



LONDON FIRE BRIGADE

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Freedom of Information request reference number: 9121.2

Date of response: 05/12/2024

Request:

London Fire Brigade Planning Recommendations I understand from the audit that LFB produced recommendations to the Planning Officers during the planning process. Further, I understand that these recommendations were not followed as outlined in the conclusion which reads: *"Only one fire fighting shaft is in place with 2 additional protected stairwells. Although not ideal, the concerns and recommendations from our fire engineering team were ignored at planning"*

Firstly constituent would be grateful if you could provide sight of the relevant correspondence or report which outlines the concerns and recommendations which were ignored during the planning process. If this is required to be processed as an FOI I would be grateful if this actioned in this way.

If this report is not available, I would be grateful if you could outline specifically what works or decisions were taken which contradicted LFB's recommendations during the planning process.

In addition, if the information is available I would be grateful if you could outline if the relevant Planning Officer sought the guidance or input of LFB during the planning process and had sight of these recommendations?

Finally, our constituent has asked: "If the LFS recommendations at that time [of the planning process] were stricter or would negate the pp [planning process], why is their current FSA less stringent now".

I would be grateful if your offices could clarify if any material differences between the recommendations which are likely to be outlined by the Fire Engineering team during the planning process and the recommendations raised during a Fire Safety Audit. My constituent would be grateful if you could clarify why recommendations which appear to have been made regarding fire fighter access during the planning process were not formally added as recommendations as a part of the Fire Safety Audit?

Response:

In response to the above, the LFB retain very little in the way of building consultation documents and or plans. If the LFB was consulted, then we may hold a record of the consultation response letter. This will either confirm that the Brigade is satisfied/not satisfied with the proposals.

Our Fire Safety regulatory team have confirmed we do hold a consultation response letter which provided our advice, the letter dated 15th October 2020 which I have attached below. Personal data has been removed from the attached documents under [section 40 of the FOIA –Personal Information](#).

The Fire safety inspection officer has also confirmed the reference to planning was meant to reflect the overall level of response at the early stages when dealing with the LFB.

The Audit report dated 13th May 2024 confirmed no significant failure to comply with the Regulatory Reform (Fire Safety) Order 2005 (RRO) and as a result the premises were deemed broadly compliant.

We can make our recommendations in the notice of consultation response however once the building consultation is approved and we are not satisfied we can issue the alteration notice. I have previously provided you with a link to the alteration notice in FOIA9121.1 [Public notices](#)

The planning application can be found on Camden councils website here

<https://planningrecords.camden.gov.uk/NECSWS/PlanningExplorer/Generic/StdDetails.aspx?PT=Planning%20Applications%20On-Line&TYPE=PL/PlanningPK.xml&PARAM0=615039&XSLT=/NECSWS/PlanningExplorer/SiteFiles/Skins/camden/xslt/PL/PLDetails.xslt&FT=Planning%20Application%20Details&PUBLIC=Y&XMLSIDE=/NECSWS/PlanningExplorer/SiteFiles/Skins/camden/Menu/PL.xml&DAURI=PLANNING>

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/>

[REDACTED]
M25 Business Centre
121 Brooker Road
Waltham Abbey
EN9 1JH

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

Date 15 October 2020
Our Ref File: 02/211920 [REDACTED]
Your Ref RBC/18/493

Dear [REDACTED]

RECORD OF CONSULTATION/ADVICE GIVEN

REGULATORY REFORM (FIRE SAFETY) ORDER 2005 ARTICLE 46 THE BUILDING (APPROVED INSPECTORS ETC.) REGULATIONS 2010

SCOPE OF WORKS: CONVERSION OF EXISTING CAR PARK TO HOTEL
PREMISES: 112A GREAT RUSSELL STREET, LONDON. WC1B 3NP
PLAN NUMBER(S): RBC/FDS RESPONSE DATED 2ND JULY 2020
REGIONAL BUILDING CONTROL CONSULTATION LETTER
RBC/18/493
FDS CONCEPT FIRE STRATEGY REPORT – ISSUE 07 DATED 1/7/20
OTHER DOCUMENTS: GRS-9101 REV C4, GRS-9102 REV C4, GRS-9103 REV C4
GRS-9104 REV C4 & GRS-9105 NO REV PROVIDED

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. We note your commentary however our position has not changed; we fundamentally disagree with the design approach, in particular:

- During and post fire ventilation strategy.
- Extended travel distances in hotel corridors and back of house areas within unventilated corridors.
- Interconnecting stairs with different purpose groups.
- Provision of a single firefighting shaft with a floor plate greater than 900m²
- The use of Approved Document B which may not be appropriate for this design.

We recommend a meeting between ourselves, the BCB and the design team to discuss.

RBC/FDS RESPONSE DATED 2ND JULY 2020

Item 1-2

2. We note your comments however we disagree with your approach. As previously stated we do not believe ADB is appropriate for this scheme, in our opinion a conversion of a basement car park in to a hotel does not constitute as a common building situation where ADB can be used.

We note FDS consider that due to the age of the building 'other guidance documents may not be feasible'. As noted within our previous letter we would highlight that a fire engineered approach using BS 7974 may be the most appropriate.

Item 3

3. The plans indicate that this may also be an escape route from the 'BOH areas' if so then no combustible storage should be located along the route in order to comply with Article 14 of Regulatory Reform (Fire Safety) Order 2005.

Item 4

4. Noted. Item considered closed.

Item 5

5. We are aware of the additional commentary within BS 5839-1 and we would reiterate that due to its unusual design that for a basement hotel conversion of a car park that is sharing stairs with other occupancies, L1 alarm coverage should be deemed as the minimum requirement for the premises. Thus we do not believe it should used to justify extended travel distances.

Item 6

6. We note the updated commentary within 3.4.12 within the fire strategy, we assume this method will still ensure that the firefighting stair is adequately protected from any ingress of smoke.

Item 7

7. Noted, however no elevation of the staircase and the AOV has been provided as per FDS comment.

Item 8

8. Noted. However we would like to highlight we have yet to be provided any CFD for this scheme.

Item 9

9. We note your commentary however we are still of the opinion that the sharing of staircases between different purpose groups is not appropriate.

Item 10

10. It appears that our comments may have not been clear. As the firefighting lobby is designated as a disabled refuge, this area will be a location disabled persons are expected to wait until they are able to be assisted in their evacuation. If several disabled occupants are present, this may cause a

significant delay, thus there could be a point where the MSVS has activated whilst they are waiting in this area.

We note that there is a secondary disabled refuge point available to the Responsible Person, that can be utilised however again if several occupants are having to use this stair, this may place unrealistic management constraints by the way of training and additional equipment upon the Responsible Person and are unclear as to how this meets the commentary of 0.6 of Approved Document B Vol 2.

Item 11

11. See our comment 9.

Item 12

12. As noted above we fundamentally disagree with the sharing of staircases between different purpose groups. Additionally we note that no evidence has been provided or guaranteed by freeholder that they plan to limit the occupancy numbers to the current tenants.

Without this evidence we fail to see how the fire strategy can be correct in relation to occupancy limits and stair capacities, which is a critical aspect due to the sharing of stairs via several occupancies and purpose groups.

Item 13

13. From our experience of operational incidents, evacuation is still likely to be ongoing whilst initial fire crews will have arrived on scene. Additionally FDS notes that the firefighting lift lobby should be clear. It should be confirmed whether the responsible person plans to use lift evacuation in relation to any disabled evacuation plans. If so all of the above information should be clearly communicated within the fire strategy and Regulation 38 package of information.

Items 14 - 15

14. See our comment 10.

Item 16

15. As the floor plate is over 900m² and this is a material change of use, then a secondary fire-fighting shaft should be provided.

Item 17 - 18

16. We are aware that both ADB and BS 9999 do not require smoke ventilation of common corridors within hotels, however as previously stated we do not believe that ADB or BS 9999 is appropriate guidance for this proposed scheme. Notwithstanding would require basement ventilation.

Our reference to the Smoke Control Association (SCA) guidance was in reference to firefighter penetration (tenability) limits not the ventilation of the corridors and not the ventilation solution to the corridors.

We continue to have fundamental concerns around ventilation via the corridors which in our opinion is inappropriate. This aspect of the scheme should be reviewed to ensure that adequate ventilation is provided from all areas of the basement.

Item 19

17. We note your commentary however disagree with the provision of a dual opening firefighting lift. If it is to be provided what resilience measures will be in place to satisfy Article 38 of the Regulatory Reform (Fire Safety) Order 2005, if the fire curtain is out of service or fails to descend during an incident?

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

18. See comments 13-17.

(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/Section 19 of Approved Document B, Volume 2) 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.

(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:

All items above.

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 [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 020 8555 1200 [REDACTED]