

The South Molton Triangle

July 2022



GROSVENOR

Fire Safety Statement Addendum

HOARE LEA 



Fire safety statement for planning. South Molton Triangle.

1. Introduction.

This fire safety statement was originally prepared by Hoare Lea to accompany the planning application for the South Molton Triangle development in London and sets out a response to the London Plan (2021) Policy D12 (Fire Safety).

The intention of this fire safety statement is to address the main fire safety principles and provide an overview of the requirements and recommendations that the scheme will meet.

Following the previous successful planning application, this update to the fire safety statement has been produced to address the changes associated with the Section 73 Minor Material Amendment. Changes to this document have been highlighted in blue for ease of reference.

2. Proposed development.

Planning permission (ref. 20/03987/FULL) was granted on 8 April 2022 for development at South Molton Triangle and has subsequently been amended by a Non-Material Amendment (ref. 22/03379/NMA). The description of development for the consented scheme is as follows:

Part demolition, excavation (including beneath Davies Mews), erection of new buildings and alterations to existing buildings comprising: redevelopment of 60 Brook Street; redevelopment of 48, 50, 56 and 58 Brook Street and 16 Davies Mews behind retained Brook Street facades at; redevelopment behind retained and partially reconstructed facade at 52-54 Brook Street; refurbishment with alterations and addition of turret and gables at 40-46 Brook Street and 40 South Molton Lane; redevelopment behind retained Davies Mews and South Molton Lane elevations and front roof at 1-7 Davies Mews and 28-30 South Molton Lane; refurbishment and alterations at 50 Davies Street; refurbishment with alterations and partial demolition and redevelopment of upper floors at 52-54 Davies Street; redevelopment behind reconstructed and extended facade at 56 Davies Street (including the removal and reinstatement of certain building features), and Brookfield House (44-48 Davies Street and 62 and 64 Brook Street); part demolition of ground floor and refurbishment at 10 South Molton Street; refurbishment and alterations at 15-25, 27 and 42 South Molton Street; all to provide a development of up to 9 storeys including Class B1 (Business), Class A1 (Shops), Class A3 (Restaurant and Cafes), Class A4 (Drinking Establishment), composite use comprising public house and guest accommodation (sui generis), Class C3 (Dwellinghouses), Community Infrastructure and Facilities, and Class C1 (Hotel) uses, improvements to public realm and pedestrian routes, servicing, ancillary plant and storage, cycle parking and other associated works.

Six associated listed building consents were also granted on 8 April 2022: 20/03901/LBC for 52-54 Davies Street; 20/03902/LBC for 40-46 Brook Street; 20/03903/LBC for 1-7 Davies Mews; 20/03907/LBC for 10 South Molton Street; 20/03909/LBC for 15 South Molton Street; and 20/03910/LBC for 24 South Molton Street.

Following a design review, a number of amendments are proposed across the SMT scheme. These amendments have been discussed comprehensively with WCC Planning Officers through pre-application meetings. Details of the proposed changes can be found within the supporting Design and Access Statement. Specific amendments that require assessment within this report are discussed in more detail in this document, which will make clear the relevant amendment and the implications of it.

To seek approval for these amendments, a Minor-Material Amendment (Section 73) application has been submitted pursuant to the original planning permission (20/03987/FULL) as amended by NMA ref. 22/03379/NMA.

In parallel, six listed building consent applications have been submitted to reflect the changes proposed within the S73 application. These applications will provide alternative consents to the aforementioned listed building consent permissions granted on 8 April 2022.

This Fire Safety Statement supports the Section 73 application and provides an assessment of the proposed amendments sought. The description of the Section 73 application is as follows:

Variation of Conditions 1, 17, 20, 31, 39, 47, 49, 53, 54, 55, 56 and 57 pursuant to 20/03987/FULL (as amended) for: Part demolition, excavation (including beneath Davies Mews), erection of new buildings and alterations to existing buildings comprising: redevelopment of 60 Brook Street; redevelopment of 48, 50, 56 and 58 Brook Street and 16 Davies Mews behind retained Brook Street facades at; redevelopment behind retained and partially reconstructed facade at 52-54 Brook Street; refurbishment with alterations and addition of turret and gables at 40-46 Brook Street and 40 South Molton Lane; redevelopment behind retained Davies Mews and South Molton Lane elevations and front roof at 1-7 Davies Mews and 28-30 South Molton Lane; refurbishment and alterations at 50 Davies Street; refurbishment with alterations and partial demolition and redevelopment of upper floors at 52-54 Davies Street; redevelopment behind reconstructed and extended facade at 56 Davies Street (including the removal and reinstatement of certain building features), and Brookfield House (44-48 Davies Street and 62 and 64 Brook Street); part demolition of ground floor and refurbishment at 10 South Molton Street; refurbishment and alterations at 15-25, 27 and 42 South Molton Street; all to provide a development of up to 9 storeys including Class B1 (Business), Class A1 (Shops), Class A3 (Restaurant and Cafes), Class A4 (Drinking Establishment), composite use comprising public house and guest accommodation (sui generis), Class C3 (Dwellinghouses), Community Infrastructure and Facilities, and Class C1 (Hotel) uses, improvements to public realm and pedestrian routes, servicing, ancillary plant and storage, cycle parking and other associated works.

Refer to Figure 1 below for a location plan.

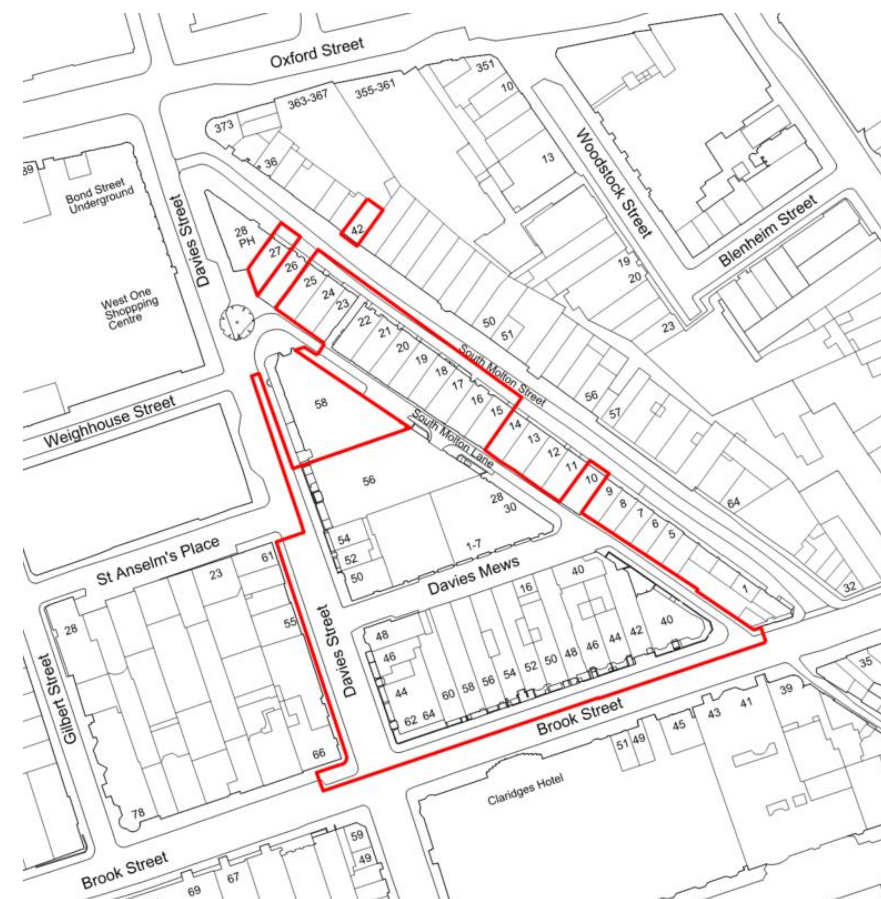


Figure 1. Location plan of the proposed development

2.1 Main office buildings (North and South Blocks)

A summary of the development is given below:

- The North Block is proposed as an office-led mixed-use building comprising of ten storeys (one basement level, Ground and First to Eighth Floor) with Level 8 being external terrace and plant only. The building height measured from Fire Service access level (i.e. Ground Floor) to the finished floor level of Level 8 is approximately 30.2m while the height from Fire Service access level to the topmost internal occupied floor (i.e. Level 7) is 26.5m.
- It is considered that the overall risk of Level 8 being slightly over 30m in height is not significant on the basis of the following:
 - Level 8 will have internal areas used only for plant and an occupied external roof terrace.
 - Level 7, the topmost internal (i.e. habitable) floor is still under 30m, approximately 26.5m.
 - There will be strict management procedures to limit ignition sources and combustibles within the terrace and open flame cooking will be strictly prohibited.
- The South Block is proposed as an office-led mixed-use building comprising ten storeys (two basement levels, Ground and First to Seventh Floor). The building height is approximately 27.3m from Fire Service access level (i.e. Ground Floor) to the topmost occupied floor level, i.e. Level 7.
- The existing Public House located at 50 Davies Street and the tenancies at 52 and 54 Davies Street will undergo internal and external alterations, refurbishment and reinstatement works as well as partial demolition to upper floors to 52-54 Davies Street behind street elevation. The Public House will expand into 52 and 54 Davies Street at Basement Level and into 52 Davies Street on Ground and First Floors. The Public House will comprise pub use at Basement, Ground Floor and First Floor with associated services at Basement while Second and Third Floors will comprise 6 guest rooms. 54 Davies Street will be incorporated into the office demise of the North block from Ground Floor to Fourth Floor while 52 Davies Street will be incorporated into the office demise of the North block from Second Floor to Fourth Floor.
- Two basement levels are proposed to be located under the footprint of the South Building while one basement level will be provided under the footprint of the North Building. Basement Level 1 will connect the two buildings.
- Both buildings, with the exclusion of 50-54 Davies St (as referenced above), are proposed to comprise of retail units, the office reception, entrance to the Community Infrastructure and Facilities space, waste store and food and beverage accommodation on the Ground Floor, while the upper floors will consist solely of office accommodation.
- Basement level 1, with the exclusion of 50 Davies St (as referenced above), will also contain retail and restaurant units (which are connected to Ground Floor via accommodation stairs), a cycle storage for the office occupants and Community Infrastructure and Facilities which will be provided with a separate entrance at ground floor. Basement level 2 will primarily comprise plant rooms.
- It should be noted that the previously approved planning submission included a corridor linking the Running Horse Public House with the North Building at Basement Level 1. This link has now been removed which is considered an improvement from a fire strategy point of view as it avoids linking these different building uses together. Specifically, the removal of the link is considered beneficial for the following main reasons:
 - To avoid directly linking the detection and alarm systems between the buildings with Cause and Effect implications (grey links can still be incorporated);
 - To avoid introducing sleeping risk accommodation to the North Building;
 - Linking the two building uses would have potentially required the commercial sprinkler system to be extended into the Public House which is very complicated given the existing building fabric; and
 - To avoid potential future complications related to façade material between sleeping accommodation and non-sleeping accommodation.

2.2 Hotel (40-46 Brook Street)

A summary of the development is given below:

- The existing building is currently used as office accommodation. The proposed development includes a material change of use for the building which applies to 40-46 Brook Street as the building will be used as a hotel, with restaurant and bar use included, where it was previously not.
- The hotel will comprise three blocks (i.e. the smaller stable block to the North, the townhouses on Brook Street and the central hotel block located between the two) which are connected at Basement and Ground Floor.
- The building has six floors (i.e. Basement, Ground Floor and First to Fourth Floors).
- The smaller stable block is less than 11.0m high, measured from the lowest adjacent ground level to the top habitable floor.
- The height of the top occupied floor of the townhouses block that front Brook Street (i.e. Fourth Floor) is approximately 14.3m, measured from the lowest adjacent ground level to the top habitable floor.
- The Basement and Ground Floor level are proposed to primarily comprise of bar and restaurant accommodation as well as back of house and plant areas. The upper storeys will comprise solely of guest rooms and suites.

2.3 Retail and residential units (10, 15-22, 23-25, 27 and 42 South Molton Street)

A summary of the development is given below:

- 10, 15-22, 23-25, 27 and 42 South Molton Street (SMS) is an existing row of buildings in London which will be refurbished as part of the South Molton Triangle scheme.
- There are currently two residential units on upper levels of SMS, however, the proposed development includes a material change of use as apart from these two units, all of the upper levels from 1st floor upwards of the buildings will be converted from office to residential tenancies.
- Units 10 and 15-21, 24 and 25 have five floors (i.e. Basement, Ground Floor and 1st to 3rd Floor) 22, 23 and 42 SMS have six floors, while 27 has seven floors. Refer to the table below for building heights.

Table 1: Heights of blocks.

Block	Number of Storeys (above ground)	Approximate height of top habitable storey (m)
10	3	10.7
15-17		
18	3	11.9
19-20	3	10.7
21	3	10.4
22	4	13.3
23	4	13.4
24-25	3	10.6
27	5	17.3
42	4	14.1

- The residential apartments are all designed based on a small single stair design where the apartments in each building will open directly into the single stair. As described above, several buildings are in excess of 11m and therefore a fire engineered solution has been proposed for 18, 22, 23, 24, 27 & 42 SMS. To justify this these apartments have been provided with several enhancements including sprinkler protection, LD1

detection, self-closing E30Sa fire doors to protected entrance halls within the apartments and a simultaneous evacuation strategy within the building. The topmost apartment in 18, 22, 23, 24 & 42 will be accessed from the second or third floor which is located below 11m with the higher levels accessed internally within the apartments only. This has been discussed and agreed in principle with the Approved Inspector

- Basement and Ground Floors generally comprise flexible retail/food & beverage use, with the exception of the basement of 15 and 16 SMS which contains a bar, while the upper floors are proposed to be converted to residential use.
- The access to the residential premises is completely separated to that of the retail premises located on Ground Floor and Basement [with the exception of a small shared lobby at Ground Floor of 17 SMS which is detailed further in Section 5.4.2](#). One unit (i.e. 42 SMS) contains a connection to a neighbouring premise (i.e. 43 SMS) which is an existing shared fire escape from the neighbouring building, this will not be used for day to day access and will be assessed in detail and afforded additional fire safety measures as appropriate during the next design stage.
- [42 SMS is also currently provided with an escape route into 43 SMS via the roof. This route appears only to act in one direction \(from 42 to 43 SMS\) and it is not proposed to utilise this escape route or the Level 3 escape route as part of the strategy for 42 SMS.](#)

3. London Plan Policy D12 (Fire Safety).

The Draft London Plan Policy D12 states that in the interests of fire safety and to ensure the safety of all building users, 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; and
 - 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, which all building users can have confidence in; and
6. Provide suitable access and equipment for firefighting which is appropriate for the size and use of the development.

All major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party suitably qualified assessor. The statement should detail how the development proposal will function in terms of:

1. The building's construction: methods, products and materials used, including manufacturers' details;
2. The means of escape for all building users: suitably designed stair cores, dignified escape for building users who are disabled or require level access, and the 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 site to enable fire appliances to gain access to the building; and

6. Ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures.

These items are detailed in the following sections for the South Molton Triangle development.

4. Competency statement.

All Hoare Lea design projects are headed by chartered engineers with proven experience on a wide range of fire safety consultancy projects. All work produced at Hoare Lea has been reviewed and approved by a senior chartered fire engineer.

Our staff have appropriate expertise and experience of fire safety design on a wide range of complex buildings, not only in the UK, but also world-wide. Whilst most of our work is conducted to satisfy safety regulations within the UK (e.g. Building Regulations and associated legislation), our staff have been responsible for developing fire safety strategies based on the NFPA standards and other international codes.

This statement has been produced, reviewed and approved by the following key individuals. The design and development of the fire safety strategy will be undertaken by the same individuals.

- Miller Hannah BEng (Hons), CEng, MIFireE – Director
- Johan Askman BSc, MSc, AIFireE – Associate

Furthermore, third party reviews will be undertaken by a different company to provide additional independent technical assurance.

5. Fire safety overview.

5.1 Main office buildings (North and South Blocks)

The key fire safety measures are listed in the sections below.

5.1.1 Building construction

- The exact construction method has not been defined at the time of writing this fire safety planning statement, but it will consist of traditional construction with parts of the original construction retained and/or reused.
- The buildings will be constructed in accordance with the applicable guidance documents in terms of materials and methods used.
- To limit the spread of fire within the buildings, all wall and ceiling linings will satisfy the appropriate classification stated within the applicable guidance document.
- The fire safety strategy will include a space separation analysis to establish the necessary boundary distance around each building. If required, certain areas of the façade will be provided with fire resisting construction.
- The buildings have a storey that exceeds 18m in height and, therefore, either the external walls should satisfy the performance criteria described in BRE report BR 135 or each element of the external wall build up, including any insulation product, filler material (not including gaskets, sealants or similar) etc. should be Class A2-s3, d2 or better (European Classification).

5.1.2 Means of escape provisions

- The office accommodation will operate a simultaneous evacuation strategy. That is, upon activation of the fire detection and alarm system, all occupants will evacuate immediately. The retail units (including restaurant, pub and education or training space) will all operate an independent simultaneous evacuation strategy.
- The direct travel distances should be within the recommended limits given below. The direct travel distances are used when the internal layout is not known and represent 2/3rds of the actual travel distances.
 - Office: 19.5m in a single direction and 50.6m when more than one direction is available;
 - Retail and plant rooms: 14.9m in a single direction and 37.9m when more than one direction is available.
- Each floor above ground in the main office buildings is currently provided with two 1100mm wide storey exits leading into a protected lobby which then leads into the fire-fighting lobby and stair.
- The buildings are currently provided with a single 1400mm wide stair serving all floors. The stair is provided with a 1.0m² AOV at the head and mechanically smoke ventilated access lobbies (i.e. firefighting lobbies).
- [The North and South Buildings will be provided with two firefighting lifts in each core, one of which will function as both a firefighting lift and an evacuation lift and will be provided with all features associated with an evacuation lift \(e.g. two-way communication device and the necessary controls\) in order to aid mobility impaired means of escape.](#)

5.1.3 Features incorporated to reduce the risk to life

- An L1 fire detection and alarm system designed and installed in accordance with BS 5839-1:2017 will be provided. This is an enhancement compared to the minimum recommendations.
- A commercial sprinkler system will be provided throughout the North and South blocks, designed and installed in accordance with BS EN 12845:2015. This is an enhancement compared to the minimum recommendations.
- The development will have trained management staff on site during hours of operation and a security presence overnight.
- The development will be provided with compartment floors throughout. This is an enhancement compared to the minimum recommendations.

- Mechanically smoke ventilated lobbies will be provided to the firefighting stairs as well as a 1.0m² Automatic Opening Vent (AOV) located at the head of the stair.
- Dry riser outlets will be provided on all floors including Ground Floor in the North and South blocks.
- Each member forming part of the structural frame of the North and South blocks or any other beam or column should be provided with 120 minutes fire resistance. This is an enhancement compared to the minimum recommendations.
- The stairs in the two North and South blocks will be enclosed in 120 minutes fire resisting construction.

5.1.4 Fire-fighting access within the buildings

- The fire-fighting access into the buildings will be via a fire-fighting shaft serving all floors.
- The fire-fighting shaft in each block will be provided with a fire-fighting stair, [two](#) fire-fighting lifts, a mechanically smoke ventilated lobby, an AOV at the head of the stair and a dry rising main.
- A commercial sprinkler system will be provided throughout the development, designed and installed in accordance with BS EN 12845:2015.

5.1.5 Fire-fighting access to the buildings

- Fire tender vehicle access will be provided within 18m of the fire-fighting entrance into each block and adjacent to the dry riser inlet point. The access route will meet the requirements for fire-fighting tender access.
- Hydrants will be provided within 90m of the dry riser inlet point serving the buildings.

5.2 Existing public house

The key fire safety measures for the existing Running Horse Public House located at 50 Davies Street are listed in the sections below.

5.2.1 Building construction

- The exact construction method has not been defined at the time of writing this fire safety planning statement, but it will consist of traditional construction with the majority of the original construction retained with potential changes and upgrades to the internal building construction.
- The alterations to the building will be constructed in accordance with the applicable guidance documents in terms of materials and methods used.
- To limit the spread of fire within the buildings, all wall and ceiling linings will satisfy the appropriate classification stated within the applicable guidance document.
- The fire safety strategy will include a space separation analysis to establish the necessary boundary distance around the building. If required, certain areas of the façade will be provided with fire resisting construction.
- The building does not have a storey that exceeds 18m in height and, therefore, either the external walls should satisfy the performance criteria described in BRE report BR 135 or the external wall surface should be in accordance with applicable guidance recommendations for surface spread of flame classification and cavity barriers.

5.2.2 Means of escape provisions

- It is proposed to operate a simultaneous evacuation strategy for the entire premises. That is, upon activation of the fire detection and alarm system, all occupants will leave the premises (i.e. both pub floors and guest room floors).
- The building is provided with a single protected means of escape stair serving [Basement and Ground to Third Floor which will be separated at Ground Floor level](#). The Basement will be provided with an alternative means of escape route from Basement Level via the Ground Floor accommodation.
- The protected means of escape stair will discharge directly to the outside. The passageway from the stair to the final exit should be at least as wide and provided with the same fire resistance as the stair which it serves (i.e. fire resistance and lobby protection).

- All guest rooms will be provided with a protected lobby between the room and the single stair.

5.2.3 Features incorporated to reduce the risk to life

- An L1 fire detection and alarm system designed and installed in accordance with BS 5839-1:2019 will be provided.
- The protected means of escape stair will be provided with protected lobbies.
- The stair will also be provided with a 1.0m² AOV at the head of the stair.
- The development will be provided with compartment floors between the pub use and the sleeping accommodation, with the stair forming a protected stair enclosure.
- Each member forming part of the structural frame of the building or any other beam or column should be provided with 60 minutes fire resistance.
- The protected means of escape stairs will be enclosed in 60 minutes fire resisting construction with 30 minutes fire resisting lobbies.

5.2.4 Fire-fighting access within the building

- Access for the Fire Service will be provided using perimeter vehicle access (as outlined in the next section). The building is provided with a protected route into the building which the Fire Service can utilise if required.
- A fire engineered smoke ventilation strategy, centred around natural smoke ventilation, may be required for the Basement and will be further detailed during the next design stage.

5.2.5 Fire-fighting access to the building

- As the building is less than 18m in height, it is possible to provide perimeter vehicle access to the building. In accordance with applicable guidance recommendations, 50% perimeter access should be provided for vehicle access for a high reach appliance.
- Hydrants will be provided within 90m of the buildings (100m if existing).

5.3 Hotel (40-46 Brook Street)

The different hotel blocks are shown in Figure 2 below. The key fire safety measures are listed in the following sections.

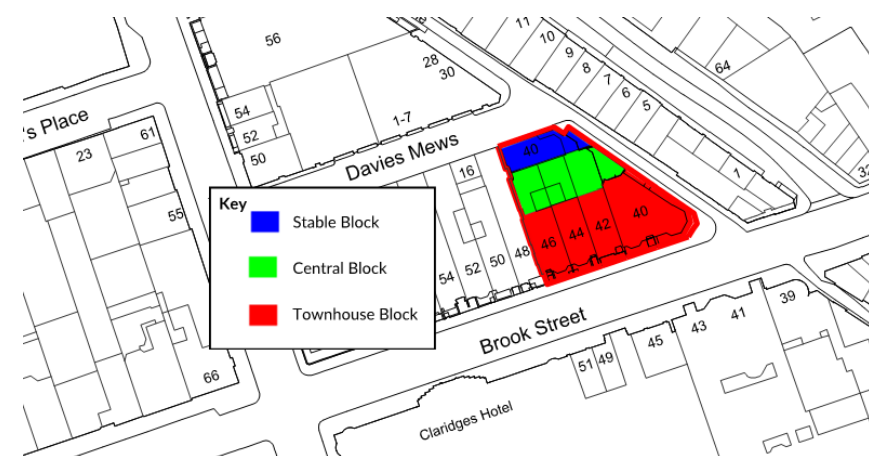


Figure 2: Layout plan of the sections of the hotel development.

5.3.1 Building construction

- The exact construction method has not been defined at the time of writing this fire safety planning statement, but it will consist of traditional construction with a significant part of the original construction retained.

- The building will be constructed in accordance with the applicable guidance documents in terms of materials and methods used.
- To limit the spread of fire within the buildings, all wall and ceiling linings will satisfy the appropriate classification stated within the applicable guidance document.
- The fire safety strategy will include a space separation analysis to establish the necessary boundary distance around each building. If required, certain areas of the façade will be provided with fire resisting construction.
- The building does not have a storey that exceeds 18m in height and, therefore, either the external walls should satisfy the performance criteria described in BRE report BR 135 or the external wall surface should be in accordance with applicable guidance recommendations for surface spread of flame classification and cavity barriers.

5.3.2 Means of escape provisions

- It is proposed to have two alarm zones: the hotel and the restaurant/bar demises. Detection of a fire in one of these zones will trigger the evacuation signal at the zone of fire origin and a silent alarm which notifies the building management in the other zone. This silent alarm will permit an investigation period (maximum of 6 minutes) before sounding the alarms in the entire building. A more comprehensive cause and effect assessment will be provided during the next design stage.
- The main hotel building is provided with three means of escape stairs each serving different parts of the building (i.e. three small single stair areas). The smaller stable block is accessed independently and will be provided with a single means of escape stair and adopt a residential evacuation approach including residential sprinklers.
- The stairs will discharge directly to the outside or via a protected passageway to the outside. The passageway from the stair to the final exit should be at least as wide and provided with the same fire resistance as the stair which it serves (i.e. fire resistance and lobby protection).
- All suites in the main hotel building will be provided with an alternative means of escape route from the bedrooms in order to prevent an inner room arrangement where the only means of escape route from the bedrooms is via the living space.
- Some of the means of escape provisions will require a fire engineered approach as the listed status of the existing building limits the amount of changes that can be made. These fire engineered approaches will be developed in detail during the next design stage.
- Generally, refuge spaces have been provided in the building in line with the recommendations in guidance. However, due to the listed nature of the building a fire engineered solution has been developed for the upper hotel levels of 40-46 Brook Street. This is considered reasonable on the basis of provision of specific evacuation aids which can accommodate the narrow stair width and based on a high level of management put in place to ensure staff are aware of occupants who may need assistance with evacuation. This strategy will be developed further at the next design stage.

5.3.3 Features incorporated to reduce the risk to life

- An L1 fire detection and alarm system designed and installed in accordance with BS 5839-1:2019 will be provided.
- Residential sprinkler protection will be provided to the smaller stable block which forms part of the hotel but is accessed independently. This area is to adopt a residential fire safety design and evacuation approach due to the proposed arrangements with suite type guest rooms.
- The stairs will be provided with protected ventilated lobbies at Basement.
- The building will have trained management staff on site 24/7.
- The development will be provided with compartment floors throughout.
- Each member forming part of the structural frame of the building or any other beam or column should be provided with 60 minutes fire resistance.
- The protected means of escape stairs will be enclosed in 60 minutes fire resisting construction.

5.3.4 Fire-fighting access within the building

- Access for the Fire Service will be provided using perimeter vehicle access (as outlined in the next section). The building is provided with multiple protected routes into the building which the Fire Service can utilise if required.
- A fire engineered smoke ventilation strategy, centred around natural smoke ventilation, is provided for the Basement and will be further detailed during the next design stage.

5.3.5 Fire-fighting access to the building

- As the building is less than 18m in height, it is possible to provide perimeter vehicle access to the building. In accordance with applicable guidance recommendations, 50% perimeter access should be provided for vehicle access for a high reach appliance.
- Brook Street will be provided for access with a high-reach appliance while Davies Mews and South Molton Lane will have suitable access for a pump appliance. This is considered reasonable as the provision of high-reach access to Brook Street will provide more than 50% of the perimeter access from the parts of the building more than 11m high. Therefore, the provision of access for a pump appliance only at Davies Mews and South Molton Lane is considered reasonable to provide vehicle access to the Stables Block, which is less than 11m in height.
- There is an existing fire hydrant at the corner of 34 Brook Street directly opposite from the bar entrance. This is within 100m of every access point to the hotel.

5.4 Retail and residential units (10, 15-25, 27 and 42 South Molton Street)

The key fire safety measures are listed in the sections below.

5.4.1 Building construction

- The exact construction method has not been defined at the time of writing this planning statement, but it will consist of traditional construction with the majority of the original construction retained.
- The building will be constructed in accordance with the applicable guidance documents in terms of materials and methods used.
- To limit the spread of fire within the buildings, all wall and ceiling linings will satisfy the appropriate classification stated within the applicable guidance document.
- The fire safety strategy will include a space separation analysis to establish the necessary boundary distance around each building. If required, certain areas of the façade will be provided with fire resisting construction.
- The buildings do not have a storey that exceeds 18m in height and, therefore, either the external walls should satisfy the performance criteria described in BRE report BR 135 or the external wall surface should be in accordance with applicable guidance recommendations for surface spread of flame classification and cavity barriers.

5.4.2 Means of escape provisions

- The residential premises will operate a simultaneous evacuation strategy on a building by building basis. This is not a common strategy for a residential building but has been proposed in this instance to support the fire engineered solutions within the building.
- On activation of the fire detection and alarm system, all occupants within the residential portion of each affected building will evacuate in the event of a fire. The retail units below will operate independent simultaneous evacuation strategies; that is on fire detection in a retail tenancy only that tenancy will evacuate. For the purposes of this document “building” refers to each number on SMS, so 15 SMS and 16 SMS would each form a separate building. The exception to this is for 19/20 SMS and 23/24 SMS which are connected internally via the residential stair. In these cases both 19 & 20 and 23 & 24 SMS will be considered each a single building respectively. For example, all apartments in 19 & 20 SMS should evacuate simultaneously, the same logic will apply to 23 & 24 SMS.
- The exception to the above strategy regarding separation between residential and retail accommodation is for 17 South Molton Street, where it is proposed to link the alarm within the retail tenancy with the

residential tenancy above, such that in the event of fire detection within the retail tenancy the alarm sounds throughout the residential levels as well due to the shared common entrance at Ground Floor.

- All apartments will be provided with a protected entrance hall and the multi-storey apartments will be provided with a protected internal stair.
- The apartments in each block are accessed via a protected single staircase. Each stair will discharge to the outside via a protected discharge route.
- The apartments will open directly into the single stair as per recommendations for small single stair buildings (each apartment provided with a protected entrance hall).
- The communal protected stairs will be provided with a 1.0m² AOV located as high as practically possible within the stair enclosure.
- The means of escape facilities for the residential premises will be completely separated from the retail premises at lower floor levels with the exception of 17 SMS. At 17 SMS, the residential levels (which consist of a single apartment) share a final escape route with the retail tenancy. Due to space constraints and heritage limitations on the shop frontage of 17 SMS it is not possible to provide a ventilated lobby or direct access to the street from the retail tenancy. 17 SMS is a listed building, and the shopfront is of historical interest. On this basis it was considered by the architectural team that creating a new door directly to external in the shop front would impact on the historical feel of the shop front and would be highly unlikely to be accepted by the heritage consultant. In lieu of this it is proposed to provide a 60-minute fire and smoke curtain located inside the retail unit over the door into the final exit route from the residential unit at 17 SMS. In addition, it is proposed to connect the alarm within the retail tenancy with the alarm in the residential tenancy.
- It is proposed to design all retail units except 15-16 SMS and 18-19 SMS in line with the recommendations in ADB volume 2 for small premises. A small premises should meet all of the following conditions:
 - It should be single occupancy.
 - It should not comprise more than a basement storey, ground storey and first storey.
 - No storey should have a floor area more than 280m
 - Any kitchen or other open cooking arrangements should be at the extremity of any dead end remote from the exits.
 - For a bar or restaurant, the seating or standing accommodation should be planned for a maximum of 30 people per storey. The seating or standing accommodation for the ground storey may be planned for 100 people if it has a final exit independent of the stair.
- The travel distances within the retail units should not exceed the limits given in Table 2 below.

Table 2: Travel distance limits in small premises

Storey	Maximum Travel Distance (m)	
	Direct	Actual
Ground with a single exit	18	27
Basement with a single stair	12	18
Storey with more than one exit/stair	30	45

- Further to the table above, an open stair in a small premise should not enter the Ground Floor more than 3m from the final exit.
- Some retail units exceed this maximum distance between stair and final exit and have been assessed in greater detail and provided with a fire engineered solution which has been discussed and agreed in principle with the Approving Authorities (AIS).

- Retail Unit 18-19 SMS is fire separated between ground and basement level with the basement provided with a protected escape route to external. The travel distances on both levels are within the recommended limits (18m for travel in a single direction, 45m where multiple directions are available).
- The bar located at 15-16 SMS has travel distance limitations of 18m in single direction and 45m where more than one direction exists. It is proposed that the basement bar is provided with direct access to the outside at ground level via protected stairs.

5.4.3 Features incorporated to reduce the risk to life

- An LD1 fire detection and alarm system designed and installed in accordance with BS 5839-6:2019 will be provided to the residential premises. An L2 fire detection and alarm system designed and installed in accordance with BS 5839-1:2017 will be provided to the retail premises.
- Sprinklers will be provided throughout (retail and residential tenancies) 18, 22, 23, 24, 27 and 42 SMS as these buildings are more than 11m in height and containing residential accommodation.
- As all retail tenancies are within a maximum compartment size of 100m², it is proposed to provide a mains fed Category 2 sprinkler system designed and installed in accordance with BS 9251:2021 which will be extended to serve all applicable retail units as well as the residential accommodation of the buildings in question.
- Pressure and flow tests from the mains supply have been undertaken to confirm that sufficient levels of pressure and flow is available. The sprinkler system will be designed and installed in accordance with BS 9251: 2021.
- The residential units will be provided with protected entrance halls (30 minutes fire resistance).
- The communal residential stairs will be provided with AOV's situated at high level of the top storey served.
- Compartment floors will be provided between different residential levels and between retail and residential.
- Any new elements of structure or compartment walls/floors that may be added will need to achieve 60 minutes fire resistance. This is provided that the depth of basement is less than 10m from ground level and that the height to the top floor is less than 18m from ground level.
- The residential stairs will be enclosed in 60 minutes fire resisting construction. The protected means of escape stairs in the retail premises will be enclosed in 30 minutes fire resisting construction.
- Smoke ventilation should be provided to basement retail units with a floor area above 200m² or a depth more than 3m below adjacent ground level. This will be provided via natural means.

5.4.4 Fire-fighting access within the building

- The buildings are below 18m and as such, no firefighting shafts are required. However, the buildings will be designed so that either a 45m hose laying distance is achieved from a fire vehicle to the furthest point in the buildings, or so that the fire vehicle access achieves the recommendations of guidance.

5.4.5 Fire-fighting access to the building

- Fire vehicle access will be provided to both South Molton Lane and South Molton Street with either hose laying distances or perimeter access achieving the recommendations of guidance as outlined in the section above.
- Hydrants will be provided within 90m of the buildings (100m if existing).

5.5 Construction, design and management regulations

Design projects undertaken in the UK are subject to the requirements of the Construction (Design and Management) Regulations 2015, the objective of which is to ensure that health and safety issues are properly considered during a project's design and development so that the risk of harm to those who have to construct, use and maintain the building is reduced.

As a designer, in accordance with Regulation 9 of the CDM regulations, Hoare Lea will take into account the general principles of prevention in the preparation of this report and where reasonably practicable, eliminate, minimise and/or control foreseeable hazards associated with the design. Where elimination is not reasonably

practicable, Hoare Lea will be required to provide 'pre-construction' information in respect of any significant and/or unusual project-specific hazards that remain.

5.6 Measures to protect the base build fire safety strategy

- Any future modifications to the scheme will be subject to Building Regulations approval and should consider the base build fire strategy, such that fire safety measures are not compromised within the development.
- The South Molton Triangle scheme will be a highly managed development and modifications to any passive or active fire protection measures implemented will not be allowed without consent of the building management.

6. Conclusion.

This fire safety statement has been prepared to outline the approach and provisions relating to fire safety for the South Molton Triangle development for compliance with the London Plan (2021) Policy D12.

This statement demonstrates that the proposals have considered fire safety at the earliest stage, and the further development of the fire strategy will be based upon these principles. The fire strategy will be further developed for submission to the Approving Authority at the appropriate time and will meet the functional requirements of the Building Regulations 2010, taking recommendations from the applicable guidance documents and the requirements of Policy D12 of the London Plan (2021) into consideration.

Regulation 38 of the Building Regulations requires that fire safety information be given to the person responsible for the occupied building. Therefore, copies of the fire safety strategy, once agreed with the Approving Authority, and other relevant fire safety information should be issued to the responsible person. This will ensure publication of the proposed evacuation strategy and assist in evacuation of all building users.

Any future modifications to the scheme will be subject to Building Regulations approval and should consider the base build fire strategy.



Miller Hannah BEng (Hons), CEng, MIFireE