

Planning Fire Statement Strategy

1A Throwley Way, Sutton, SM1 4AF

Continued use of the premises as a place of worship (Use Class F1)

PFSS 1.1 - November 2023

Prepared by Mr W Pierson
BA (Hons) PG Dip, MRTPI

PD Planning UK

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1. Introduction

- 1.1. This Planning Fire Safety Strategy (PFSS) is submitted in conjunction with a planning application for the continued use of the premises as a place of worship. No external works are proposed to the building and internal works are limited to general repair and refurbishment.
- 1.2. The PFSS is written in a manner appropriate to the scale and nature of the development. It is intended that the fire safety information provided at this planning application stage will continually be reviewed so that an overall fire strategy can be maintained for the life-cycle of the building, in accordance with the preferred "golden thread" principles. It is a "live" document that will evolve as necessary to address issues or concerns that may arise during the planning process or subsequent use of the building.

2. The Site and its Location

- 2.1. The application site is located on the western side of Throwley Way, to the rear of Times Square shopping mall within Sutton Town Centre.



*Figure 1 - Aerial photograph of the site
(Google Maps)*

- 2.2. Photographs of the site and its surroundings are provided within the accompanying photographic sheet. The building that occupies the site is a 2 and 3 storey building with rendered elevations to the front parts, and brick elevations to the rear. Behind the rendered

front facade there is a mansard type roof, terminating half-way along the building, where there is then a flat roof to the 2 lower floors. To the front of the building there is a single storey “vestibule” extension with predominantly glazed elevations and a monopitch tiled roof.

- 2.3. The building was formally occupied as a Snooker Hall, but more recently has been used as a place of worship under Use Class F1(f).



Figure 2 - Front and northern elevations and fire exits

- 2.4. The building has three levels, accessed from a staircase and lift at the front of the building, through the glazed vestibule.
- 2.5. The lower ground floor extends across the whole of the site and was used by the snooker hall as a playing area, offices, plant and storage space. As a place of worship this floor has been used as the main auditorium, with ancillary book store and auditory control room.
- 2.6. The upper ground floor also extends across the whole of the building and was used by the snooker hall as a playing area to the rear with a bar and lounge area to the front. The use of the premises as a place of worship has retained the bar and lounge area as a serving counter, and the remainder of the floor has been used for informal meetings and activities outside of the main auditorium, and also for storage.
- 2.7. The staircase and lift leads up to the top floor contained within the mansard type roofspace to the front half of the building. This provided a playing area for the snooker hall with ancillary offices. As a place of worship, this floor has been used as meeting rooms, the pastor’s office and caretaker’s accommodation. The mansard roof form is to the front half of the building, with a rear exit door allowing access onto the flat roof above the rear 2 storey parts of the building.

- 2.8. The building occupies the whole of the site, except for a narrow surfaced forecourt to the front of the vestibule extension. Emergency egress is afforded from the lower ground floor level of the building into the rear of the Times Square Shopping Centre, and at first floor level from the rear of the building, across the flat roof, and down an external metal stair to the adjoining ramped service access to the shopping centre.
- 2.9. The rear of the building abuts the rear of the Times Square Shopping Centre, and the northern elevation abuts the service ramp to the Centre. The southern elevation abuts the locally listed building (LL94) "Sutton Arcade", comprising 2 no. two-storey, flat roofed buildings that support a central archway through to a parking area at the rear. The buildings are in use as a tattoo studio and as a minicab office.



Figure 3 - Sutton Arcade adjacent to the application property

- 2.10. Opposite the application site are 7 pairs of semi-detached, two-storey houses, arranged close to the highway with small front gardens. The wider area is dominated by several tower block consistent with the Sutton Town Centre location. This includes "Aspects" a 15 storey residential block at No.1 Throwley Way, and Times House, a 7 storey office block at the rear of the Times Square shopping centre.
- 2.11. Throwley Way is a one-way road in a north-south direction. The pavement to the front of the property is partly used as a cycle path, and the highway also accommodates a bus lane. Double yellow lines prevent any parking within the bus lane, and a single yellow line on the opposite side of the road prevents parking at most times. Times Square Car Park is opposite and to the north of the application site. The car park is operational between 7am and 8.30pm Monday to Saturday, and between 9.30am and 6.00pm Sundays and Bank Holidays.



Figure 4 - Throwley Way looking northwards from the application site

- 2.12. The property is not within a Conservation Area and it is not a listed building. There are no statutorily listed buildings within the vicinity of the site, and the adjoining locally listed Sutton Arcade will not be affected by the continued use of the premises.

3. The Proposal

- 3.1. The application seeks planning permission to continue the use the premises as a Place of Worship (Use Class F1). The Applicant, Faith Church Ministries Ltd, are purchasing the property and will occupy the premises replacing the former occupants, Gilbert Deya Ministries.
- 3.2. Faith Church Ministries is a Pentecostal, Tamil church established in 1993, currently with 10 churches across the UK. The premises in Sutton will complement the existing churches in London located at Surbiton, Wembley and East Ham.
- 3.3. As the property has been in use as a church for many years, no external changes to the building are required and only minor refurbishment and decoration is required to the internal parts.
- 3.4. The building will be used in the same way as the former church occupiers. The lower ground floor hall will accommodate the main space for religious purposes, the upper ground floor hall will provide a meeting and recreation space, including a refreshment counter, and WC facilities. The upper floor will continue to be used as offices and meeting spaces associated with the church use and activities. The existing upper floor flat is not intended to be used by the Church, although it will remain in situ, ancillary to the church use.
- 3.5. The proposed activities and the maximum number of attendees expected on the premises at different times of the day are indicated in below:

Proposed Activities

	Morning (09.00 - 13.00)	Afternoon (13.00 - 18.00)	Evening (18.00 - 22.00)
Monday	Prayer Groups, Community Meetings, Training, Youth Groups		
Tuesday	Prayer Groups, Community Meetings, Training, Youth Groups		
Wednesday	Prayer Groups, Community Meetings, Training, Youth Groups		Evening Worship
Thursday	Prayer Groups, Community Meetings, Training, Youth Groups		
Friday	Prayer Groups, Community Meetings, Training, Youth Groups		Night Worship (until midnight, once a month)
Saturday	Fasting Prayer		

Sunday	Sunday Worship
	The use of the building for group meetings will be dependent on demand - it will not be all day, every day.

Maximum number of individuals on the premises at any one time

	Morning (09.00 - 13.00)	Mid Afternoon (13.00 -18.00)	Evening (18.00 +)
Monday	25	35	60
Tuesday	40	40	30
Wednesday	25	45	70
Thursday	40	25	40
Friday	35	50	200
Saturday	150	40	300
Sunday	300	300	60

Figure 5 - Proposed activities and potential maximum number of attendees.

- 3.6. The use will generate some employment opportunities with regard to the maintenance and operation of the building, for the Pastor and persons involved in the administrative tasks of the church, and for the cleaning and maintenance of the building. Volunteer roles and employment opportunities will also be formed through the various community groups that it is hoped will use the building.

4. Legislative Background and Policy

- 4.1. Statutory Instrument 2021 No.746 and Article 9A to the Town and Country Planning (Development Management Procedure and Section 62A Applications) (England) Order require the provision of a Fire Statement to address the fire safety design principles, concepts and standards that have been applied to any “relevant” development. A relevant development is defined as a residential or educational building that is more than 18m in height or more than 7 storeys. The building is a three-storey building less than 18m in height and it is therefore not a “relevant” development that requires the provision of a Fire Statement in the context of this statutory legislation.

- 4.2. The Local Planning Authority's requirement for a Planning Fire Statement Strategy arises from the 2021 London Plan Policy D12 on Fire Safety. LP Policy D12 comprises two parts, A and B:

 Policy D12 A

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.*

 Policy D12 B

All major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor.

The statement should detail how the development proposal will function in terms of:

- 1) the building's construction: methods, products and materials used, including manufacturers' details*
- 2) the means of escape for all building users: suitably designed stair cores, escape for building users who are disabled or require level access, and associated evacuation strategy approach*
- 3) features which reduce the risk to life: fire alarm systems, passive and active fire safety measures and associated management and maintenance plans*
- 4) access for fire service personnel and equipment: how this will be achieved in an evacuation situation, water supplies, provision and positioning of equipment, firefighting lifts, stairs and lobbies, any fire suppression and smoke ventilation systems proposed, and the ongoing maintenance and monitoring of these*
- 5) how provision will be made within the curtilage of the site to enable fire appliances to gain access to the building*
- 6) ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures.*

- 4.3. Part A relates to all developments, and Part B relates to “Major” development proposals ¹.
- 4.4. As this development is not defined as a Major development, only Part A falls to be considered. Part A is supported by a Pre-Consultation Draft (March 2021) London Plan Guidance document entitled “Fire Safety Policy D12(A)”, and in February 2022 consultation draft “Fire Safety” London Plan Guidance (LPG). To demonstrate the highest standards of fire safety, the Guidance requires applicants to submit a Planning Fire Safety Strategy (PFSS) commensurate with the size, scope and complexity of the development.
- 4.5. Further to the requirements at planning stage, the owner of the building and the Church will be aware of their requirements under the Regulatory Reform (Fire Safety) Order 2015 and the Fire Safety (England) Regulations 2022. The Order requires the “responsible person” ² to carry out a Fire Risk Assessment and make an Emergency Plan:

 <https://www.london-fire.gov.uk/safety/the-workplace/fire-risk-assessments-your-responsibilities/>

 <https://www.london-fire.gov.uk/safety/the-workplace/your-emergency-plan/>

5. The Planning Fire Safety Strategy

- 5.1. London Plan Policy D12 and the associated London Plan Guidance document set out a number of criteria to demonstrate that development can meet the highest standards of fire safety proportionate to the development. The following information is therefore provided in response to the suggested criteria.

1) Fire appliances access and evacuation assembly points

- 5.2. Any fire and rescue service pumping appliances that may need to attend the site can access it from Throwley Way from the front entrance or through the fire exits within the side of the building.

¹ As defined in the Glossary to the London Plan, Major development comprises 10 or more dwellings or the creation of more than 1000 sq. metres of floorspace.

² A responsible person is the person who has control of the premises (as occupier or otherwise) and/or the owner of the premises.



Figure 6 - Throwley Way for fire appliances and evacuation assembly points

- 5.3. There are fire and water hydrants located within nearby buildings and the surrounding road network that can serve the application property when an emergency water supply is required.



Figure 7 - A fire hydrant is evident in Throwley Way just to the south of the property

- 5.4. The evacuation assembly point will be on the highway/pavement in Throwley Way to the front of the building. A Fire Exit door from the lower floor provides (alarmed) emergency access into Times Square shopping centre and the adjacent fire exit from the centre alongside the building. Fire Exit doors from the upper floors provide emergency access onto the flat roofs of the building and fire escape stairs to the adjoining car park.

2) Reducing the risk to life and injury in the event of a fire

- 5.5. The continued use of the premises a place of worship does not require any major changes to the existing building. The previous use as a church and the former snooker hall will have adopted appropriate fire safety features and preventative fire safety measures and the new occupants will involve similar numbers of people and similar activities.
- 5.6. Any refurbishment of the building will nevertheless incorporate passive and active fire safety measures.
- 5.7. Passive measures are the elementary parts of a building or structure that do not require a reaction or human intervention during a fire, such as fire-resistant compartment walls, fire

doors and fire-resistant glazing. Passive fire protection is achieved through compartmentalisation, sub-dividing a building into compartments to prevent the spread of fire, together with the use of fire-resistance rated walls and floors, fire doors and fire-resistant glazing. Dampers can also prevent the spread of smoke through any ductwork.

5.8. The applicant will incorporate appropriate passive fire safety measures for any internal works in accordance with the requirements of the Building Regulations.

5.9. Active fire protection systems require a reaction or action to mitigate the effects of a fire. Automatic systems are usually in the form of fire alarms, smoke detectors, sprinkler systems and ventilation systems, although manual intervention such as fire extinguishers and fire blankets can also be used.



5.10. The proposed use will also incorporate appropriate active fire safety measures in accordance with the Building Regulations.

5.11. Fitted smoke and fire alarms will conform to British Standard EN 14604:2005, and heat alarms will conform to British Standard 5446-2:2003.



5.12. These measures will ensure the highest standards of fire safety are met.

3) Minimising the risk of fire spread

5.13. At this planning stage the construction materials for any internal changes to the building have yet to be procured, and the detailed fire safety information of the construction materials is not therefore available. When procurement of materials is undertaken, consideration will be given to the fire safety properties of the materials, and their sustainability credentials, to ensure the use of appropriate materials.

5.14. Only materials that are Class A2-s1 rated and above under the European classification system, as set out in the standard BS EN 13501-1 and as reflected in UK Building Regulations will be used (except for the exempt elements as set out under Regulation 7(3) of Approved Document B).

4) Means of escape

5.15. The continued use will not preclude the existing means of escape from the building. An adequate means of escape will be retained through existing doors and windows, and the existing fire exit doors and staircases will be retained in good working order, and remain open and unblocked.



Figure 8 - Existing fire escape doors and staircase to be maintained

- 5.16. The lift within the building is already fitted to maintain fire safety and it will be maintained as such for so long as the church use is in existence.

5) Evacuation Strategy

- 5.17. It will be necessary, among other things, for the owner/occupier of the building to carry out and maintain a Fire Safety Risk Assessment. The building's management team will also ensure that the building's fire safety provisions are appropriately managed, maintained and tested over the whole life of the building, to include an Evacuation Strategy in case of a fire event.
- 5.18. It is envisaged that the building will have a simultaneous evacuation strategy, whereby on activation of a detector anywhere in the building, all occupants will evacuate.
- 5.19. Given the limited size of the building, all evacuation travel distances will be less than the maximum distances permitted. Escape and other fire safety signage will be provided in accordance with the recommendations of BS 5499: Part 1 to ensure efficient evacuation.

6) Fire Safety Equipment

- 5.20. There is an adequate firefighting water supply in the vicinity, from nearby properties or fire hydrants.
- 5.21. The Applicant will acquire and maintain appropriate fire safety equipment. This may include fire and carbon monoxide alarms, fire extinguishers and fire blankets relevant to the use of the rooms in which they are situated. Escape and other fire safety signage will be provided to assist with the use of the equipment.

6. Conclusion

- 6.1. This PFSS is commensurate with the scale and nature of the development and appropriate to the planning application for the continued use of the building as a place of worship. The use and the number of attendees are little different from the previous occupants and it will accommodate all necessary fire safety measures in accordance with London Plan Policy D12. There will be no adverse impact on fire safety.