

Agnieszka Nowak-John
Planning Services (Bromley)
Civic Centre
Stockwell Close
Bromley
BR1 3UH

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

Date 29th February 2024
Our Ref 92/002791/FEG/AS
Your Ref 23/00178/FULL1

Dear Sir/Madam

RECORD OF CONSULTATION/ADVICE GIVEN

TOWN AND COUNTRY PLANNING ACT 1990

SCOPE OF WORKS: Phased development including demolition of existing buildings to facilitate a mixed-use development providing up to 250 dwellings, up to 2,828sqm of commercial/town centre floorspace and associated communal amenity space, play space, car parking, cycle parking, refuse storage and plant space in four buildings ranging between 3 and 18 storeys; alongside the provision of public realm and new pocket park with associated landscaping improvements (Re-consultation on the changes to the internal layout, modification to the ground floor refuse store and elevational changes of Block C, and updated relevant supporting information).

PREMISES ADDRESS: Blenheim Shopping Centre High Street Penge London SE20 8RW

DOCUMENTS REVIEWED:

- 'Blenheim Shopping Centre (Penge) Fire Strategy Report – RIBA Stage 2' (Design Fire Consultants Ltd, Rev 05, dated 29/11/23)
- 'Design Note DN 003.0 – Response to London Fire Brigade' (Design Fire Consultants Ltd, dated 20/10/23)

PLANS REVIEWED:

Site Plan 2049-FCB-ZZ-00-D-A-1000-Proposed Site Plan-Level 00 R03
Level M0 2049-FCB-ZZ-00M0-D-A-1001-Proposed Site Plan-Level M0 R03
Level L01 2049-FCB-ZZ-01-D-A-1002-Proposed Site Plan-Level 01 R03
Level M1 2049-FCB-ZZ-01M1-D-A-1003-Proposed Site Plan-Level M1 R03
Level L02 2049-FCB-ZZ-02-D-A-1004-Proposed Site Plan-Level 02 R03
Level L03 2049-FCB-ZZ-03-D-A-1005-Proposed Site Plan-Level 03 R03
Level L04 2049-FCB-ZZ-04-D-A-1006-Proposed Site Plan-Level 04 R03
Level L05 2049-FCB-ZZ-05-D-A-1007-Proposed Site Plan-Level 05 R03
Level L06 2049-FCB-ZZ-06-D-A-1008-Proposed Site Plan-Level 06 R03
Level L07 2049-FCB-ZZ-07-D-A-1009-Proposed Site Plan-Level 07 R03
Level L08 2049-FCB-ZZ-08-D-A-1010-Proposed Site Plan-Level 08 R03
Level L09 2049-FCB-ZZ-09-D-A-1011-Proposed Site Plan-Level 09 R03
Level L10 2049-FCB-ZZ-10-D-A-1012-Proposed Site Plan-Level 10 R03

Level L11 2049-FCB-ZZ-11-D-A-1013-Proposed Site Plan-Level 11 R03
Level L12 2049-FCB-ZZ-12-D-A-1014-Proposed Site Plan-Level 12 R03
Level L13 2049-FCB-ZZ-13-D-A-1015-Proposed Site Plan-Level 13 R03
Level L14 2049-FCB-ZZ-14-D-A-1016-Proposed Site Plan-Level 14 R03
Level L15 2049-FCB-ZZ-15-D-A-1017-Proposed Site Plan-Level 15 R03
Roof 2049-FCB-ZZ-RL-D-A-1020-Proposed Site Plan-Roof R03
Building A & F Elevations 2049-FCB-AF-ZZ-D-A-2810 R03
2049-FCB-BC-ZZ-D-A-2820-Proposed Building BC GA Elevation 01-R03
2049-FCB-DE-ZZ-D-A-2831-Proposed Building DE GA Elevation 02 and 04-R03

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

London Fire Brigade (LFB) has been consulted with regard to the above-mentioned premises and in response to the resubmission of this application makes the following comments/observations in relation to the comments originally addressed:

Fundamental concerns relating to single stair for Block A

1. We note that the updated design for the height of Block A has been reduced to below 18m however it is noted that the height of the building is identified at 17.7m and is reliant on a single staircase. We draw your attention to the announcements from government stating their expectation that multiple staircases will be required in residential buildings above 18m. Whilst we note that transitional arrangements will apply, it is the National Fire Chiefs Council (NFCC)'s position, as stated in the December 2022 NFCC 'Single Staircases Policy Position Statement' that all residential buildings over 18m or seven storeys in height should be provided with multiple staircases. We therefore do not see this as deferring to the spirit of the guidance used and doesn't ethically justify this decision.

Design teams and developers should also be planning for the new requirements under the Building Safety Act for in scope buildings once occupied, including the need to provide a safety case review. The design as currently proposed may have implications on those responsible for demonstrating the ongoing safety in the building.

Fundamental concerns relating to single stair for Blocks B, D & E

2. We note the addition of a secondary stair for Blocks B & D. It is noted that the design for two staircases serving all floors in these blocks is not satisfactory in relation to the relevant guidance used. It is noted that the proximity of all staircases do not provide a suitable secondary means of escape, as in all buildings escape to a second stair is either past an un-lobbied stair or through the lobby of the stair that is not being used. Whilst we appreciate the proposals include the provision of a second stair, we are of the opinion that occupants should be provided with an appropriate route to either escape stair without having to move through a lobby associated with one stairway to get to a lobby associated with another stairway
We note the clarification of the amenity areas in Blocks B, D E, and expect this to be included in

subsequent building control consultations.

Ensuring suitable means of escape for all occupants in open plan apartments

3. We await further information in subsequent building control consultations.

Evacuation lifts for Blocks A, B, C, D & E

4. Noted. Our original comment regarding the provision for an additional evacuation lift in each core remains to ensure safe evacuation for all persons in the event of a lift failure. We expect this to be clarified in more detail in subsequent building control consultations.

Access and facilities for the fire and rescue service for Blocks A, B, C, D & E

5. Noted. Our original comment regarding the provision for an additional firefighting lift in each core remains to ensure sufficient access for firefighters to all areas of the buildings in the event of a lift failure. We expect this to be clarified in more detail in subsequent building control consultations.

In addition to the responses above, further comments in relation to this application are:

Proposed vertical means of escape design in Block C

6. It is noted that the design for two staircases serving Block C is not satisfactory in relation to the relevant guidance used. It is noted that the proximity of all staircases do not provide a suitable secondary means of escape for any 'Adaptable' flats, as escape to a second stair is either past an un-lobbied stair or through the lobby of the stair that is not being used. Whilst we appreciate the proposals include the provision of a second stair, we are of the opinion that occupants should be provided with an appropriate route to either escape stair without having to move through a lobby associated with one stairway to get to a lobby associated with another stairway

Mechanical Ventilation

7. We note the decision to use mechanical ventilation as a justification the enclosed horizontal means of escape. We expect this to be justified by provided suitable CFD modelling documentation and a relevant 3rd party analysis in subsequent building control consultations.

Electric Vehicles

8. We note that the proposals include enclosed car parking areas and recommend that consideration is given in relation to electric vehicle (EV) charging units, together with the potential fire risk posed by their battery systems. The following should be considered, preferably as part of a Qualitative Design Review (QDR) and, following the recommendations given in BS 7974. This is not intended to be an exhaustive list of considerations:

- Whether the smoke ventilation provisions for car parks are sufficient to manage the products of combustion from a fire involving one or more EVs

- Whether AWFSS require enhancements beyond the minimum recommendations of the relevant standards
- Whether the fire resistance of elements of structure should be increased beyond the minimum recommendations of this code of practice
- Whether car parking spaces served by EVCUs should be located closer to the access points to the car park for the fire and rescue services and to any fire main outlets in order to assist firefighters in applying extinguishing media to the fire
- Whether there should be provision for the safe removal of any EV car that has been involved in a fire and may still pose a risk of reignition. If access to the space is only via a car lift, for example, this may not provide such suitable provision
- Whether the water supplies provided for the fire and rescue services should be enhanced beyond the minimum requirements of BS 9990 and other relevant standards, in particular with regard to the duration of water supply available
- Suitable protection to car park internal surfaces and drainage systems to facilitate post-fire clean-up and environmental protection

A means of isolating the power supply to EVCUs should be provided for the fire and rescue services in a suitable location associated with, but outside of, the fire resisting enclosure to any car park containing EVCUs. This should be at the main designated access point to the building or car park for the fire and rescue services. Signage should be provided to identify the power supply isolation controls, and this should state:

"FIREFIGHTERS ELECTRICAL ISOLATION SWITCH FOR CAR PARK ELECTRIC VEHICLE CHARGING UNITS"

The signage should conform to BS 5499-1.

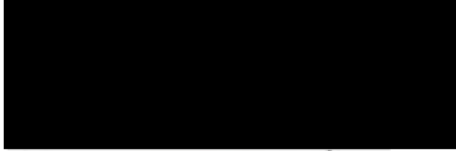
The location(s) of power supply isolation controls serving EVCUs should be indicated on premises information provided for firefighters. The power supply to all EVCUs should also be automatically isolated upon actuation of the fire warning and detection system or sprinkler system serving the car park in which they are located. EVCUs should be provided with a suitable level of water resistance to ensure that they do not pose a hazard to firefighters should they become immersed in water, either as a result of the activation of the sprinkler system or firefighting operations. It is our strong recommendation that car parks containing EVCUs should be provided with sprinkler coverage in accordance with BS 9251:2021 or BS EN 12845:2015+A1, irrespective of whether a building is otherwise provided with a sprinkler system.

Cycle Storage Area

9. The proposals include a cycle storage area. It is our opinion that consideration is given to the storage (and potential charging) of electric bikes and electric scooters and the potential fire risk posed by these electric powered personal vehicles (EPPV)s which may be located within these areas. There is increasing evidence showing that EPPVs can spontaneously ignite and burn for long periods so there is an increased potential for toxic gases/smoke/fire spread. It is therefore our recommendation that adequate automatic fire suppression and smoke control systems for the area are necessary. As such storage would be deemed an ancillary area, we are of the view that it should be provided with a ventilated lobby in accordance with the recommendations given in clause 32 of BS 9991:2015.


Any queries regarding this letter should be addressed to FSR-AdminSupport@london-fire.gov.uk. If you are dissatisfied in any way with the response given, please ask to speak to the Team Leader quoting our reference.

Yours faithfully,



Assistant Commissioner (Fire Safety)
Directorate of Operations



Reply to Inspecting officer 

E k

T 

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