

UNIT 1 THERAPIA LANE

D12 & D5 PLANNING FIRE SAFETY STRATEGY

Project Address:

Unit 1, Therapia Lane, Croydon, CR0 4TD

Prepared on Behalf of:

Willmott Dixon Construction Ltd

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1 Introduction

1.1 Project Summary

Osborn Associates Limited (OAL) has been appointed by Willmott Dixon Construction Ltd to prepare a Fire Statement in accordance with the London Plan Policy D12 for the proposed regeneration of the existing vehicle maintenance centre at Unit 1, Therapia Lane, Croydon, CR0 4TD.

1.2 Aims and Objectives

This document intends to form a Planning Fire Safety Strategy, as necessary to comply with the conditions outlined in The London Plan Policy D12 Fire Safety in the first instance (see Section 2.2). This document also intends to satisfy The London Plan Policy D5(B5) Inclusive Design, as appropriate and relevant to the provision of evacuation lifts.

1.3 Authors

Oliver Brooke BEng (Fire) AIFireE, Bachelor of Fire Engineering and Associate Member of the Institution of Fire Engineers, has over six years of industry experience. He has delivered safe, code-compliant solutions in high-risk and critical environments, with an extensive background in healthcare and laboratory environments. Oliver has managed fire-related projects from conception through to handover and into their use and has a thorough understanding of the challenges that can be presented when working with existing buildings.

Subiraj Doraisingam BEng (Mech) MIFireE CEng, Bachelor of Mechanical Engineering and Member of the Institution of Fire Engineers, as well as Chartered Engineer with the Engineering Council UK and Member of the Institute of Mechanical Engineers (IMechE). Subiraj joined OAL in 2012. Before that, he led teams on complex fire engineering projects from concept to delivery, including project management and testing. As a director, he manages Osborn Associates' Fire Engineers with extensive experience in various fire engineering designs. Projects include educational establishments, residential buildings, commercial offices, hotels, and manufacturing projects.

2 The London Plan 2021

2.1 Overview

In March 2021 the Greater London Authority published a Spatial Development Strategy (also known as 'The London Plan'), documenting the overall strategic plan and societal framework for the development of London over the next 20 to 25 years.

The London Plan outlines several design policies which are intended to form the basis against which planning applications are assessed. The policies which are directly relevant to fire safety in buildings are Policy D12 Fire Safety and Policy D5(B5) Inclusive Design.

The statement has been developed using the prescriptive recommendations of *Approved Document B Volume 2: Buildings other than dwellings, 2019 edition incorporating 2020 and 2022 amendments* (ADB Vol. 2) to satisfy the requirements for fire life safety under Part B of Schedule 2 to The Building Regulations 2010 (as amended), namely:

- B1 - Means of Warning and Escape.
- B2 - Internal Fire Spread (Linings).
- B3 - Internal Fire Spread (Structure).
- B4 - External Fire Spread.
- B5 - Access and Facilities for the Fire and Rescue Service.
- Regulation 7 - Materials and Workmanship.

2.2 Policy D12 Fire Safety

Policy D12 of The London Plan states:

- 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.*
- b) *All non-major (minor) development proposals should be submitted with a Planning Fire Safety Strategy, 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.*

Generally, major developments are as outlined below, with non-major (minor) developments being anything under these thresholds:

- 7) *Developments of dwellings where 10 or more dwellings are to be provided, or the site area is 0.5 hectares or more.*
- 8) *Development of other uses, where the floor space is 1000 m² or more, or the site area is 1 hectare or more.*

2.3 Policy D5(B5) Inclusive Design

Policy D5(B5) of The London Plan states:

- b) *Development proposals should achieve the highest standards of accessible and inclusive design. They should:*
- 5) *Be designed to incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum, at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.*

2.4 Context of This Document

The site area is noted as being ~0.85 ha, and whilst the floorspace is measured at ~1580 m², London Borough of Sutton Planning have confirmed that where the works are limited to a refurbishment of an existing building, the works are to be regarded as a 'minor development' under the terms of Policy D12(A). Therefore, this document forms the Planning Fire Safety Strategy as required by Policy D12 to supplement the wider project planning submission and intends to outline how each aspect of the policy can or will be achieved for this development.

This Planning Fire Safety Strategy will also determine the applicability of Policy D5(B5) to this development and provide commentary, as appropriate. Where practicable, this Planning Fire Safety Strategy will follow the recommendations of the (draft) supplementary guidance published in relation to Policy D12.

3 Building Description

3.1 Building Description

Unit 1, Therapia Lane is an existing portal frame industrial building, located on the Therapia Lane industrial estate, Croydon CR0 4TD. The site comprises of an open-air parking area of ~0.85 ha, and the existing single storey industrial building which contains a mezzanine level less than 50% of the overall floorplate.

It is proposed to overhaul the current building and surrounding area to provide a modern maintenance and parking facility for London Borough of Sutton Council's (LBoS) waste management fleet, and the associated offices and welfare facilities required to the run the service.

LBoS Planning have stated they consider the project as a Minor Development, where it is limited to the refurbishment of an existing structure with no material change of use.

The proposed works will see the hard standing areas re-surfaced, and infrastructure provided for electric vehicle charging. The security provisions of the site will be validated, and re-instated, if necessary, where the building has sat empty for a number of years. A new vehicle access point into the site is proposed from Coomber Way.

Within the existing industrial building, existing roof panels and wall cladding systems are to be replaced for compliant modern alternatives. It is currently proposed that the existing structural slab and portal frame be retained, subject to the outcome of intrusive surveys which will confirm their condition and continued functionality. A complete internal fit-out will be undertaken which is to provide office and vehicle maintenance facilities.

As works progress into RIBA stage 3 and beyond, detailed design will be formulated to ensure adherence to the Building Regulations.

The location of the building is shown in Figure 1 below, highlighted in red with the site boundary in green, and a street view of the building's exterior showing the current façade is shown in Figure 2.



Figure 1 - Location of the building (Google Earth, 2023)



Figure 2 - Existing building exterior

3.2 Use and Occupancy

The building is a purpose-built industrial unit, located within an industrial estate. The fire safety design is driven by the use of the area, being a premises for the maintenance, repair, and cleaning of vehicles. The processes included within this function can introduce frequent hot works, flammable liquids, and electric vehicle charging, and therefore, the fire safety design is to limit all such risks to as low as reasonably practicable.

The occupancy of the site will be controlled and limited to staff and approved contractors only, there will be no general public access. Given the use of the building, a simultaneous evacuation procedure is proposed, whereby the entire building is evacuated immediately on receiving an evacuation signal or instruction.

The building is predominately for vehicle maintenance however, where ancillary offices are provided in which the compartment will have an area more than 280 m² and the area is to be more than one-fifth of the total floor area of the building, separate purpose groups, in line with ADB Vol. 2 Table 0.1, are proposed for the respective areas as shown in Table 1 below.

Table 1 - Purpose Groups:

| Area | Purpose Group |
|---------------------|---------------|
| Office | 3 |
| Vehicle maintenance | 6 |

4 Key Fire Safety Strategy Considerations

4.1 The Building's Construction Method and Materials Used

The existing building structure is a steel portal frame system, featuring concrete protection up to the underside of the ring beam. Surveys of the structure have been undertaken to verify that the existing provisions are in accordance with ADB Vol. 2 section 13.16 note.

The building currently features a mezzanine floor which covers less than 50% of the aggregate floor area. It has been observed that the internal structure is formed of two systems, one of which serves the office areas and the other, a raised storage space. The office areas have been seen to have timber joists spanning between the steel beams, with timber decking. Whereas the mezzanine storage area is infilled

with steel purlins spanning between the steel beams with a timber decking. As part of the re-design, this internal structure is to be removed and replaced with a new system to achieve best compliance.

The existing façade system will be removed, replaced with a modern equivalent which meets the criteria of ADB Vol. 2 and the London Plan requirements. Where the development is considered minor, there is no requirement for the external wall systems to achieve a minimum of A2-s1,d0. Further information of the façade systems is outlined in section 4.7.

The lower-level perimeter of the building is constructed with blockwork, from which the existing cladding system appears suspended. This is considered to skirt the building and should provide the necessary external wall protection to the adjacent escape routes, as outlined in section 4.8.2.

4.2 Evacuation Strategy

The evacuation strategy employed in the building will be simultaneous evacuation, where the entire building is evacuated immediately upon receiving an evacuation signal or instruction.

The fire alarm and detection system will signal the evacuation of the building on the activation of a single smoke detector, heat detector or manual call point. No acknowledgement or investigation period is currently proposed.

4.3 Means of Escape

4.3.1 Travel Distance

The travel distances within the building should be limited to those noted in Table 2 below. These distances are based on the purpose groups assigned within Table 1 below.

Table 2 - Travel Distance Limits:

| Location | Maximum Travel Distance where Travel is Possible In: | |
|------------------------------------|--|-----------------------------|
| | One Direction Only [m] | More than One Direction [m] |
| Office | 18 | 45 |
| Industrial (normal hazard) | 25 | 45 |
| Industrial (higher hazard) | 12 | 25 |
| Special fire hazard ^[1] | 9 | 18 |

Note ^[1] - Place of special fire hazard is room such as any of the following: oil-filled transformer room, switch gear room, boiler room, storage space for fuel or other highly flammable substance(s), houses a fixed internal combustion engine.

The quantities of hazardous goods and materials to be contained within the workshop area is to be reviewed at later design stages to determine whether a normal or higher hazard classification is most suitable.

4.3.2 Horizontal Escape

With the building occupancy limited to 150 persons, a minimum of two escape routes are to be provided to ensure adequate means of escape. Escape routes will be critiqued against the travel distances highlighted within Table 2 above, with additional escape routes provided where necessary.

The full requirements for horizontal escape will be determined at a later design stage when layout plans have been confirmed.

4.3.3 Vertical Escape

Where the building implements a simultaneous evacuation strategy and includes one storey above ground level, via the mezzanine, Table 3.2 of ADB Vol. 2 is the most appropriate reference for determining the widths of stairs.

Where the client has noted building occupancy should be limited to 150 persons, the stair widths should be at least 1,000 mm. Internal layouts will be finalised during the next design stages and will meet the relevant criteria for means of escape.

4.4 Evacuation of Mobility Impaired Occupants

Refuges will be provided within lobbies or protected stairs on the mezzanine level. Each refuge should be a minimum of 900 mm x 1400 mm in size and accessible by someone in a wheelchair. It should not reduce the width of the escape route or obstruct the flow of people escaping. These refuges will enable them to wait in a place of safety while most people descend before they make their way out of the buildings at their own pace with assistance.

Refuges should be provided with an emergency voice communication (EVC) system complying with BS 5839-9. It should consist of Type B outstations communicating with a master station in the building control room (if one exists) or next to the fire detection and alarm panel. In some buildings, wireless technology may be more appropriate.

A Generic Emergency Evacuation Plan (GEEP) should be developed for building occupants who would require assistance to escape. Further information can be found in BS 8300 and the DCLG Publication “Fire Safety Risk Assessment Supplementary Guide - Means of Escape for Disabled People”.

Individual PEEPs will be developed for disabled people who are regularly in the premises (such as staff and regular visitors) or for visitors to the premises who have made themselves known to staff.

The provision of evacuation lift is discussed in more detail in Section 4.6.

4.5 Assembly Points

The building perimeter is surrounded by a footpath which affords access from any final exit to the hardstanding outside the front of the building.

An exact area of this hardstanding should be made available as an assembly point during both the construction and occupation phases of the development. This is to be confirmed at later design stage and subjected to the outcome of a Fire Risk Assessment.

4.6 Policy D5(B5) - Provision of Evacuation Lifts

According to London Plan Policy D5, an evacuation lift should be provided in addition to Building Regulations requirements for firefighting shafts / lifts, to ensure they can be used for evacuation purposes when the firefighting lift is in use by Fire and Rescue Service.

The provision of evacuation lifts may be utilised to propose alternative vertical evacuation methods to mitigate the risks involved with any failure of the typical vertical evacuation strategy. Since the building is under 18 m height, a dedicated fire-fighting lift is not required.

At present, a platform lift is proposed to provide access between the ground floor and mezzanine level. Further review will be undertaken to determine whether it is feasible to consider the lift necessary for evacuation purposes, where only staff and approved contractors will have access to the building.

If it is determined that the platform lift can be upgraded to meet the requirements of London Plan Policy D5, it will be designed, installed and operated in accordance with BS EN 81-20, BS EN 81-70 and BS EN 81-76, and be provided with alternative power supplies as per Section G.2.2 of BS 9999:2017.

4.7 Passive Fire Safety Measures

Since the building construction is of a portal frame design and as such considered to be a single structural element due to the moment-resisting connections used, rather than splitting the structural performance requirements in line with the differing purpose groups, the most onerous value will be applied. Therefore, 60 minutes fire resistance loadbearing capacity (R) should be provided for structural elements, i.e., the portal frame. As per ADB Vol. 2 recommendations for portal frame buildings, this can be provided in the form of brick, block or concrete protection to the columns up to a protected ring beam.

The requirements for the provision of compartmentation, fire-resisting construction and fire doors are shown below in Table 3.

Table 3 - Fire Resistance Requirements:

| Area | Fire Resistance Requirements | Exposure | Fire Doors |
|----------------------------|------------------------------|----------------|------------|
| Protected stair enclosures | REI 30 | From each side | FD 30S |
| Compartment walls | REI 60 | From each side | FD 60 |
| Protected stair lobbies | REI 30 | From each side | FD 30S |
| Evacuation lift enclosure | REI 30 | From each side | FD 30 |
| Storage areas | REI 30 | From each side | FD 30 |
| Plant rooms | REI 30 | From each side | FD 30 |

| Area | Fire Resistance Requirements | Exposure | Fire Doors |
|--|------------------------------|----------------|------------|
| Enclosure containing life safety equipment or secondary power supply to life safety equipment. | REI 120 | From each side | FD 60S |
| Note: Period of resistance for Loadbearing (R), Integrity (E), Insulation(I) | | | |

In general, internal linings should achieve the surface spread of flame and fire classifications outlined in Table 4 as a minimum.

Table 4 - Surface Spread of Flame Requirements:

| Location | European Class |
|---|----------------|
| Small room of area not exceeding 30 m ² | D-s3, d2 |
| Other rooms | C-s3, d2 |
| Circulation spaces | B-s3, d2 |
| Parts of the wall area in rooms may be of poorer performance than specified above, but not poorer than Class D-s3, d2. This variation is limited to a total area not exceeding one half of the room floor area, subject to a maximum of 60 m ² . | |

4.8 External Fire Spread

4.8.1 External Wall Construction

External walls should be constructed such that they will not support fire spread at a speed that is likely to threaten people in or around the building.

Where distances to relevant boundaries are greater than 1,000 mm, 60 minutes fire resistance for loadbearing capacity and integrity (RE) and 15 minutes insulation (I) is required. The proposed manufacturer and certified system are currently under review and will be confirmed in later design stages.

Regulation 7(1A) prohibits the use of relevant metal composite materials in the external walls and specified attachments of all buildings of any height.

Relevant metal composite materials are defined (in regulation 2(6)(c)) as any panel or sheet, having a thickness of no more than 10 mm which is composed of a number of layers two or more of which are made of metal, alloy or metal compound and one or more of which is a substantial layer made of a material having a gross calorific value of more than 35 MJ/kg when tested in accordance with BS EN ISO 1716. A substantial layer is defined as a layer which is at least 1 mm thick or has a mass per unit area of at least 1kg/m².

4.8.2 External Fire Spread

External walls should be constructed such that they will not support fire spread at a speed that is likely to threaten people in or around the building.

Where boundary distances on the north and west facades are restricted, noted as ~1.3 m from the building envelope, there will be limited capacity for unprotected area. It is therefore proposed that the external wall system will achieve a surface spread of flame rating of Class B-s3, d2 or better. This may be in the form of profiled or flat steel sheet at least 0.5 mm thick with an organic coating of no more than 0.2 mm thickness.

Furthermore, where boundary distances on the north and west faces are limited, and the escape route borders the perimeter, the elevation adjacent to the escape route should be protected to achieve a minimum fire resistance of RE 30, up to 1,100 mm above the finished floor level of the escape route.

The preliminary assessment of the maximum allowable unprotected area for each elevation has been undertaken using the guidance of ADB Vol. 2 Table 13.1. Where the building is divided between the respective purpose groups, this has been taken into consideration, as highlighted in Table 5 below. During later stages, more detailed calculation will be undertaken in accordance with BRE report BR 187 guidance.

Table 5 - External Fire Spread Assessment:

| No. | Elevation | Relevant Boundary Distance (m) | Unprotected Area (%) |
|-----|------------------|--------------------------------|----------------------|
| 1 | North (workshop) | 1.2 | 4 |
| 2 | East (workshop) | 36 | 100 |
| 3 | East (office) | 22.5 | 100 |
| 4 | South (office) | 8.75 | 70 |
| 5 | West (office) | 1.4 | 11 |
| 6 | West (workshop) | 1.4 | 5 |

4.8.3 Roof Coverings

Where relevant boundaries are less than 6 m from the building, the roof coverings should be of classification B_{ROOF}(t4).

Since the structure is a portal frame design, PVC rooflights covering ~10% of the reflected floor area and evenly spaced are required to provide heat release at the early stages of a fire through smoke venting.

The exact layout and classification of PVC rooflights are to be determined during the following design stages.

Refer to Section 4.13 for consideration of site-specific risks such as photo-voltaic (PV) panels.

4.9 Automatic Water Fire Suppression

No automatic water fire suppression systems (AWFSS) are to be provided as part of the project, where the uppermost storey of the building is below 30 m in height.

The provision of suppression systems is to be discussed with the building's insurer to ascertain whether there is a desire for property protection and business resilience.

4.10 Automatic Fire Detection and Alarm

The automatic fire detection and alarm system should achieve the minimum system standard of Category M for the office space. The justification for this is, the building occupants will be limited to staff and contractors, assumed to be familiar with the building layout and, at present, no active fire safety measures are proposed.

For the vehicle maintenance area, where fire hazards are expected to be present, a minimum system standard of Category P2 M is to be installed.

Systems are to be designed to BS 5839-1:2017 criteria. Upon consultation with the building's insurer, a more onerous Category system may be selected to heighten the property protection and resilience.

Where the building is to operate a simultaneous evacuation procedure, an acknowledgement or investigation period is not proposed.

4.11 Fire Appliance Access

Where the building's floor area is less than 2,000 m², and the height of the uppermost storey is less than 11 m, 15% of the building's perimeter should be accessible for a pump appliance. Where the building's perimeter is noted as ~162.6 m, 24 m should be accessible. From drawings provided, over 50 m appears available (>30%), and therefore deemed suitable.

The east elevation of the building provides Fire and Rescue Service access from an access road off Therapia Lane. As part of the project, an additional access point is proposed from Coomber Way. This will add further access for attending Fire and Rescue Services. Figure 3 below outlines the existing access route and notes proposed future provisions:



Figure 3 - Indicative fire vehicle access route

The layout for the hardstanding car park at the front of the building appears to provide suitable access to the building, as well as appropriate hammerhead turning facilities for Fire and Rescue Service vehicles, where they will be required to reverse for a distance greater than 20 m.

The route to and around the building should be appropriate for pump appliance access. ADB Vol. 2 recommendations are noted in Table 6 below and should be confirmed by the Local Fire and Rescue Service.

Table 6 - Pump Firefighting Appliance Access Requirements:

| Minimum Access Route Specification | Dimension |
|------------------------------------|-----------|
| Width between kerbs. | 3.7 m |
| Width between gateways. | 3.1 m |
| Turning circle between kerbs. | 16.8 m |
| Turning circle between walls. | 19.2 m |
| Clearance height. | 3.7 m |
| Carrying capacity. | 14 tonnes |

Note: The carrying capacity has been increased from 12.5 tonnes to reflect LFPA Guidance Note, GN 29, which notes the minimum carrying capacities for London Fire Brigade appliances.

4.12 Firefighting Access and Equipment

The existing building is less than 18 m in height, a dry rising main is not required for ADB Vol. 2 compliance.

Water will be supplied for fire-fighting use via the public hydrant system. The current provision of hydrants is unknown, but where the surrounding layout is existing, hydrants should be located no more than 90 m from an entry point of the building, though this is to be confirmed as part of the works.

A water supply capable of providing a minimum 1500 litres per minute at all times is recommended. Water supplies will be designed and installed in accordance with BS 9990.

Fire extinguishers should be provided throughout the buildings. The type of extinguisher should be determined based on the use and content of each unit, in accordance with BS EN 3-7 and BS EN 3-10.

4.13 Site Specific Risks

Since the site will serve as a vehicle servicing and maintenance depot, it is proposed that a fuel store will be provided to facilitate an efficient service, as noted within the client brief. At present, the design is for a 30,000 L (30 m³) tank to be provided, with capacity to refuel two vehicles at any one time. The proposed fuel to be stored will be hydrotreated vegetable oil (HVO), which is considered a flammable liquid. Guidance for such processes is to be taken from the FPA's RC57: Recommendations for fire safety in the storage, handling and use of highly flammable and flammable liquids: storage in external fixed tanks, and the HSE's HSG176 Storage of flammable liquids in tanks, so that adequate fire safety measures are incorporated in the design.

In an effort to future-proof the site, the provision of extensive electric vehicle (EV) charging is under consideration. Where there will be a mixture of EV charging, internal combustion engine (ICE) parking and a fuel store / refuelling point, the appropriate siting of these elements is crucial to limit the potential for fire spread and damage to property. The design criterion of Approved Document S has been applied for EV charging and supplemented by the recommendations of The FPA's document RC59: *Recommendations for fire safety when charging electric vehicles*.

In order to meet sustainability criteria, photo-voltaic (PV) panels are to be installed on the canopy section of the building's roof. Where appropriate, design recommendations will be taken from The FPA's document RC62: Recommendations for fire safety with photovoltaic panel installations and supplemented with the CFPA-E *Guideline No 37:2018 F: Photovoltaic systems: Recommendations on loss prevention*, if deemed necessary following an insurance consultation.

5 Future Development of the Asset and the 'Golden Thread' of Information

The 'Golden Thread' refers to a concept where the fire safety information of a building is to be updated and maintained throughout the whole life cycle of the building. The fire safety information should be maintained and updated as the development evolves in line with the principles of the golden thread.

Under Regulation 38 of the Building Regulations, a fire safety strategy report should form part of the information handed over to the management company to enable them to be effective.

Those fire safety elements identified within the fire strategy may only be modified following suitable review and approval under the Building Regulations by a building control body.

The Regulatory Reform (Fire Safety) Order 2005 (FSO) places legal obligations on management. Under the Order, the responsible person must carry out a fire safety risk assessment and implement and maintain a fire management plan.

In workplaces, the responsible person is the employer or anyone who has any extent of control over the premises. Some examples include a branch manager, building supervisor, the facilities management company, etc.

Building management should develop fire safety plans, fire safety manuals, a management and evacuation plan, and an emergency information pack for the Fire and Rescue Service. The information should be kept up to date. Management of fire safety must be integrated with all other management systems.

Management systems should also include procedures for anticipating and taking into account, either on a permanent or a temporary basis, changes to the occupancy (e.g., number of occupants, the familiarity of occupants, and / or fire growth characteristics (e.g. types of combustibles including fire growth rates, the quantity of combustible storage / use of combustibles including high-risk items, etc) of the building and its contents over the life cycle of the building.

Maintenance and testing are essential to ensure that fire safety systems will operate correctly in the event of a fire. Good housekeeping will be encouraged to ensure that the effectiveness of the fire safety provisions is not adversely affected.

6 Declaration and Recommendations

6.1 Declarations

The fire safety of the proposed development and the fire safety information is developed to satisfy the requirements of London Plan Policy D12A and London Plan Policy D12B, noting that there is no material change of use and that the LBoS Planning team have determined the project to be a Minor Development.

The proposed development is developed to satisfy the London Plan Policy D5(B5) requirement for fire evacuation lifts.

This assessment is based on the recommendations of Approved Document B (fire safety) Volume 2: Buildings other than dwellings, 2019 edition incorporating 2020 and 2022 amendments.

6.2 Design Recommendations

External fire spread of the façade to the relevant boundaries to be evaluated in detail during the next design stage.

The provision of PVC rooflights to allow for smoke venting is to be evaluated in detail during the next design stage.

The provision of hydrants is to be confirmed on site.

7 Supporting Information

Table 7 - Information Received:

| Document ID | Document / Drawing Title | Rev |
|--------------------------|--|-----|
| WDC-R721-01 | Topographical Survey | 01 |
| TLVD-BAP-XX-ZZ-RP-A-0001 | BAP Stage 01 Report | 01 |
| LAO8655X | Therapia Lane Site Plan | 01 |
| 10029-D1001 | Parking Layout Sketch | 01 |
| - | Willmott Dixon Fire Safety Requirements Policy | 11 |
| 31-35 | London Borough of Sutton Local Plan Policy | 01 |