

7a Eccleston Street, London, SW1W 9LX

(conversion of existing commercial use to a single private residential unit)

Client: Grosvenor

Document type: RIBA Stage 2: Concept Design

Document date: 30th January 2024

RBFC reference: 2023-53 R1



Document history			
Revision	Date	Description	Author
00	30 th January 2024	RIBA Stage 2 issue to client/ project team	MR

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Executive Summary

Red Brick Fire Consulting Limited has been appointed by Grosvenor Limited (the client; also referred to as 'Grosvenor' within this report) to provide fire safety input to the proposed change of use project at 7a Eccleston Street, London, SW1W 9LX. The proposed scheme is being architecturally designed by GRA Architecture & Interiors Ltd.

7a Eccleston Street is an existing commercial unit forming part of a wider existing building with a separate 7 Eccleston Street demise. The building was originally constructed in ca.1845, and consists of basement, ground, 1st to 3rd floors; 7a Eccleston Street is accessed at ground floor level, with accommodation provided on 1st to 3rd floors. The 7 Eccleston Street demise (basement and ground floor levels) is separated, and is not within the scope of the project nor this fire strategy report. The proposed project looks to change the use of 7a Eccleston Street to a residential dwelling (3-bedroom unit).

The fire strategy report has been produced at the RIBA Stage 2: Concept Design milestone. This report sets out the fire safety protection measures considered required in order for the proposed project to satisfy the relevant requirements of Part B1 to B5 of the Building Regulations 2010, and identifies fire safety management related items that should be noted and addressed by the client. It is intended that this RIBA Stage 2 fire strategy report is included in the required local planning authority submission relating to the proposed project.

Approved Document B Volume 1 (2019, inc. 2020 and 2022 Amendments) (ADB) has been applied as the benchmark fire safety design guidance to the project. Under this guidance, the following key fire strategy items have been identified as being needed to be implemented to support the proposals at this stage:

- Simultaneous evacuation strategy to be implemented within the 7a Eccleston Street demise.
- Grade A Category LD1 automatic fire detection and alarm system to BS5839: pt 6 to be provided within the demise.
- Automatic fire suppression system to be provided within the residential unit; this could potentially take the form of an automatic sprinkler system to BS9251: 2021 or an automatic water mist system to BS8458: 2015.
- The single egress staircase serving the demise will need to be configured as a protected staircase.
- A fire resisting separation/ fire compartmentation strategy needs to be adopted to provide protection to the single stair, protection between floors, and protection between the separate 7 and 7a Eccleston Street occupancies/ demises.
- Internal wall and ceiling linings will need to achieve a reaction to fire performance in line with ADB guidance.
- Any new interventions to external walls will need to ensure that new materials (apart from those materials excluded under Regulation 7(3) of the Building Regulations 2010) achieve a fire performance classification of A2-s1, d0 or better. This is considered necessary as a pro-active measure to meet the expectations of the Grosvenor Fire Policy.
- Space separation/ boundary conditions are considered to be as per the existing conditions.
- Fire service access arrangements are considered to be as per the existing conditions, with an existing fire hydrant located opposite the property.

As part of RIBA Stage 3 it will need to be further reviewed and confirmed with the project team what the nature of existing construction is of the single staircase and its enclosure, the floor structures, the party walls, and the walls/ floors separating the 7 and 7a Eccleston Street demises; all of these areas will require specific fire performance criteria to be satisfied under ADB in order to facilitate and support the change in use from



commercial to residential dwelling, thus it is crucial to define what the existing conditions may be able to achieve in this context, and what fire performance upgrade works may be required.

At this stage, it is considered that the current concept design and associated fire strategy for the project can be successfully developed further during RIBA Stages 3 and 4. However, there are a number of design areas and systems related items that will need to be continue to be reviewed (and agreed in principle with the approving authority) during these onward RIBA Stages to ensure that the design of the development can be shown to satisfy the functional requirements of Part B of the Building Regulations 2010.

Sections highlighted in grey in this report identify key design items/ actions for the client and project team that will need to be reviewed and resolved moving through RIBA Stage 3.

Sections highlighted in blue within this fire strategy report identify key items for client information that will need to be considered and addressed as part of the fire safety management of the development.

It should be noted that the fire strategy documentation for the project will need to be further developed and updated during RIBA Stages 3 and 4 before it can be relied upon for Part B Building Regulations 2010 submission/ approvals purposes. At this stage no consultation has been had with a building control body in relation to the proposed fire strategy for the project.

A copy of this RIBA Stage 2 fire strategy report is expected to be included as part of the wider project information being submitted to the local planning authority.

A copy of this fire strategy report will be provided to the relevant Grosvenor Project Manager for client team review and approval purposes.



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1 Introduction

1.1 General

Red Brick Fire Consulting Limited has been appointed by Grosvenor to provide fire safety consultancy services with respect to the proposed change of use project at 7a Eccleston Street, London, SW1W 9LX. The proposed scheme is being architecturally designed by GRA Architecture & Interiors Ltd.

This fire safety strategy document has been produced by Red Brick Fire Consulting Limited. This document summarises the proposed fire safety strategy for the project at the RIBA Stage 2: Concept Design milestone and highlights additional fire safety management items that will need to be further considered by Grosvenor. It is intended that this fire strategy document be used to support the local authority planning application process for the project. Note, the fire strategy for the proposed project will need to be further developed to a RIBA Stage 4: Technical Design level of detail before it can be relied upon to support the required Building Regulations 2010 approvals process.

This document is intended for the sole use of Grosvenor, for the current (at the time of writing) 7a Eccleston Street project. It should not be used in full or in part to support any other scheme. It should be noted that this document is not a fire strategy for the out-of-scope 7 Eccleston Street, which is a ground floor/ basement commercial unit that is situated directly below the 7a Eccleston Street demise (see later comments).

Sections highlighted in grey in this report identify key items for client and project team consideration as the project moves into and beyond the RIBA Stage 3 design process.

Sections highlighted in blue within this fire strategy report identify key fire safety management related items that will need to be considered by Grosvenor.

This document is a performance-based fire strategy document, which is to be used to help inform other designers and disciplines involved in the project; the detailed design of fire safety systems (active and/or passive) to achieve the performance recommendations is to be completed by others. Red Brick Fire Consulting Limited is not liable or responsible for the designs produced by other consultants, sub-consultants, or sub-contractors.

Changes to the current design of the proposed scheme may invalidate the content of this fire safety strategy document; therefore, proposed changes to the scheme should be reviewed in order for the fire strategy to be appropriately updated/ amended where required.

1.2 Legislation and approvals

The primary fire safety related legislation applicable to this project are:

- The Building Regulations 2010 (Part B)
- The Regulatory Reform (Fire Safety) Order 2005
- The Building Safety Act 2022

The review documented in this fire strategy document has been completed cognisant of the relevant requirements of the above referenced legislation.

The proposed project is subject to review and approval under the Building Regulations 2010 by an appointed building control body. At this stage, no consultations have been had with building control with respect to the

^{240130 2023-53} R1 7A Eccleston Street, London



fire strategy for the proposed project; it is recommended that building control are engaged in relation to the fire strategy during the onward RIBA Stage 3 design process.

In addition to the above, the Construction (Design and Management) Regulations 2015 (CDM) apply to all building and construction work and includes new build, demolition, refurbishment, extensions, conversions, repair, and maintenance. As part of developing the proposed fire strategy and within the appointed scope of services, Red Brick Fire Consulting Limited has taken reasonable skill and care to eliminate, reduce, or control foreseeable risks (related to the fire strategy) that may happen during construction or maintenance and use of a building after it has been built.

1.3 Guidance documents

The following primary fire safety design guidance document has been referred to as part of developing the content of this fire strategy document:

• Approved Document B Volume 1: Dwellings (2019, inc. 2020 and 2022 Amendments) (ADB)

Additional supplementary guidance has also been applied where referenced in this report (e.g., specific British Standards for fire safety systems), with the version current at the time of writing referenced.

Where the design of the project proposes to move away from the above referenced guidance documents with fire engineering being applied (for example, to address a specific design item), this is clearly identified within this report. Note, where and alternative approach or fire engineering has been applied, the aim is still to ensure that the relevant functional requirement(s) of Part B of the Building Regulations 2010 can be satisfied.

1.4 Fire safety strategy objectives, and additional client/ insurer requirements

The main objective of this fire strategy document is to review the proposed design of the project, define the required fire strategy for the project, and demonstrate that the project can satisfy the relevant functional requirements of Part B of the Building Regulations 2010 (life safety).

For the purposes of this document and the relevant benchmark design guidance applied, the occurrence of reasonable, single accidental fire incidents/scenarios is considered.

Should Grosvenor wish any additional fire-related property protection/ insurer objectives to be addressed for this specific project, then these should be identified to Red Brick Fire Consulting Limited as soon as possible.

1.5 Grosvenor fire policy

As part of Red Brick Fire Consulting Limited's appointment to provide consultancy input at RIBA Stage 2, this fire strategy document has also been developed cognisant of Grosvenor's '*Grosvenor Limited; Fire policy*' (Version 1.12, April 2023) document. A copy of this fire strategy report will be provided to the relevant Grosvenor Project Manager for client team review and approval.

1.6 Plans and additional information

The content of this fire strategy document has been developed with reference to the following relevant plans, produced by GRA Architecture & Interiors Ltd.



Table 1 – referenced plans/ drawings

Plan/ drawing reference	Title
357-7 SK/12 A	Ground floor plan – as proposed
357-7 SK/13 A	First floor plan – as proposed
357-7 SK/14 A	Second floor plan – as proposed
357-7 SK/15 A	Third floor plan – as proposed
357-7 SK/17	Elevations – as proposed
357-7 SY/02	Ground floor plan – as existing
357-7 SY/03	First floor plan – as existing
357-7 SY/04	Second floor plan – as existing
357-7 SY/05	Third floor plan – as existing
357-7 SY/07	Elevations – as existing

Excerpts of the above plans have been included within this fire strategy report where necessary, with an annotated GA proposed plans of the areas being considered provided in Appendix A. The plans have also been used to help measure relevant egress route dimensions/ widths referenced within this report.

1.7 Fire safety management considerations

Appropriate fire safety design considers the way in which a building will be managed and occupied, and any reliance on an unrealistic/ unsustainable management regime cannot be considered to have met the requirements of the regulations. This fire strategy document has been developed cognisant of this.

Effectively managing fire safety throughout the life cycle of a building is critical. Implementing good fire safety management practices helps to reduce the risk of a potential fire from occurring, as well as ensuring that the building's fire protection measures (active and passive) and emergency procedures are working as intended and subject to appropriate review/ maintenance.

It is expected that the approved design fire strategy for a building is fully accounted for as part of the fire safety management practices and any fire risk assessments required to be completed. To assist the client, sections highlighted in blue within this fire strategy report identify key items that will need to be considered by the responsible person(s) as part of the fire safety management relating to this project.

1.8 Regulation 38 of the Building Regulations 2010

Regulation 38 applies to buildings subject to the requirements of the Regulatory Reform (Fire Safety) Order 2005. The aim of Regulation 38 is to ensure that the person responsible for the building has sufficient information relating to fire safety to enable them to manage the building effectively, including information that allows them to:

- Understand and implement the fire safety strategy of the building.
- Maintain any fire safety system provided in the building.
- Carry out an effective fire risk assessment of the building.

The approved fire safety strategy for the building should form part of the Regulation 38 information pack (and any other 'Golden Thread' fire safety information collated for the building) that is issued to the responsible person(s) upon completion. Therefore, it is essential that the fire strategy documentation continues to be



reviewed and updated both through the design stages and construction/handover stages to ensure that it provides an accurate reflection of the final condition of the building upon completion.

Further guidance relating to the information that is expected to be produced and handed over to the responsible person under Regulation 38 can be found in Approved Document B guidance.



2 Project description

2.1 Site location and building description

7a Eccleston Street, London, SW1W 9LX forms part of an existing five-storey building (Figures 1 and 2) along with the separate 7 Eccleston Street. The building, originally constructed ca.1845, consists of basement, ground, 1st to 3rd floors.

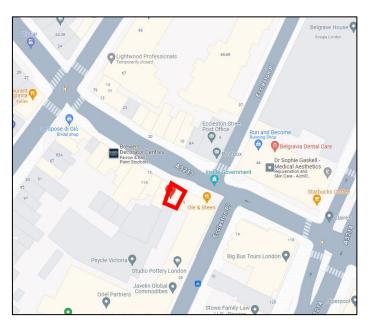


Figure 1 – site location (highlighted in red) (taken from Google Maps)



Figure 2 – property main frontage, door to 7a Eccleston Street on the left-hand side (highlighted red) (image taken from Google Street View)



As existing 7a Eccleston Street is used for commercial use purposes; it is accessed from street level via a dedicated door from/to external, which leads to a single staircase condition that serves accommodation on 1^{st} , 2^{nd} , and 3^{rd} floors. It is separated from 7 Eccleston Street, which is a commercial unit occupying the ground and basement levels of the holistic building; the 7 Eccleston Street demise is outside of the scope of this fire strategy document. Figures 3 to 6 indicate the existing layouts of the 7a Eccleston Street demise.



Figure 3 – existing ground floor

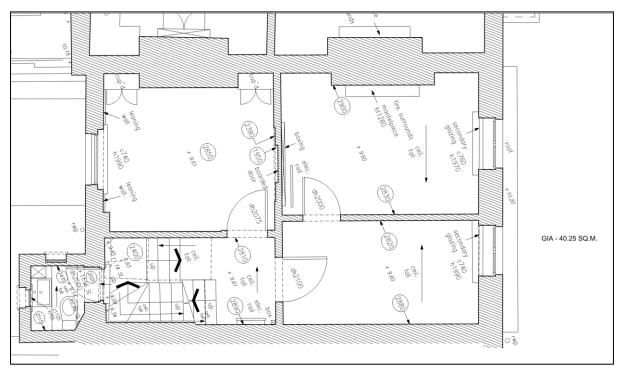


Figure 4 – existing 1^{st} floor



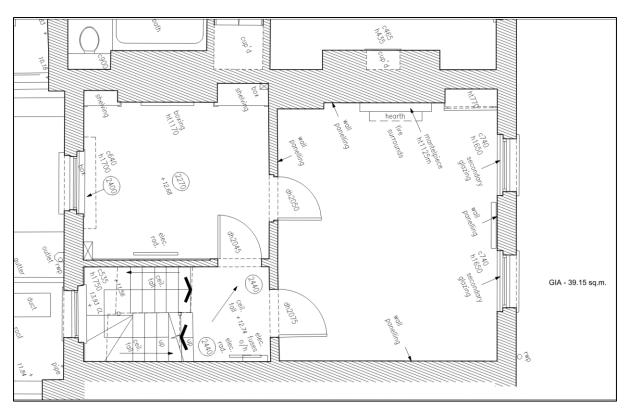


Figure 5 – existing 2nd floor

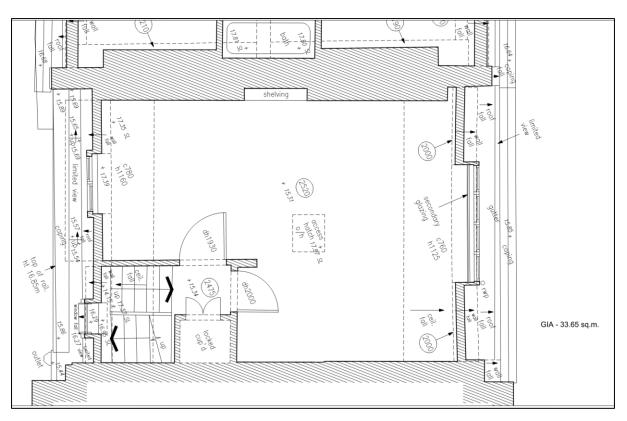


Figure 6 – existing 3rd floor



The proposed project looks to change the use of 7a Eccleston Street from commercial use to single private residential dwelling use (3-bedroom unit). It is proposed that the single staircase condition is retained, with the single private dwelling being arranged with accommodation across 1st to 3rd floors. Whilst replacement dormer windows are proposed at 3rd floor level on the front and rear elevation, no other significant changes are proposed to the external elevations of the building.

Based on the information available at this stage, the height of the 3rd floor above ground floor access level is considered to be 8.67m, with the height of the building (from ground floor access level to the highest point of the roof) considered to be 12.65m.

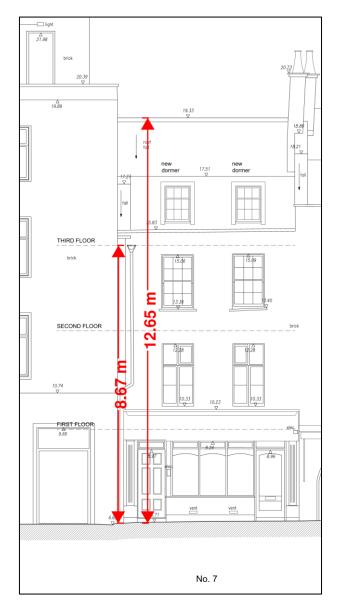


Figure 7 – indicative front elevation of building, with heights (m) shown



2.2 Approved Document B Purpose Group

When applying Approved Document B guidance, it is important to define the Purpose Group being applied to the project in question, as this determines the appropriate fire safety design criteria to be applied under the aforementioned guidance.

Under Approved Document B Volume 1 (2019, inc. 2020 and 2022 Amendments) the following Purpose Group is considered relevant to the proposed project:

• Purpose Group 1(a) Residential (dwellings) - flat

At this stage it is presumed that 7a Eccleston Street will be leased by Grosvenor to a single tenant as a single, multi-level residential flat unit. This will however need to be further reviewed and confirmed with Grosvenor.

2.3 Occupancy numbers

Under Approved Document B Volume 1 guidance, there is no specific guidance on the need to assess occupancy numbers in residential flat units. However, to provide context, for the purposes of this fire strategy document it is considered useful to provide an indication of the number of occupants who might be present in the 7a Eccleston Street demise. Assuming that each of the three bedrooms could be occupied by up to two people each, a total of 6 people is therefore considered present.



3 Requirement B1 – Means of warning and escape

3.1 Evacuation regime

A simultaneous evacuation regime will need to be implemented in the 7a Eccleston Street demise, where it is expected that all occupants in all areas of the demise are to simultaneously evacuate in the event of a fire in the demise.

The relevant responsible person(s) for the demise will need to agree upon a designated assembly point for evacuating occupants to; this is an appropriate area external and away from the building where occupants can safely gather after they have evacuated the building.

3.2 Means of detection and warning in case of fire

At this stage it is considered appropriate that the 7a Eccleston Street residential unit demise is provided with a minimum Grade A Category LD1 automatic fire detection and alarm system to BS5839: pt 6 2019 + A1: 2020.

Note, Category LD1 coverage involves a system installed throughout the premises, incorporating detectors in all circulation areas that form part of the escape routes from the premises, and in all rooms and areas, other than those with negligible sources of ignition, such as toilets, bathrooms and shower rooms.

As stated in section 8.1.2 of BS5839: pt. 6 (2019 +A1: 2020), the greatest benefit to life safety is given by a fullcoverage system (Category LD1). Such a system gives the earliest practicable warning of fire to occupants, wherever ignition occurs.

At this stage it is considered not strictly necessary to link the fire alarm system proposed for the 7a Eccleston Street demise to any fire detection system covering the separate 7 Eccleston Street demise. Whilst the 7 Eccleston Street demise is outside of the scope of this fire strategy document, it is however recommended as part of RIBA Stage 3 that further information is sought via Grosvenor as to whether an automatic fire detection and alarm system is provided to the 7 Eccleston Street demise and if so whether this is provided with any form of remote monitoring link to an appropriate alarm receiving centre.

3.3 Key means of escape design criteria

Under ADB guidance, the following key relevant means of escape design criteria are considered relevant to the proposed 7a Eccleston Street demise:

- In mixed use buildings (such as the case with 7/7a Eccleston Street) separate means of escape should be provided from the residential use and any other use present.
- Under section 3.20 of ADB, a multi-storey flat with an independent external entrance at ground level is similar to a dwellinghouse and means of escape should be planned on the basis of Section 2 of ADB, depending on the height of the top storey above ground level.
- Under section 2 of ADB, the proposed 7a Eccleston Street demise will have upper storeys more than 4.5m in height above ground floor level. With the proposed top-occupied 3rd floor being 8.67m in height above ground floor level, the means of escape arrangements for the residential unit need to be benchmarked against Diagram 2.1(d) of ADB, as shown in Figure 8.



It will be expected that a protected staircase is provided, which is a stair separated by fire resisting construction (minimum REI 30 or more) at all storeys and provided with a dedicated final exit route at ground floor level. The design of the dwelling should also comply with either of the following:

a. Provide an alternative escape route from each storey more than 7.5m above ground level. At the first storey above 7.5m, the protected stairway should be separated from the lower storeys by fire resisting construction (minimum REI 30) if the alternative escape route is accessed via either of the following.

i. The protected stairway to an upper storey.

ii. A landing within the protected stairway enclosure to an alternative escape route on the same storey. The protected stairway at or about 7.5m above ground level should be separated from the lower storeys or levels by fire resisting construction (see Diagram 2.4 of ADB).

b. Provide a sprinkler system throughout, designed and installed in accordance with BS 9251: 2021. If an automatic sprinkler system to BS9251: 2021 is not practical/ feasible, then it would appear reasonable for an automatic water mist suppression system to BS8458 2015 to be used as an alternative to address this item, subject to building control agreement (note: the use of such an automatic water mist suppression system for multi-storey dwellings is currently accepted under other BS9991: 2015 guidance).

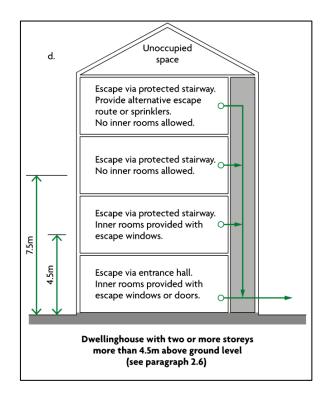


Figure 8 – excerpt of Diagram 2.1(d) taken from Approved Document B Volume 1 (2019, inc. 2020 and 2022 Amendments)

It does not appear that an independent alternative means of escape route can be provided from the proposed accommodation at 3rd floor level, therefore at this stage the design of the proposed residential unit will need to incorporate the provision of an automatic fire suppression system (sprinkler



or water mist system) throughout the dwelling. This will need to be further reviewed and developed as part of RIBA Stage 3.

3.4 Horizontal and vertical means of escape – proposals

- Reference should be made to the annotated proposed GA plans provided in Appendix A of this report for context.
- The 7a Eccleston Street demise will continue to be served by an entrance/ final exit route that is separated from the 7 Eccleston Street commercial unit. There will be no sharing/ linking of egress routes between 7a and 7 Eccleston Street. The final exit door at ground floor level from 7a Eccleston Street to external appears to be able to achieve 800mm clear width, which is considered acceptable for egress purposes in this specific case.
- The single staircase approach serving the ground to 3rd floors within 7a Eccleston Street will be retained. This staircase will need to be suitably protected as a 'protected staircase'; see later comments in section 5 of this report. As existing the single staircase provides a width of ca.830mm at its narrowest points; this is considered reasonable for egress purposes based on the relatively low number of occupants expected to be present within the residential unit at any one time (note: the suitability of the existing stair widths in the context of ADM guidance and inclusive design will need to be discussed and agreed between the project team and building control).
- As outlined in previous section 3.3, as an independent alternative egress route cannot be provided from the 3rd floor, an automatic fire suppression system will need to be provided within the 7a Eccleston Street demise; see later comments in section 5 of this report.
- At this stage the indicative door widths from the individual rooms forming the dwelling into the single staircase egress route appear to be able to achieve 750-850mm clear width depending upon the door. Whilst these widths are considered reasonable for egress purposes in this specific case, the clear door widths provided by the doors will need to continue to be reviewed through the onward RIBA Stage 3 process (note: the suitability of the door widths in the context of ADM guidance and inclusive design will need to be discussed and agreed between the project team and building control).
- Whilst there are no travel distance limitations imposed under ADB guidance in this case in regard to the internal layouts of individual rooms, due to the relatively small footprint area of the building the occupant travel distances from the furthest parts of the rooms to the storey exit doors leading into the single staircase will be low.
- At 2nd floor level it is proposed to have an inner room condition involving an en suite bathroom (the inner room) and bedroom 1 (the access room); whilst ADB guidance recommends that inner rooms are avoided, in this specific case it is considered that the proposed en suite bathroom arrangement is reasonable on the basis of the use of the rooms involved, the low expected occupancy, the low travel distances involved, and the proposed provision of the Category LD1 automatic fire detection and alarm system to BS5839: pt 6.
- Inward opening doors on escape routes are proposed within the demise; this is considered acceptable on the basis that there will be less than 60 people present, and occupants can reasonably be expected to be familiar with the dwelling layout.



- Whilst not called for under ADB guidance, it is recommended to the client that consideration is given to the provision of emergency lighting (to BS5266: pt 1, which could be integrated into the normal light fittings in this area) to the means of escape staircase within the proposed dwelling as an enhancement. This is considered beneficial due to the height of the stair and the enclosure having limited natural light provision at ground floor level.
- All escape routes will require a minimum clear headroom of 2000mm in height.
- The materials used in the construction of the existing single escape staircase will need to be reviewed and confirmed with the project team as part of RIBA Stage 3. Under ADB guidance it would be expected that the flights and landings of escape stairs should be constructed of materials achieving class A2-s3, d2 or better; if this cannot be met (for example, due to the existing staircase being formed of timber) then this will need to be further reviewed to ascertain if a reasonable alternative design solution/ justification can be agreed with building control.
- Doors on escape routes within and from the demise should be readily and easily openable to avoid undue delay to people escaping.

3.5 Fire safety information for residents

The responsible person(s) for the building/ the residential unit will need to ensure that adequate fire safety information is provided to the incoming residents, so that residents are aware of how to prevent fire in the first instance, the emergency plan arrangements for the building/ site, and fire protection measures in place. Such information could be provided, for example, as part of a resident's handbook for the property. Additional information relating to the type of information that can be provided to residents can be found in Annex F of BS9991: 2015.

It is also recommended that the relevant responsible person(s) and the occupier(s) also make reference to fire safety in the home guidance, in order to help minimise the potential risks relating to fire in the building and to make a suitable escape plan. For example, further guidance relating to this item can be found on the London Fire Brigade website (e.g., www.london-fire.gov.uk/safety/the-home).



4 Requirement B2 – Internal fire spread (linings)

Although they are unlikely to be the first materials to ignite, the choice of materials for walls and ceilings can significantly affect the spread of a fire and its rate of growth and should be selected carefully. In particular, internal linings selected for circulation spaces should have non-flammable characteristics that can delay the spread of fire, so that the occupants' means of escape is not compromised.

To inhibit the spread of fire within the building, the internal linings shall adequately resist the spread of flame over their surfaces; and have, if ignited, either a rate of heat release or a rate of fire growth, which is reasonable in the circumstances. "Internal linings" means the materials or products used in lining any partition, wall, ceiling or other internal structure.

For the purposes of this requirement, a wall includes both of the following:

- a. The internal surface of internal and external glazing (except glazing in doors).
- b. Any part of a ceiling which slopes at an angle greater than 70 degrees to the horizontal.

A wall does not include any of the following:

- Doors and door frames.
- Window frames and frames in which glazing is fitted.
- Architraves, cover moulds, picture rails, skirtings and similar narrow members.
- Fireplace surrounds, mantle shelves and fitted furniture.

For the purposes of this requirement, a ceiling includes all of the following:

a. Glazed surfaces.

b. Any part of a wall at 70 degrees or less to the horizontal.

- c. The underside of a gallery.
- d. The underside of a roof exposed to the room below.

For the purposes of this requirement, a ceiling does not include any of the following.

- Trap doors and their frames.
- The frames of windows or rooflights and frames in which glazing is fitted.
- Architraves, cover moulds, picture rails, exposed beams and similar narrow members.

Further guidance relating to wall and ceiling linings can be found in section 4 of Approved Document B Volume 1 (2019, inc. 2020 and 2022 Amendments), and should be referred to by those specifying, procuring, and installing wall and ceiling lining materials and decoration.

For the areas within the scope of the proposed project, wall and ceiling linings will need to achieve the relevant fire performance classifications for the different areas as shown in Figure 9.



Table 4.1 Classification of linings	
Location	Classification
Small rooms of maximum internal floor area of 4m ²	D-s3, d2
Garages (as part of a dwellinghouse) of maximum internal floor area of 40m ²	
Other rooms (including garages)	C-s3, d2
Circulation spaces within a dwelling	
Other circulation spaces (including the common areas of blocks of flats)	B-s3, d2 ⁽¹⁾
 NOTE: Wallcoverings which conform to BS EN 15102, achieving at least class C-s3, d2 and substrate, will also be acceptable. 	l bonded to a class A2-s3, d2

Figure 9 – wall and ceiling lining fire performance criteria (excerpt taken from Approved Document B Volume 1 (2019, inc. 2020 and 2022 Amendments))



5 Requirement B3 – Internal fire spread (structure)

5.1 General

Performance in terms of the fire resistance to be achieved by elements of structure, doors and other forms of construction is classified in accordance with one of the following:

- BS EN 13501-2.
- BS EN 13501-3
- BS EN 13501-4.

Fire resistance is measured in minutes. This relates to time elapsed in a standard fire test.

Further information relating to the fire performance expectations of materials, products, and structures can be found in Appendix B of Approved Document B Volume 1 (2019, inc. 2020 and 2022 Amendments).

5.2 Automatic fire suppression systems

As existing the 7a Eccleston Street demise in not provided with automatic fire suppression system protection.

As outlined in previous section 3.3 of this report, with the proposed change of use to a multi-level residential dwelling, under benchmark ADB guidance there will be a need for the residential dwelling unit to be protected by an automatic fire suppression system. At this stage it is considered that this could take the form of either an automatic sprinkler system to BS9251: 2021, or potentially an automatic water mist system to BS8458 2015; the potential use of the latter type of system will however need to be specifically reviewed and agreed with the appointed building control body for the project.

Note, as the top 3rd floor storey of the building is less than 11m in height above ground level, it is not expected under ADB guidance that the full holistic building of 7/7a Eccleston Street needs to be protected by an automatic fire suppression system; however, it is crucial to ensure that the different 7/7a Eccleston Street demises/uses are separated from one another by adequate fire compartmentation, as outlined in later section 5.4 of this report.

5.3 Elements of structure

If one element of structure supports or stabilises another, as a minimum the supporting element should have the same fire resistance as the other element.

The following are excluded from the definition of 'element of structure':

- A structure that supports only a roof, unless either of the following applies.
 - i. The roof performs the function of a floor, such as for parking vehicles, or as a means of escape.
 - The structure is essential for the stability of an external wall that needs to be fire resisting (e.g., to achieve compartmentation or for the purposes of preventing fire spread between buildings).
- The lowest floor of the building.
- A platform floor.
- External walls, such as curtain walls or other forms of cladding, which transmit only self-weight and wind loads and do not transmit floor load.

In some cases, structural members within a roof may be essential for the structural stability system of the building. In these cases, the structural members in the roof do not just support a roof and must demonstrate the relevant fire resistance for the building as required.

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Under Table B.4 of Approved Document B Volume 1 (2019, inc. 2020 and 2022 Amendments) the elements of structure for 7a Eccleston Street would be expected to be protected to a minimum 60 minutes fire resistance for life safety purposes, based on the top floor height being more than 5m but less than 11m above ground floor level, and the wider holistic building also being formed of the commercial use at 7 Eccleston Street.

Note, when considering guidance in sections 6.5 to 6.7 of Approved Document B Volume 1 (2019, inc. 2020 and 2022 Amendments) (Figure 10), as the building is also more than three storeys there would be an expectation that the elements of structure are protected to the minimum 60 minutes fire resistance.

Conversion to flats

- **6.5** Where an existing dwellinghouse or other building is converted into flats, a review of the existing construction should be carried out. Retained timber floors may make it difficult to meet the relevant provisions for fire resistance.
- **6.6** In a converted building with a maximum of three storeys, a minimum REI 30 fire resistance could be accepted for elements of structure if the means of escape conform to the provisions of Section 3.
- **6.7** In a converted building with four or more storeys, the full standard of fire resistance given in Appendix B is necessary.

Figure 10 – excerpt of sections 6.5 to 6.7 from Approved Document B Volume 1 (2019, inc. 2020 and 2022 Amendments)

7a Eccleston Street is an existing building, therefore it will need to further reviewed with the project team during RIBA Stages 3 what level of fire protection is thought provided to the existing elements of structure (including floor structures), where upgrades to improve the fire protection to the elements of structure may be required/ possible, and whether there are any potential deviations from the ADB guidance referenced above that need to be considered/justified/discussed with building control.

New elements of structure introduced as part of the project will be expected to be protected to the minimum 60 minutes fire resistance.

5.4 Fire compartmentation/ fire resisting separation

The floor areas of 7a Eccleston Street are considered to be within the maximum accepted fire compartment sizes under relevant Approved Document B guidance.

It should be noted that the party wall construction between 7a Eccleston Street and other adjacent/ neighbouring buildings are intended to remain. Therefore, the recommendations made in this section of the fire strategy report with respect to these walls relate primarily to making good and similar works and ensuring that these works account for a need for fire resisting protection. It will need to be reviewed with the project team as part of RIBA Stage 3 what the nature of construction of the party walls is considered to be.

As part of RIBA Stage 3 it will also need to be reviewed what the nature of the floor construction is within the building. Under current ADB guidance it would be expected that the floor structures are protected to REI 60 minutes fire resistance (method of exposure from underside), with all floor construction at ground and 1st floor separating the proposed dwelling from the 7 Eccleston Street commercial unit below being REI 60 fire compartment floors. Similarly, it will also be expected that the ground floor wall construction separating the 7 and 7a Eccleston Street demises is minimum REI 60 minutes fire resisting; the nature of the existing wall construction in these areas will therefore also need to be further reviewed with the project team.



It should be noted that with the proposed change of use to a residential dwelling, ensuring that there is minimum 60 minutes fire resisting compartmentation between the 7 and 7a Eccleston Street demises is crucial to the project, and it will need to be confirmed how the existing construction achieves, or can be upgraded to achieve, this required level of fire protection.

Note, in line with Appendix B of Approved Document B Volume 1 (2019, inc. 2020 and 2022 Amendments), this report uses the European classification system for fire resistance set out in BS EN 13501-2 to 4. For further information refer to Appendix B and Table B3, and Appendix C of Approved Document Volume 1 (2019, inc. 2020 and 2022 Amendments). There may be some products lawfully on the market using the classification system set out in previous editions of ADB; in those situations, the equivalent BS476 classifications as outlined in Appendix B of Approved Document B Volume 1 (2019, inc. 2020 and 2022 Amendments) may be used.

At this stage it is considered that the following approach outlined in Table 2 should be adopted with respect to fire resisting separation associated with the proposed project. Reference should also be made to the annotated GA plans provided in Appendix A of this fire strategy document. The fire resisting separation/ fire compartmentation strategy will need to continue to be reviewed and developed during RIBA Stages 3 and 4.

Item/ area	Minimum period of fire resistance: Loadbearing/ Integrity/ Insulation (R/E/I) performance	Minimum relevant fire door rating	Type of exposure
Floor structures NOTE 1	60/60/60	n/a	From underside
Work relating to the party walls separating 7a Eccleston Street from neighbouring buildings NOTE 2	60/60/60	n/a	Each side separately
Enclosure to the main internal staircase NOTE 3	60/60/60	E30	Each side separately
Cavity barriers NOTE 4	30/30/15	n/a	Each side separately

Table 2 – summary of applicable fire compartmentation/ fire resisting separation

NOTE 1: It will need to be further confirmed/ reviewed with the project team what level of fire protection the existing floor structures may be able to achieve, and what fire resisting protection upgrade work may be required to achieve the required level of fire separation/ fire compartmentation. Note, this includes the floor structures separating the 7 and 7a Eccleston Street demises at 1st floor and ground floor levels.

NOTE 2: The existing party walls are being retained and the full extent of the existing construction is currently unknown; for the purposes of this fire strategy, it is considered that any significant making good/ repair work or fire stopping or similar works completed to these walls should achieve a minimum level of 60 minutes fire resistance as far as reasonably practicable.

NOTE 3: The nature of construction of the existing internal staircase enclosure will need to be further reviewed/ confirmed with the project team, to confirm if it does/ can achieve the required level of fire resistance. This includes the ground floor wall construction separating the single staircase condition from the adjacent 7 Eccleston Street demise.

NOTE 4: See section 5.6 of this fire strategy report.

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As part of RIBA Stage 3 it will need to be further reviewed and confirmed as to whether there are any existing vertical connections/ features such as chimneys, service riser shafts, etc within the 7a Eccleston Street demises that need to be considered from a fire compartmentation and fire stopping perspective.

5.5 Fire stopping (of building services, etc)

Any penetrations through fire resisting separation/ compartmentation made for the removal or passing of building services or similar should be appropriately fire stopped to the same period of fire resistance. Fire stopping is also required to fully complete the lines of fire resisting protection within a building provided by fire compartment walls and floors. Gaps or breaches in fire resisting walls and floors present a risk of allowing smoke and flame to pass from one area to another, thus it is essential to ensure that adequate fire stopping is provided to prevent this.

The choice of products or materials used for fire stopping should take into account the size and nature of the gap/ penetration present and any potential for movement. Proprietary fire stopping and sealing systems are available and may be used where they provide the adequate level of fire resistance and are appropriate for the specific application in question. Approved Document B provides guidance on additional methods of fire stopping that may be used and should be referred to by those responsible for designing and installing fire stopping for the project.

Fire stopping and fire protection to openings for pipes and/or mechanical ventilation and air conditioning services in the in-scope areas will need to be in line with section 9 of Approved Document B Volume 1 (2019, inc. 2020 and 2022 Amendments).

5.6 Concealed spaces and cavity barriers

Cavities/ concealed spaces in the construction of a building provide a ready route for the spread of smoke and flame, which can present a greater danger as any spread is concealed. For the purpose of this fire strategy and ADB guidance, a cavity is considered to be any concealed space.

To reduce the potential for fire spread in concealed spaces, cavity barriers should be provided to both divide cavities and to close the edges of cavities. Note, cavity barriers should not be confused with fire-stopping; these are two different provisions.

Figure 11 provides an indication of where cavity barriers are expected to be provided.



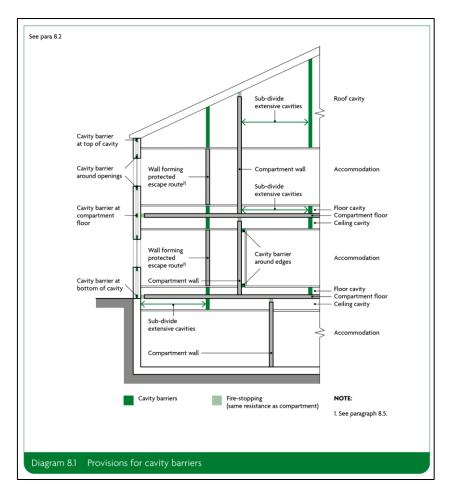


Figure 11 – provision of cavity barriers (Diagram 8.1 excerpt taken Approved Document B Volume 1 (2019, inc. 2020 and 2022 Amendments))

Should the proposed works create any new or reveal any existing cavities/ concealed spaces, then reference should be made to section 8 of Approved Document B Volume 1 (2019, inc. 2020 and 2022 Amendments) guidance with respect to the provision of cavity barriers to protect these features from fire. This item will need to continue to be reviewed with the project team during RIBA Stages 3 and 4, to identify any relevant cavities/ concealed spaces in the in-scope areas that require protection.



6 Requirement B4 – External fire spread

6.1 General

To demonstrate that the requirements of Part B4 of the Building Regulations 2010 can be met, the design of the proposed scheme needs to show that appropriate measures have been incorporated to:

- Resist fire spread over external walls and roof coverings
- Resist fire spread from one building to another

6.2 Regulation 7 of the Building Regulations 2010, and external walls

Attention is drawn to the Approved Document B Volume 1 (2019, inc. 2020 and 2022 Amendments) guidance document, which states the following text as shown in Figure 12.

Requirement	
Requirement	Limits on application
External fire spread	
B4. (1) The external walls of the building shall adequately resist the spread of fire over the walls and from one building to another having regard to the height, use and position of the building.	
(2) The roof of the building shall adequately resist the spread of fire over the roof and from one building to another, having regard to the use and position of the building.	
Regulation	
Regulation 7 – Materials and workmanship	
 Building work shall be carried out— 	
(a) with adequate and proper materials which—	
 are appropriate for the circumstances in which they are used, 	
(ii) are adequately mixed or prepared, and	
 (iii) are applied, used or fixed so as adequately to perform the functions for which they are designed; and 	
(b) in a workmanlike manner.	
(IA) Building work shall be carried out so that relevant metal composite material does not become part of an external wall, or specified attachment, of any building.	
(2) Subject to paragraph (3), building work shall be carried out so that materials which become part of an external wall, or specified attachment, of a relevant building are of European Classification A2-s1, d0 or A1 (classified in accordance with the reaction to fire classification).	



Regulation continued

(3) Paragraph (2) does not apply to-

- (a) cavity trays when used between two leaves of masonry;
- (b) any part of a roof (other than any part of a roof which falls within paragraph (iv) of regulation 2(6)) if that part is connected to an external wall;
- (c) door frames and doors;
- (d) electrical installations;
- (da) fibre optic cables;
- (e) insulation and water proofing materials used below ground level or up to 300mm above that level;
- (f) intumescent and fire stopping materials where the inclusion of the materials is necessary to meet the requirements of Part B of Schedule 1;
- (g) membranes;
- (h) seals, gaskets, fixings, sealants and backer rods;
- (ha) components associated with a solar shading device, excluding components whose primary function is to provide shade or deflect sunlight, such as the awning curtain or slats;
- thermal break materials where the inclusion of the materials is necessary to meet the thermal bridging requirements of Part L of Schedule 1;
- (j) window frames and glass; or
- (k) materials which form the top horizontal floor layer of a balcony which are of European Classification Alfl or A2fl-sl (classified in accordance with the reaction to fire classification) provided that the entire layer has an imperforate substrate under it.
- (4) In this regulation-

(a) a "relevant building" means a building with a storey (not including roof-top plant areas or any storey consisting exclusively of plant rooms) at least 18 metres above ground level and which—

- (i) contains one or more dwellings;
- (ii) contains an institution; or
- (iii) contains a room for residential purposes; and
- (b) "above ground level" in relation to a storey means above ground level when measured from the lowest ground level adjoining the outside of a building to the top of the floor surface of the storey.

Figure 12 – Regulation 7, excerpt taken from Approved Document B Volume 1 (2019, inc. 2020 and 2022 Amendments)

Regulation 7(2) has introduced major restrictions on the combustibility performance of materials used to form external walls and specified attachments of certain types of buildings (referred to as 'relevant buildings').

Note, under ADB guidance, the external wall of a building includes all of the following:

- Anything located within any space forming part of the wall.
- Any decoration or other finish applied to any external (but not internal) surface forming part of the wall.
- Any windows and doors in the wall.
- Any part of a roof pitched at an angle of more than 70 degrees to the horizontal if that part of the roof
 adjoins a space within the building to which persons have access, but not access only for the purpose
 of carrying out repairs or maintenance.



Whilst it is proposed that 7a Eccleston Street is to be used as a residential dwelling, it will not have a top storey height of more than 18m above ground floor level. Therefore, it does <u>not</u> qualify as a 'relevant building' under Regulation 7(2) of the Building Regulations 2010.

Notwithstanding this, to satisfy the expectations of the Grosvenor Fire Policy, it should be ensured that any new materials introduced as part of the project to the external walls/ envelope of the building (apart from those materials excluded under Regulation 7(3) of the Building Regulations 2010) achieve a fire performance classification of A2-s1, d0 or better. This item will need to be further reviewed with the project team as part of RIBA Stage 3.

6.3 Resisting fire spread over external wall surfaces

As existing, the external wall surfaces of the building are primarily formed of red brick and masonry, which are considered to present a relatively low fire risk with respect to external fire spread.

As outlined in section 6.2 above, in order to satisfy the Grosvenor Fire Policy, any new materials introduced to the external walls/ envelope of the building (apart from those materials excluded under Regulation 7(3) of the Building Regulations 2010) achieve a fire performance classification of A2-s1, d0 or better. This will also satisfy the guidance expectations of Table 10.1 of Approved Document B Volume 1 (2019, inc. 2020 and 2022 Amendments) guidance with respect to the fire performance of the external surfaces of the external walls.

It will need to be further reviewed with the project team during RIBA Stage 3 what potential works may be needed to the external walls of the building as part of the project. In particular, any potential insulation upgrade work will need to be identified, and it will need to be confirmed what roof pitches are involved in the existing dormer roof construction (note: any roof pitched at an angle of more than 70 degrees to the horizontal needs to be considered as an external wall).

6.4 Resisting fire spread from one building to another, and relevant boundary conditions

As existing the 7/7a Eccleston Street building forms part of a wider terraced block of buildings, with only the front and rear elevations of the building having relevant boundary conditions.

With the proposal involving a change of use from commercial to residential, and the residential dwelling needing to be protected by an automatic fire suppression system, it is considered that the existing conditions will be improved upon from an unprotected areas/ boundary conditions perspective.

On the front main elevation of the building, it is proposed that a large existing window opening at 3rd floor level will be replaced with two, separated new dormer windows. This proposed condition is considered acceptable.

On the rear elevation of the building, it is proposed to replace two existing window openings at 3rd floor level with two, separated new dormer windows (with one these being an enlarged dormer window to the internal protected staircases. This proposed condition is considered acceptable.

Whilst the proposed works to the 3rd floor relating to the new dormer windows are considered to be acceptable in this specific case, it is noted that at the rear of the building there is an existing condition involving a large shed-like structure (Figure 13; believed to be linked to the neighbouring property and not part of the 7/7a Eccleston Street building) that is constructed in close proximity to the external wall line of 7a Eccleston Street. The positioning of this separate structure appears to mean that the site boundary is the rear external wall of 7/7a Eccleston Street, which is an unusual condition as this rear wall as existing has a number of unprotected openings (which have clearly been there for a significant period of time). The proposed works for 7a Eccleston Street are considered not to make the existing conditions any worse, however as part of RIBA Stage 3 further

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review of this rear site boundary condition will need to be completed, including discussion of this area with the appointed building control body.

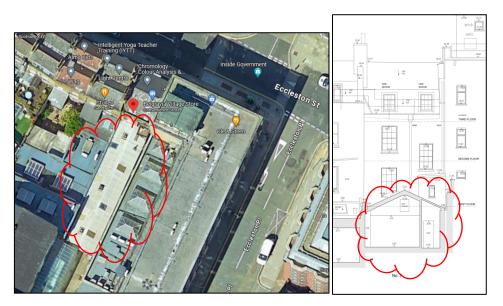


Figure 13 – existing structure (highlighted in red) at rear of 7a Ecclestone Street

6.5 Resisting fire spread over roof coverings

'Roof covering' describes one or more layers of material, but not the roof structure as a whole.

Based upon there being existing relevant boundary distances of less than 6m, along with the use and size of the building, any new roof coverings introduced as part of the project will need to achieve a minimum fire performance designation of $B_{ROOF}(t4)$ or better to BS EN 13501-5.



7 Requirement B5 – Access and facilities for the fire service

7.1 Fire service vehicle and firefighter access

Fire service vehicle access to 7a Eccleston Street will remain as per the existing condition; fire service vehicles will be able to access the building via the Eccleston Street public roadway, and can potentially park directly outside of the main entrance to the demise.

From a fire service vehicle parked on Eccleston Street outside of the property, firefighter hose coverage distances measured to the furthest points of the 3rd floor accommodation (measured along the mid-point of the single staircase condition) will be within 45m. No additional dedicated firefighting shaft/ firefighter facilities are therefore considered required for the 7a Eccleston Street demise.

Fire service vehicle access and firefighter access to the proposed 7a Eccleston Street residential unit is considered adequate and in line with ADB guidance.

7.2 Fire hydrant provision

The provision of adequate firefighting water supplies for use by the local fire and rescue service is a key consideration under Part B5 of the Building Regulations 2010.

The nearest existing fire hydrant to 7a Eccleston Street (Figure 14) is located opposite the building on the corner of Eccleston Place and Eccleston Street, and is considered to provide adequate coverage.



Figure 14 – existing fire hydrant (highlighted in yellow) located opposite 7a Eccleston Street (image taken from Google Street View)

7.3 Smoke ventilation provisions

Under current ADB guidance, no dedicated smoke ventilation measures are considered required for the in-scope project.



8 Conclusions

8.1 End of RIBA Stage conclusions

This fire safety strategy report documents the required fire safety provisions needed to support the proposed 7a Eccleston Street, London, SW1W 9LX change of use project at the RIBA Stage 2 milestone. It demonstrates that the proposed design can feasibly satisfy the functional requirements of Part B of the Building Regulations 2010, subject to further design development during RIBA Stages 3 and 4 and formal review and approval by the appointed building control body. Approved Document B Volume 1 (2019, inc. 2020 and 2022 Amendments) has been applied as the primary benchmark design guidance for fire safety design.

The contents of this report should be reviewed by the client and project design teams, with it checked that all relevant fire safety design requirements can and are appropriately integrated into the proposed scheme moving forwards.

It is important that all items highlighted in grey within this fire strategy report continue to be reviewed and addressed as the project moves into and through the onward RIBA Stage 3 design process.

Should the client team have any queries/ comments in relation to items highlighted in blue within this fire strategy report, then these should be confirmed as soon as possible.

This report is a performance specification for fire safety; the design detail of active and passive fire protection systems needed to satisfy the requirements of this fire strategy will need to be completed by other competent consultants/ contractors appointed to the project.

It is expected that this RIBA Stage 2 fire strategy report will be included as part of the documentation submitted to the local planning authority.

Note, the project fire safety strategy will need to continue to be developed to a RIBA Stage 4 level of detail before it can be relied upon to support the Part B Building Regulations 2010 approvals process. It is recommended that a building control body is engaged with during RIBA Stage 3 in order to review the project fire strategy and help to de-risk the approvals process moving forwards.

8.2 Key design items that need to be further reviewed/ resolved during RIBA Stage 3 (see text highlighted in grey within the main body of this report)

The following key fire safety related design items/ issues will all need to be further reviewed and resolved with relevant stakeholders as part of RIBA Stage 3 in order to further develop the fire safety strategy for the proposed development:

- Confirmation of whether there are any additional client/ insurer requirements to incorporate into the fire strategy that are in addition to Part B life safety considerations (for example, property protection or business continuity requirements).
- Review of this report by the appointed building control body, and discussion with them on the key fire strategy proposals and identified deviations from benchmark guidance.
- Clarification of the automatic fire detection and alarm system provision in the 7 Eccleston Street demise.

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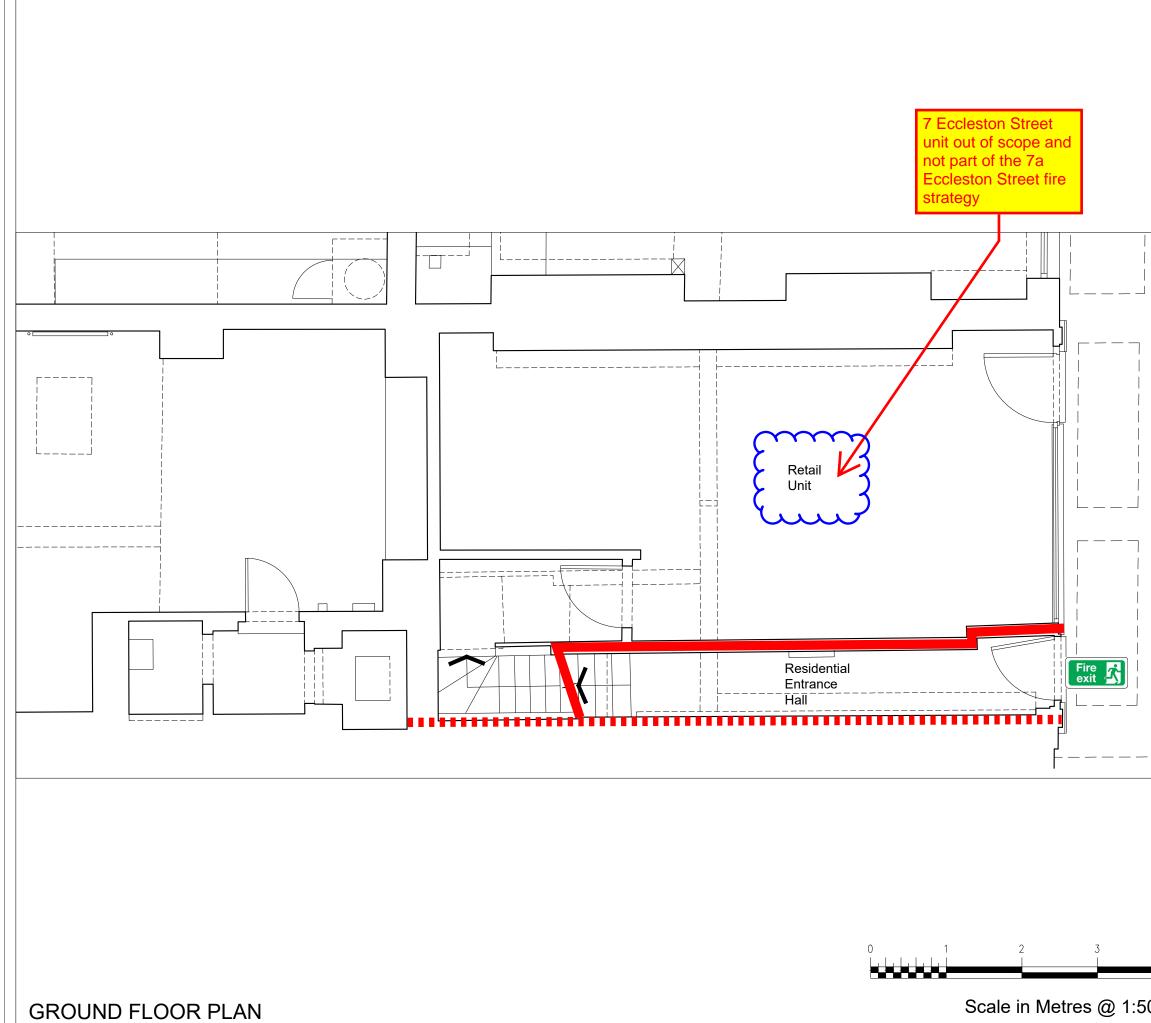


- Further review and development of the automatic fire suppression system protection requirements for the proposed residential dwelling.
- Confirmation of the nature of construction of the existing single means of escape staircase serving the above ground levels.
- Discussion with Grosvenor in relation to the recommendation to provide emergency lighting coverage to the single staircase egress route.
- Further review and clarification of existing construction (party walls, floor structures, staircase enclosure construction) present in the building and its potential fire performance, in relation to achieving the fire resisting protection/ separation requirements outlined in section 5 of this report. This is of particular importance in relation to the walls and floors separating the 7 Eccleston Street demise from the 7a Eccleston Street demise, as there needs to be a robust line of fire compartmentation between the two occupancies/ uses.
- Review of cavity barrier provisions.
- Review and clarification of proposed external wall works forming part of the project, and the nature of the existing dormer roof construction.
- Review of existing rear site boundary condition with building control in relation to Part B4 of the Building Regulations 2010.

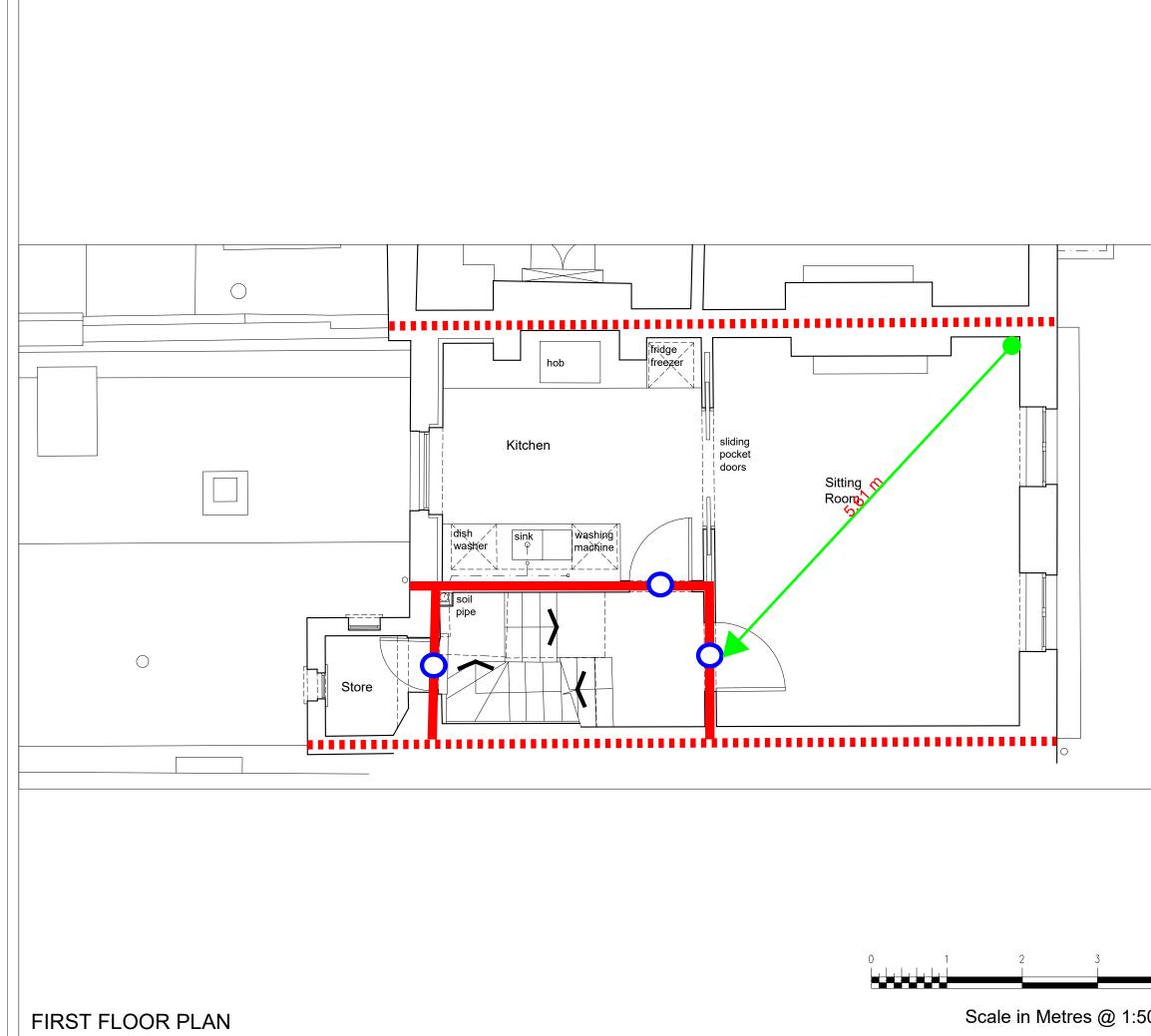


Appendix A – annotated GRA Architecture & Interiors Ltd proposed GA plans

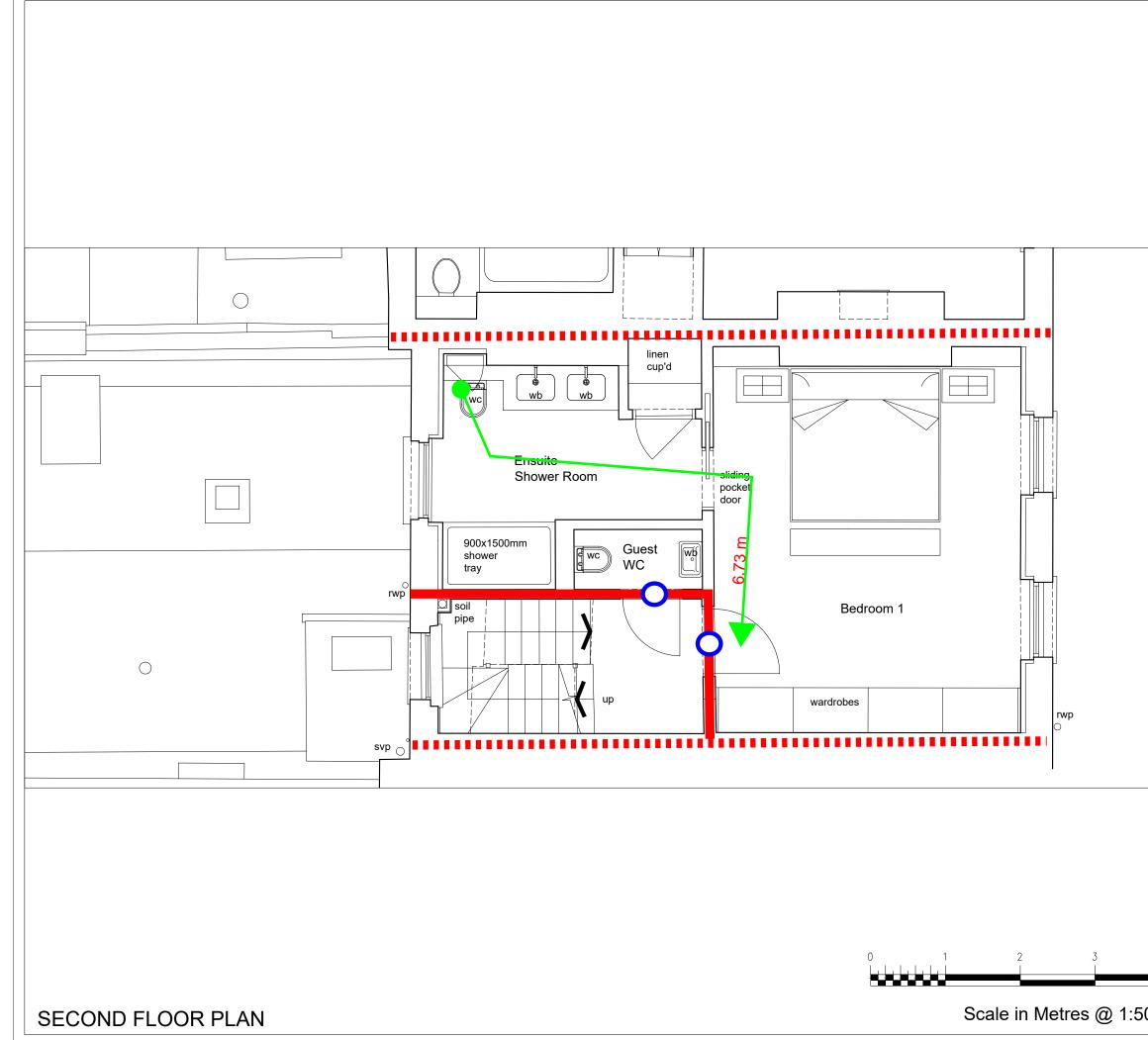
The following are copies of the proposed GA plans for the project produced by GRA Architecture & Interiors Ltd, with annotations relating to the fire strategy completed by Red Brick Fire Consulting Limited.



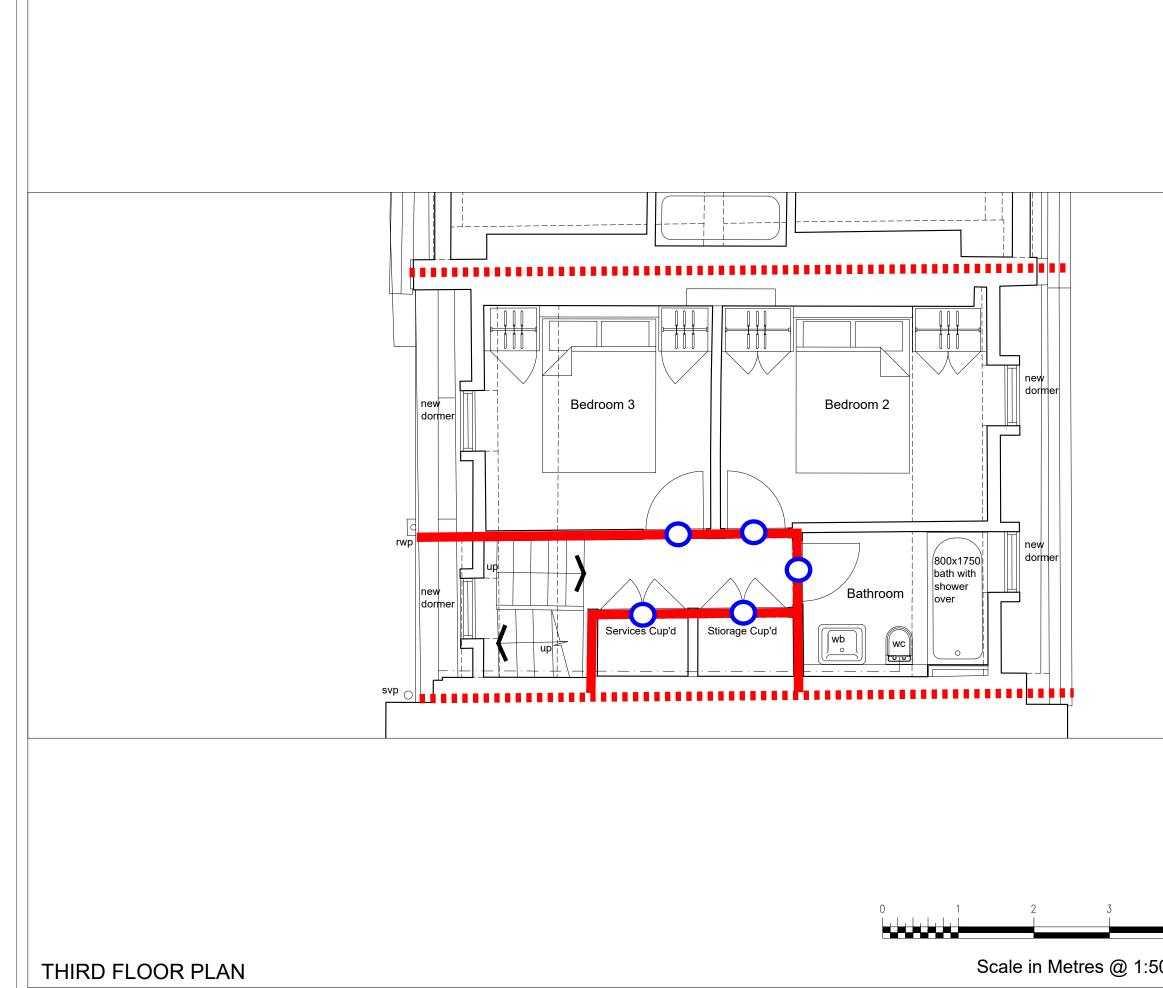
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