compliance is covered by Part B of the Building Regulations. However, to ensure that development proposals achieve the highest standards of fire safety, reducing risk to life, minimising the risk of fire spread, and providing suitable and convenient means of escape which all building users can have confidence in, applicants should consider issues of fire safety before building control application stage, taking into account the diversity of and likely behaviour of the population as a whole."

London Plan Policy D12(A) Fire Safety guidance states that;

"Where the applicant considers parts of or the whole policy do not apply, this should be justified in a Reasonable Exception Statement (RES)."

The aim of this document is therefore to demonstrate the relevant fire safety aspects of the proposed development design to date and provide commentary on where the policy does and does not apply.

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This document does not constitute the detailed fire strategy under the Building Regulations which will be developed as the scheme progresses.

This PFSS is presented in a format which responds to the listed criteria of London Plan Policy D12(A).

The development provides residential accommodation, as such, the proposals have been considered against the requirements set out within The Building Regulations (2010) Approved Document B: Volume 1 - 2019 edition incorporating 2020 and 2022 amendments; hereafter referred to as **'ADB1'**.

This Strategy has been informed by the approved layouts and elevations included at **Appendix A**.

This Planning Fire Safety Strategy has been prepared by Brett Littlewood, who is qualified with a HND in Construction and the Built Environment (Civil Engineering), a higher level apprenticeship in Construction Management, has 12+ years experience as a consulting Highways Engineer and is a Member of the Institute of Highways Engineers (MIHE). The author's qualifications and experience are considered to be commensurate with the size, scope and complexity of the development.

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2. Planning Fire Safety Strategy

Criteria 1a - Identify suitably positioned unobstructed outside space for fire appliances to be positioned on

ADB1 [13.1] states that: *For flats, either of the following provisions should be made.*

a. Provide access for a pumping appliance to within 45m of all points inside each flat of a block, measured along the route of the hose. Every elevation to which vehicle access is provided should have a suitable door(s), not less than 750mm wide, giving access to the interior of the building. Door(s) should be provided such that there is no more than 60m between each door and/or the end of that elevation (e.g. a 150m elevation would need at least two doors).

b. Provide fire mains in accordance with paragraphs 13.5 and 13.6.

London Fire Brigade Guidance Note 29 (GN29) 'Access for Fire Appliances' recommends that the minimum width of road between kerbs to provide access for a pumping appliance should be 3.7m, and that access roads for pumping appliances should be provided with 6m working area(s) at appropriate locations where appliances are to be positioned and used around the building.

Warminster Road, onto which the site has direct frontage, has a relatively constant carriageway width of around 8.4m which is more than adequate to provide access to the development. The distance between the carriageway and the furthest part of the building (measured along the route of the hose) is in the order of 35m, which is within the recommended limit of 45m. On this basis it is considered that **suitable unobstructed space for the stationing of a fire appliance is available therefore Criteria 1a is satisfied.**

Criteria 1b - Identify suitably positioned unobstructed outside space appropriate for use as an evacuation assembly point

It is not necessary to formally designate an evacuation assembly point for individual flats / dwellinghouses.

Nevertheless, in principle, assembly points should be located sufficiently far from the premises to minimise interference with the fire and rescue service or danger from falling debris, but should be accessible and not so far away as to discourage people from assembling.

It is considered that in the event of a fire, evacuation assembly could be accommodated within the footway along Warminster Road at an appropriate distance from the building, and in a location which minimises interference with the fire and rescue service. Depending on the scale / location of the fire, it may also be suitable to accommodate evacuation assembly within the large forecourt area to the front of the building. The number of occupants assembling will be minimal therefore the space required for assembly is negligible.

Suitable unobstructed space for evacuation is available from the development thereby satisfying Criteria 1b.

Criteria 2 - 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

Fire Detection and Alarm:

An automatic detection and alarm system in a building provides an effective means to identify a fire scenario in the early stages of fire growth and to notify building occupants automatically of the fire scenario with a clear message or sound.

All dwellings should have a fire detection and alarm system in accordance with the relevant recommendations of BS 5839-6. *(ADB1 - 1.1)* For the proposed flats, the following system requirements are recommended:

- **LD2 (Additional Protection):** A system incorporating detectors in all circulation areas that form part of the escape routes from the premises, and in all specified rooms or areas that present a high fire risk to occupants, including a heat alarm in any kitchen and a smoke alarm in principle habitable room(s).
- **Grade D1:** A system of one or more mains powered detectors, each with a tamper proof standby supply consisting of a battery or batteries.

This setup provides a reliable and comprehensive level of protection, ensuring early detection in critical areas and helping to safeguard the occupants.

Passive fire safety:

Passive fire safety measures are built-in structural and design features that aim to contain fires and slow their spread without human intervention or mechanical systems. These measures include fire-resistant walls, floors, and doors, which compartmentalise buildings to prevent the spread of fire and smoke between different areas. See **'Criteria 3 - Internal Fire Spread'** for further details.

Active fire safety:

No active fire safety systems, such as sprinklers are required.

Criteria 2 Summary:

Fire detection and alarm systems designed, installed & commissioned in accordance with BS 5839-6 shall be provided within each flat.

All construction shall achieve adequate fire resistance and compartmentation in accordance with the requirements of ADB Tables B3, B4 and C1. See **'Criteria 3 - Internal Fire Spread'** for further details.

Criteria 2 is thereby satisfied.

Criteria 3 - Constructed in an appropriate way to minimise the risk of fire spread

Criteria 3 Design Comments:

Internal Fire Spread:

Compartmentation is the process of dividing a structure into 'compartments' for effective risk management. The main objective of compartmentation is to contain a fire within a specific section of a building, limiting the passage of flames and smoke. This then allows more time for occupants to safely evacuate a building and for fire services to extinguish the flames.

For the development, the required compartment walls are those which separate the proposed flats from the existing building, the entrance / stair enclosure serving the first floor flat (Apartment 2), and the ceiling which separates the proposed ground floor flat from the first floor flat. All compartments will be provided with 60 mins fire resistance.

External Fire Spread:

To resist the **spread of fire over external walls**, the external surfaces should comply with the provisions in ADB Table 10.1. In residential buildings below 11m in height (applicable to the proposed development), external surfaces and finishings should achieve a reaction to fire performance of Class B-s3, d2 or better, when sited within 1000mm of relevant boundaries. Where greater than 1000mm from relevant boundaries, no specific provisions are required.

The proposed elevations with external surfaces are to be of brick construction which is fire proof and would not contribute to the risk of fire spread over external walls.

To resist the **spread of fire from one building to another**, consideration should be given to the fire resistance of the wall, its proximity to the relevant boundary, and the extent of any unprotected areas.

"Unprotected areas" refer to specific parts of a building's external walls that have reduced or undetermined fire resistance. These areas typically include openings such as windows, doors, or other types of openings, especially those that are not designed or glazed to provide the necessary level of fire resistance. Unprotected areas also encompass any parts of the external wall which offer less fire resistance than is required by the relevant regulations or are constructed of materials that do not meet the required fire resistance standards.

The concept of unprotected areas is essential in the context of preventing the spread of fire between properties. The regulations dictate that the extent of unprotected areas in a building's external wall is contingent upon the distance of the wall from the boundary of the property.

External walls on, and within 1000mm of, the relevant boundary must limit individual unprotected areas to no greater than 1m² with additional requirements on spacing between unprotected areas as set out in ADB1 Diagram 11.5.

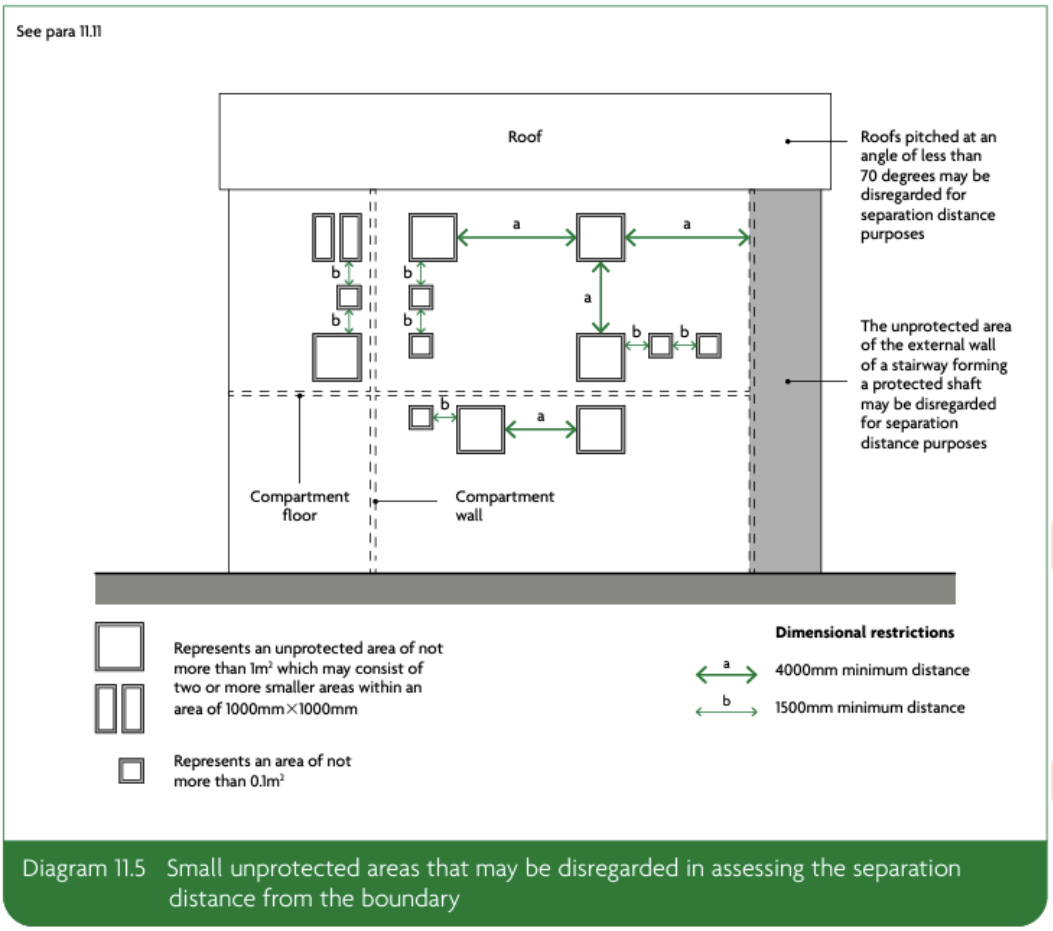


Diagram 11.5 Small unprotected areas that may be disregarded in assessing the separation distance from the boundary

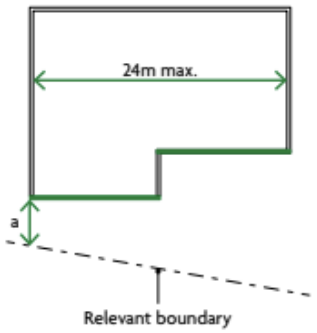
No unprotected areas are proposed to the elevations within 1000mm (i.e. the party walls to adjoining buildings). The minimum distance to a relevant boundary is in the order of 1.3m (south-east corner of proposed extension); this increases to around 2.2m at the south-western corner.

External walls 1000mm or more from the relevant boundary, should limit unprotected areas in accordance with either the methods set out in ADB, or, where more precise calculations are required, the methods set out in BRE report BR187 (2nd Edition) 'External fire spread - Building separation and boundary distances'.

The side (south) elevation features 2 Nº doors only, each with an area of 2.3m² (4.6m² total unprotected area). However, given the doors shall be separated by compartment walls, the amount of unprotected area for assessment purposes is 2.3m². This falls below the recommended maximum of 5.6m² for boundary distances above 1m but less than 2m. See ADB1 Diagram 11.7 overleaf.

The distance between the front (west) and rear (east) elevations and their respective relevant boundaries exceeds 6m, as such there are no limits on unprotected areas.

See para 11.18



Minimum distance (a) between side of building and relevant boundary (m)	Maximum total area of unprotected areas (m^2)
1	5.6
2	12
3	18
4	24
5	30
6	No limit

Diagram 11.7 Permitted unprotected areas in small residential buildings

Based on the above, the development is considered acceptable in terms of unprotected areas and risks of external fire spread. Therefore, Criteria 3 is satisfied.

Criteria 4 - Provide suitable and convenient means of escape, and associated evacuation strategy for all building users

Means of Escape:

From the ground floor, ADB1 states that:

All habitable rooms (excluding kitchens) should have either of the following.

A. An opening directly onto a hall leading to a final exit.
B. An emergency escape window or door

The proposed layout features an entrance hall which leads into the shared kitchen / dining / living room. A single bedroom is also proposed and this is accessed via the kitchen / dining / living room. As the bedroom does not have direct access to the entrance hall, means of escape shall be achieved by ensuring the bedroom window is a suitable escape window. Alternative means of escape from the kitchen / dining / living room are also possible via the patio door into the rear garden area.

For escape from upper storeys a maximum of 4.5m above ground level, ADB1 states:

All habitable rooms (excluding kitchens) should have either of the following.

A. An emergency escape window or external door, as described in paragraph 3.6.
B. In multi-storey flats, direct access to a protected internal stairway (minimum REI 30) leading to an exit from the flat.

The first floor flat features a final exit / entrance at ground floor level which serves a protected stair leading up to first floor level. The protected stair directly serves both the single bedroom and the shared kitchen / dining / living room. This meets the requirements of ADB1 as described above in point (b).

Both flats feature en-suite bathrooms that are accessed via the bedroom. En-suites are permitted 'inner rooms' under ADB1 paragraph 3.7.

Based on the above, the means of escape from all areas of the development are acceptable and satisfy the requirements of ADB1.

Evacuation Strategy

In all premises, the guiding principle for evacuation should be 'keep it simple', which should ensure that all persons likely to be in the building will correctly follow the chosen procedure. The simplest suitable option for a flat / dwellinghouse is single stage evacuation; I.e. in the event of a fire, all occupants should immediately evacuate to a place of safety.

For a small development of two flats, each with independent means of escape, it is considered that the development of a detailed evacuation strategy is unwarranted.

Criteria 4 Design Comments:

Satisfactory means of escape are provided from all areas of the development in accordance with the relevant requirements set out in ADB, and details of the simple evacuation strategy have also been provided.

Criteria 4 is thereby satisfied.

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

Evacuation Strategy

As discussed under Criteria 4, the development of a robust evacuation strategy for individual residential flats is not warranted.

Criteria 5 is not applicable to the proposed development.

Criteria 6 - Provide suitable access and equipment for firefighting which is appropriate for the size and use of the development

Access and Facilities

As noted under **Criteria 1a**, a fire service vehicle is able to station itself along Warminster Road within 45m of all parts of the proposed development. Furthermore, the doors providing access to the interior of each flat are over 750mm wide. It is therefore considered that suitable access is available for the fire and rescue service.

For information purposes, the nearest Fire Station is Woodside Fire Station located approximately ~1.4 mile (7 minutes drive) to the south of the site as illustrated below.



The nearest known fire hydrant to the site is located within the footway along Warminster Road, at the junction with Avenue Road, at a distance of ~65m to the north of the site.

Adequate access and facilities to support fire fighting operations are proposed and therefore Criteria 6 is satisfied.

Appendices

Appendix A: Approved Site Layouts and Elevations

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