

**Freedom of Information request reference number:** 7606.1

**Date of response:** 11/07/2023

**Request:**

Since September 2021, how many meetings have taken place between the London Fire Brigade and RUSS, ROOFF, Lewisham Council and/or others regarding the fire safety of the RUSS building project at Church Grove SE13? Please include in-person meetings, phone calls, Zoom meetings etc, and provide dates, names of those attending, meeting notes and any outcomes."

'RUSS and ROOFF will make sure to provide the LFB with all the detailed design information request on the renewed attention to the 12 Church Grove project.' Please confirm that the LFB was thus provided with this information and provide any subsequent related correspondence, e.g. from LFB to RUSS or ROOFF, accordingly."

**Response:**

Further to your request, I have requested information held by LFB on Church Grove, SE13. There is a record of a meeting taking place on the 22<sup>nd</sup> September 2021. Please see below for a record of the Agenda including some briefing notes. We do not hold a central audit history, so do not hold information of further meetings taking place.

I can also confirm that LFB have received details of the design plan, which was received on 22 March 2021. We have no record of any updated design plans after this date. A response was provided by LFB on the 8<sup>th</sup> August 2021. Please see below for a redacted copy of the correspondence. Personal information has been removed from the agenda and report under [section 40 of the FOIA – Personal Information](#).

We have dealt with your request under the Freedom of Information Act 2000. For more information about this process please see the guidance we publish about making a request on our website: <https://www.london-fire.gov.uk/about-us/transparency/request-information-from-us/>

**From:** [REDACTED]

**Sent:** 13 September 2021 16:23

**To:** [REDACTED]  
[REDACTED]

**Cc:** [REDACTED]  
[REDACTED]

**Subject:** Re: Approval for wording of agenda for LFB/Church Grove meeting 22 September.

Hello again,

Here is a tweaked version of the agenda. Thanks for your input earlier today – I hope this works better.

[REDACTED], do let me know if you're happy with item 3 on the agenda – I thought it would be very brief, a way of concluding the meeting by looking to the future and a chance for you to mention (repeating the info given at last week's meetings) how very regulated construction traffic will be, with the booked delivery slots and banksmen. But I'm also happy to pull it if you'd rather be an observer at the meeting – it's fine either way.

[REDACTED]

[REDACTED]

[REDACTED]  
[REDACTED]

### **1) A draft agenda so that we can add our items as necessary prior to finalising**

#### **Agenda**

*Purpose of meeting with LFB on 22 September: to respond to queries about access for fire appliances from Ladywell Road to 12 Church Grove. We hope that a team from Lewisham Fire Station will be in attendance with a fire appliance but this will depend upon their availability on the day.*

1. Introductions (All)
2. Demonstration and discussion of fire appliance access to Church Grove and turning circle on 12 Church Grove site (LFB)
3. Outline of steps to be taken to ensure emergency access is maintained during construction (ROOFF)

#### **Notes**

1. The dimensions of Church Grove (kerb to kerb and parking bay to kerb) can be found in the attached document *Fire Appliance Access Technical Note*, p.4.
2. Questions relating to the design of the building (e.g. materials, method of construction, provision of sprinklers) are beyond the scope of this meeting and are covered by the Building Control process.

[REDACTED]  
[REDACTED]

All households 1-20 Church Grove have been invited, along with [REDACTED] and [REDACTED]. The attending officer from LFB is an [Inspecting Officer](#) [REDACTED] with the contact email [REDACTED].

**3) What you have sent the LFB by way of briefing**

The draft agenda and the *Fire Appliance Access Technical Note*.

**4) That the meeting will be a round-table event (e.g. in the hub), not just a huddle at the work site**

The meeting will take place on the 12 Church Grove site. The hub will be available if needed.

[REDACTED]  
[REDACTED]

The meeting is scheduled for up to 60 minutes. Notes will be taken by RUSS and shared with attendees, Lewisham Strategic Development Team and any Church Grove residents unable to attend.

**6) That a representative from [REDACTED] and Council Planning will attend**

[REDACTED] is not available on the date that was most convenient for the LFB. Notes will be shared with [REDACTED]. Representatives from Lewisham Planning have not been invited, following the indication of [REDACTED] who advised by email on 3 August:

I do not consider that the Planning Service can help you further with the matters you raise and I also encourage you to liaise with the Approved Inspector who is responsible for addressing matters of fire safety going forward.

Lewisham Council Strategic Development Team have been kept informed of this meeting and of all correspondence on this matter.

[ENDS]



Fire Safety Regulation,  
169 Union Street London SE1 0LL  
T 020 8555 1200

Minicom: [REDACTED]  
london-fire.gov.uk

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

The London Fire Commissioner is the  
fire and rescue authority for London

Date 6<sup>th</sup> April 2021  
Our Ref 90/008512  
Your Ref 145836

FAO: [REDACTED].

Dear [REDACTED].

**RECORD OF CONSULTATION/ADVICE GIVEN.**

**REGULATION 12 – BUILDING (APPROVED INSPECTORS ETC.) REGULATIONS 2010.**

**SCOPE OF WORKS: ERECTION OF 2 FOUR STOREY LINKED RESIDENTIAL BUILDINGS TO  
CREATE 36 DWELLINGS WITH ASSOCIATED ANCILLARY ACCOMMODATION.**

**SITE: LAND AT CHURCH GROVE, LADYWELL, LONDON, SE13 7UU**

Thank you for your consultation dated 22<sup>nd</sup> March 2021.

The Brigade has been consulted with regard to the above-mentioned premises and makes the following observations:

Thank you for your documentation relating to your building consultation. Plans indicate that a fire engineering solution is in place or being proposed and consultation with the Brigade's Fire Engineering Group will delay the return of our comments for up to 12 weeks.

Any queries regarding this letter should be addressed to **Inspecting Officer, [REDACTED]** If you are dissatisfied in any way with the response given, please ask to speak to the Team Leader quoting our reference.

Yours Faithfully,

[REDACTED]

Assistant Commissioner (Fire Safety Regulation)

Reply to [REDACTED] Direct T [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

The London Fire Commissioner is the  
fire and rescue authority for London

Date 8<sup>th</sup> August 2021  
Our Ref 90/008512  
Your Ref 145836

FAO: [REDACTED].

Dear [REDACTED].

**RECORD OF CONSULTATION/ADVICE GIVEN.**

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**PLAN NUMBERS: 0001 P01; 0002 P01; 0004 P01; 1701 P02; 1703 P02; 1705 P02; 1707  
P02; 1102 P03; 1104 P03; 1106 P03; 1108 P03; 1110 P03; 1702 P02; 1704 P02; 1706 P02;  
1708 P02; 1101 P03; 1103 P03; 1105 P03; 1107 P3; 1109 P03; 1203 P01; 1204 P01; 1201  
P01 and 1202 P01. NOTE: MOST OF THE ELECTRONICALLY SUBMITTED PLANS INCLUDED  
ANNOTATIONS.**

**OTHER DOCUMENTS REVIEWED: FIRE BRIGADE CONSULTATION PRO-FORMA – RUSS;  
BUILDING REGULATIONS – RUSS FIRE STRATEGY COMMENTS and 201224 RUSS SEH FIRE  
STRATEGY REPORT DRAFT C.**

We note the proposed installation of a premises information box, I attach guidance note 70.

The London Fire Commissioner (the Commissioner) is the fire and rescue authority for London. The  
Commissioner is responsible for enforcing the Regulatory Reform (Fire Safety) Order 2005 (The Order)  
in London.

The Commissioner has been consulted with regard to the above-mentioned premises and makes the  
following observations:

**The Commissioner is not satisfied with the proposals, for the following reasons:**

**(1) Comments on proposed scheme primarily relating to the Regulatory Reform (Fire Safety)  
Order 2005**

- 1) General comment. The consultation pro-forma provided states that this is an 'initial in-principle  
submission and a further consultation will be made when the full detailed design has been



- completed'. However we understand construction is due to commence on site? If further changes to the design are proposed then we recommend further consultation at the earliest opportunity.
- 2) General comment. The consultation pro-forma provided details the building height to be 10.5m measured in accordance with ADB Diagram D6. Further clarification on this point is requested as the building sits on a deck which, according to the strategy document, potentially increases this height.
  - 3) General comment. We note that BYL have already made comment regarding the means of escape balcony design. We assume that these areas are being treated as means of escape routes not only in their management but also in their construction.
  - 4) General comment/request for clarification. Are there voids between the balcony levels? If there are then how are these considered in terms of the potential for smoke spread between levels particularly where these are located adjacent to the flat entrance/exit doors on each level as these should be imperforate to the below levels.
  - 5) General comment. It is noted that BYL have queried the ventilation provision to the staircase. We would ask for clarification on this point particularly where the staircase is enclosed or for example, where there may be an expectation that the open balcony affords a certain amount of protection.
  - 6) General comment. The fire strategy is difficult to follow in places and may benefit from a restructure with the main content of the document focussing on what is being provided and some of the background reference, while of relevance, being placed in an appendix. This would make review of the strategy and understanding of its contents for the responsible person easier in our opinion.
  - 7) Fire strategy section 4.0. While the building height is below 11m, the building itself sits on top of a deck. The drawings and fire strategy do not clearly show the topography of the site and aspects such as fire service vehicle access points and the association with the upper floors of the building. The drawings provided are not very easy to interpret and do not include the car park level with 'ground floor' drawings in reality being a level potentially above ground making the assessment of the proposals difficult. Further clarification and detail is therefore requested on this point and without this further detailed review of this submission has not been undertaken at this point.
  - 8) Fire strategy section 1.0 – it is noted that reference is made to a communal laundry/guest room and office/shared workspace. The location of the guest room is not evident on the drawings provided and it is unclear how this space is being managed as part of the fire strategy in terms of evacuation strategy.
  - 9) Fire strategy (page 16) shows an image where indicative table/chairs layouts are shown. As the strategy highlights, these areas should be strictly controlled as means of escape routes and managed as such.
  - 10) Fire strategy section 12.4 – The management strategy for the evacuation lift that is proposed for this development is for the responsible person to determine. It is not acceptable, in our view, for a lift to be installed and management of the evacuation to be expected to be carried out by the fire service.
  - 11) Fire strategy section 12.4 – we would concur that escape via windows etc. is not an appropriate strategy for this building due to the height of the windows above ground (as this structure sits on top of a deck and it is not clear where the windows are in relation to 'true' ground level) and the amount of accessible/adaptable flats proposed for this scheme.

## **(2) Comments on proposed scheme primarily relating to the Building Regulations**

- 12) General comment – we assume that the design of the duplex accommodation has been considered as it is unclear if this was captured within the fire strategy document. We assume a protected staircase approach has been adopted but this was not detailed within the strategy document as far as we could ascertain.
- 13) Fire strategy section 15 – we assume that the building control body has reviewed the proposed system and is satisfied it complies with the building regulations.
- 14) Fire strategy section 23. Based on the comment above regarding building height, further information is required about the vehicle access point and the height differential between that and the highest occupied floor such that an assessment can be made as to whether firefighting shafts are required for this building. The access for FRS is also intrinsically linked with other aspects of the design such as external firefighting and rescue capabilities which would then impact aspects such as, for example, the external wall design.
- 15) Fire strategy section 23. The detail regarding the dry rising mains provision is confusing. The drawing provided would have benefitted from showing the vehicle parking position and the distance between the fire appliance and the dry riser inlet location. It is also not clear, from the

diagram in this section, if the inlet points are visible from the parking position but it is noted that the text states that they will be within 18m. We request a further diagram/clarification be provided that explains the text with regards to the excessive horizontal runs as it is not clear what is being referred to here. Comparison to a hospital is not considered appropriate in this instance as that (managed) occupancy group is completely different to a stay put scenario where occupants could be solely reliant on fire and rescue service for rescue. Reference to local fire station location(s) is also not considered relevant as a call could be responded to by stations further afield if the local stations are already in attendance elsewhere.

- 16) Fire strategy section 23. Wayfinding information for fire crews will be needed for this development (as detailed within Approved Document B). Signage will need to be clear and unambiguous and routes intuitive for attending crews.
- 17) Fire strategy Appendix A – is blank in our version of the document supplied however we assume that the building control body has reviewed the content of this appendix as it relates to kitchen location and are satisfied with the detail. For these type of assessment we recommend that due consideration is given to the position of the kitchen (and in particular cooking appliances) and the final exit from the flat to ensure that any cumulative radiative effect has been considered.

### **(3) Additional observations and recommendations relating to proposed scheme**

#### **Regulation 38 (Building Regulations)**

Where applicable, we presume that the building control body will check to ensure that adequate fire safety information (as detailed in Section 17 of Approved Document B, Volume 1) will be issued to the responsible person for the premises at the completion of the project, or when the building or extension is first occupied.

#### **Photovoltaic cells**

We note that a significant number of photovoltaic cells are to be installed; care should be taken to ensure that these are installed correctly to the manufacturer's recommendations due to concerns that have recently come to light in regards to the fire risks associated with poorly fitted installations. We recommend that 'arc-fault' protection is fitted if possible, and also request that it is clarified whether there is any access (e.g. for maintenance) to the areas where the cells are situated.

### **(4) Expected outcome of consultation**

Based on the nature of the items raised above in sections (1) to (3):

- We would expect to be consulted further to this letter due to the significant issues raised in relation to matters under the Regulatory Reform (Fire Safety) Order 2005 and/ or B5 fire service access arrangements. In our view further information should be provided in regards to the following:

Section 1, section 2 comments 14 and 15.

Notwithstanding the above, we presume that all comments raised in this consultation letter will be forwarded to the client/ project design team for consideration.

The above observations are in relation to the current proposal and may not be relevant to any future proposal.

Any queries regarding this letter should be addressed to **Inspecting Officer** [REDACTED]. If you are dissatisfied in any way with the response given, please ask to speak to the Team Leader quoting our reference.

Yours faithfully,



Assistant Commissioner (Fire Safety Regulation)

Reply to [REDACTED]

Direct T [REDACTED]

**The London Fire Brigade promotes the installation of sprinkler suppression systems, as there is clear evidence that they are effective in suppressing and extinguishing fires; they can help reduce the numbers of deaths and injuries from fire, and the risk to firefighters.**