

Highgate School Fire Planning Statement

Richards Music Centre

Highgate School

20 December 2022

Prepared for:

Highgate School

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1 Introduction

Highgate School has commissioned AECOM to provide fire strategy advice and to prepare a Fire Statement to accompany a planning application for the Richards Music Centre (RMC) where the existing building is to be demolished, and a new development will be built.

The proposed development is located in Highgate. The Site currently accommodates a number of existing school buildings. The Site is flanked east of Bishopswood Road. The school lies in the London Borough of Harringay.

All buildings in England and Wales are required to comply with the Building Regulations 2010. Building Regulations Compliance is decided by a Building Control Authority via a Building Regulations submission. The Proposed Development has been designed on the basis of adopting Building Bulletin 100: Design for fire Safety in Schools:2007 to demonstrate compliance with the performance requirements of the Building Regulations 2010 Part B (Fire Safety). Separate documentation in the form of a fire strategy will be prepared for a full Building Regulations submission after the design develops.

Major Developments within London are also required to comply with the London Plan over and above the requirements of the Building Regulations. The London Plan was published and has been officially enforced from 02 March 2021. AECOM understands that London Plan compliance is decided by the planning authority.

Policy D12 (Fire Safety) of the London Plan requires major developments to be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor. This Fire Statement has been prepared to fulfil this requirement.

The London Plan states buildings should be designed and built to accommodate robust emergency evacuation procedures for all building users, including those who require level access. All building users should be able to evacuate from a building with dignity and by as independent means as possible. Policy D5 (Inclusive Design) of the London Plan specifies that each stair core shall have an associated evacuation lift to fulfil the above. Commentary on D5 has been included within this Fire Statement, however, due to other planning constraints informed by the wider design team, Policy D5 has not been achieved in the proposed development. It is understood that text detailing this design decision prepared by Bidwell's can be found in the wider planning package.

This Fire Statement has been prepared using information included in a number of documents that are submitted with the planning application for the proposed development. The fire safety measures described herein have been developed in consultation with members of the design team and wider project team.

This statement outlines the fire safety strategy principles that have been developed for the Proposed Development. Some elements of the fire strategy will require further, detailed development and agreement with the 'Stakeholders', which includes the Building Control Authority, who will in turn consult with the Fire Brigade.

This document is not intended to function as a design document. This Fire Statement identifies the provisions to be made for the safety of occupants as well as the provision of suitable access and equipment for firefighting and the justification for these measures. How the proposed development will meet the intent of Policy D12 is detailed within Section 7. of this report. Signed declaration of compliance with Policy D12 of the London Plan, can be found within Section 4 of this report. **This excludes a signed declaration with Policy D5(B5).**

2 Fire Strategy Goals and Objectives

The fire engineering design process involves the development of fire safety solutions, that meet appropriate fire safety goals within the project constraints.

The overall objective for the development is to develop a fire safety solution which will continue, once further detailed design progression has occurred, to comply with relevant legislation and planning guidance, such as:

- The Building Regulations 2010, Schedule 1, Part B;
- Construction Design and Management Regulations 2015 (CDM)); and
- Regulatory Reform (Fire Safety) Order 2005 (FSO).
- The London Plan 2021 (namely D12 (Fire Safety) and Policy D5 (Inclusive Design))

The London Plan is supported by guidance, which provides further information about how the London Plan should be implemented. The design of the proposed development and this planning statement has utilised the London Plan supplementary guidance notes;

- London Plan Guidance Fire Safety Policy D12(A) Pre-consultation draft (March 2021)
- London Plan Draft Guidance Sheet Policy D12(B) Fire Statements (August 2020)
- London Plan Draft Guidance Sheet Policy D5(B5) Evacuation Lifts (August 2020)

3 London Plan

London Plan 2021 covers fire safety in Policy D12 (Parts A and B) and Inclusive Design in Policy D5; both are relevant to fire safety of the building and have been included in this Fire Statement.

3.1 Policy D12

Policy D12 A states: “In the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety and ensure that they:

1. Identify suitably positioned unobstructed outside space:
 - a. for fire appliances to be positioned on
 - b. appropriate for use as an evacuation assembly point
2. are designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire; including appropriate fire alarm systems and passive and active fire safety measures
3. are constructed in an appropriate way to minimise the risk of fire spread
4. provide suitable and convenient means of escape, and associated evacuation strategy for all building users
5. develop a robust strategy for evacuation which can be periodically updated and published, and which all building users can have confidence in
6. provide suitable access and equipment for firefighting which is appropriate for the size and use of the development.

Policy D12 B states: “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 fire safety under a number of headings.

AECOM have been informed by the planning consultant Bidwells that the works to be carried out on the proposed development constitute a “major development”, and therefore, a planning statement is required.

The London Plan refers to terms as; such as the “*highest standards of fire safety*”, “*suitably positioned unobstructed outside space*”, “*appropriate features*” and various other terms. In the absence of quantified guidance setting performance requirements in order to demonstrate compliance with these terms, it is our intention to demonstrate meeting the life safety requirement by following the guidance provided by BB100 – “Building Bulletin 100: Design for fire safety in schools”. This is on the basis that the levels of fire safety suggested therein meet those set out in the London Plan 2021.

3.2 Policy D5

Policy D5 B(5) states that development should “be designed to incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized for evacuation lift suitable to be used to evacuate people who require level access from the building”.

The building contains a lift and therefore evacuation lifts from each stair core should be provided. This has not been achieved for all stair cores within the development. It is understood that this design decision has been implemented by the design team and relates to the wider planning risks of installing evacuation lift shafts and increasing the overall building massing. As a result, the scheme does not fully comply with Policy D5 of the London Plan.

4 Declaration of Compliance

This Fire Statement evidences the provisions made for the safety of all occupants and suitable access and equipment for firefighting, including the justification for these measures. This report will, with the exception of Policy D5(B5), meet the checklist for a planning fire statement as outlined within the London Plan Draft Guidance Sheet Figure 1. This figure is detailed below.

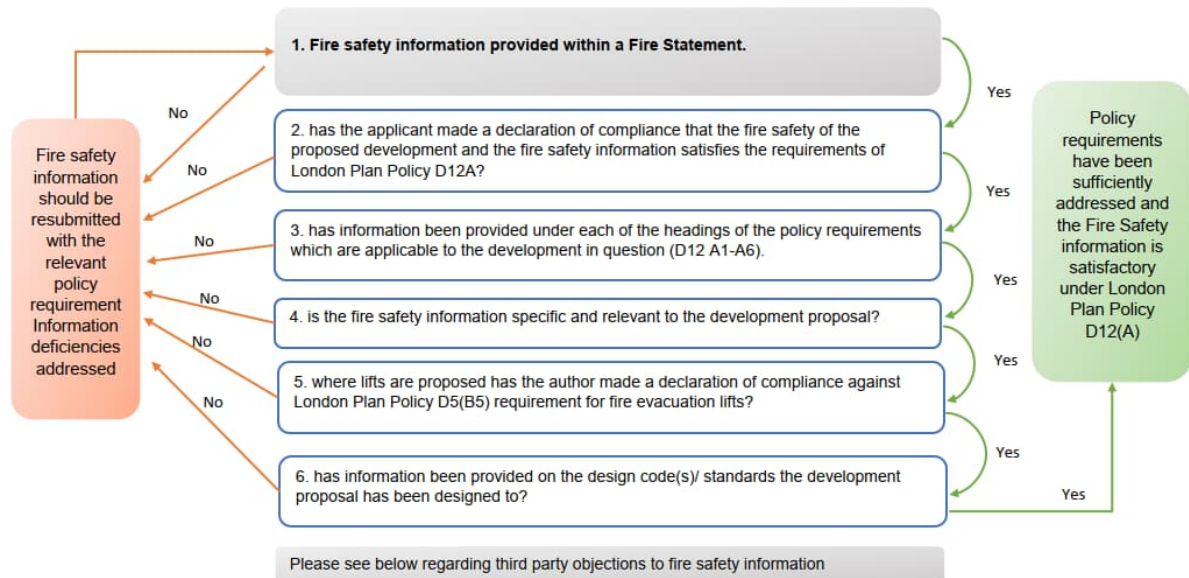


Figure 1: London plan policy D12(a) fire safety flow diagram

Guidance 3.12.9 within Policy D12 requires that the fire statement to be produced by a suitably qualified assessor, such as a Chartered Engineer registered with the Engineering Council by the Institution of Fire Engineers. The development of the fire safety statement for this project has been overseen by Simon Dent CEng, BEng, MIFireE.

(Please note the signed declaration below excludes declaring compliance with Policy D5(B5))

Name	Signature	Date
Simon Dent CEng, BEng, MIFireE.		20/12/2022

5 Building Description

A detailed building description of the development can be found in the wider planning application documents.

The Richards Music Centre (RMC) will be a new development. Redevelopment of RMC will include a complete demolition of existing structure and development of a replacement building with improved provision for emergency services, servicing and disabled parking.

The RMC Building comprises a single building with 1 upper level, a ground level and a basement level.

The height of the RMC, which has been used for prescribing the fire safety provisions, has been taken as the worst-case height from fire service access level to the topmost occupied storey for a given section of the building. For the RMC building, this is measured from access level (ground floor) to the finished floor level of the topmost occupied storey (Level 01) and is circa 3.35 m in height with a basement depth of circa 4.05 m. The largest floor area is 1044 m². The intended initial primary use of the development is a school teaching facility, including a drama theatre, classrooms, staff offices and associated ancillary accommodation.

The occupancy profile for the building as defined in BB100 is Assembly and Recreation.

The key fire safety features and challenges for the Development, include the following:

- Extended travel distances on the First floor
- Lack of step free egress provided for a mobility impaired person (MIP)

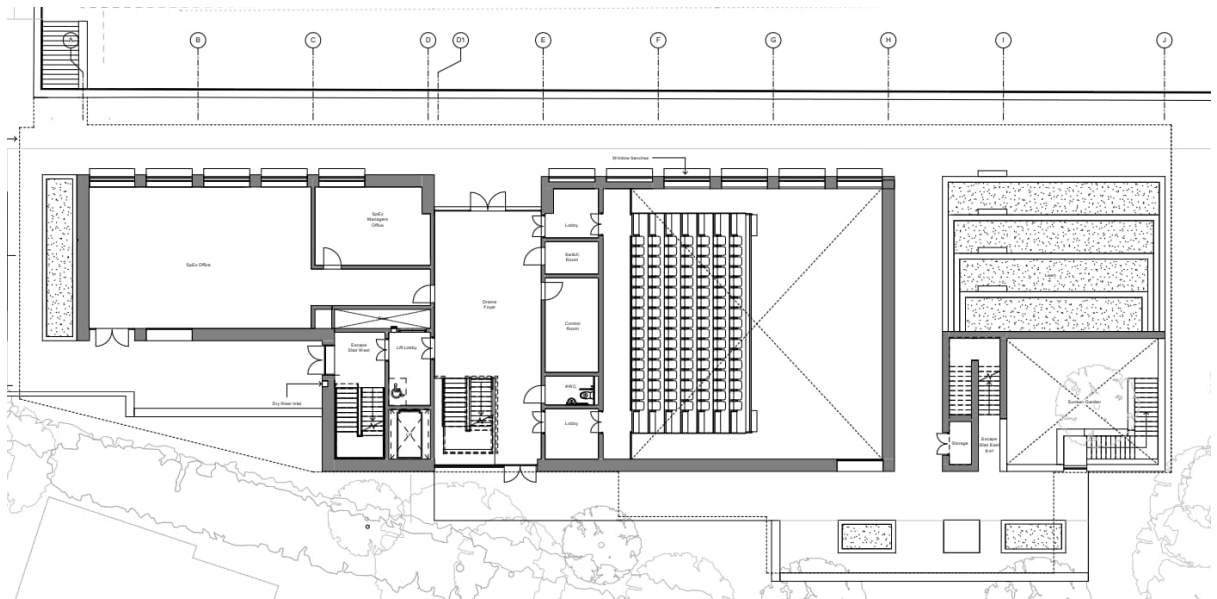


Figure 2: Building Overview- Ground Floor

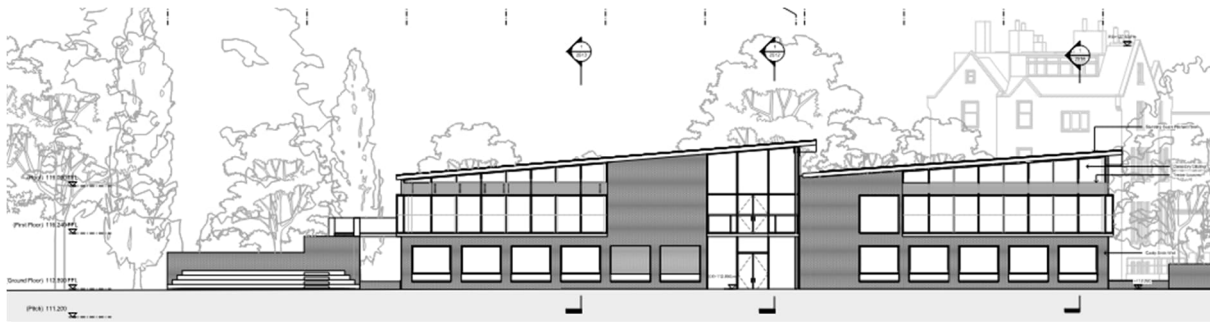


Figure 3: Building Overview- Elevation

6 Referenced Drawings and Information

This fire safety statement is based on information made available at the time of writing the report. The drawings used for reference during preparation of this statement can be found within the wider planning application.

7 Fire Safety Statement

The following section captures the London Plan fire safety requirements for the proposed development, addressing each item and detailing how compliance with the policies is met.

7.1 Building's construction (D12)

London Plan Policy which will be described in this section;

Policy D12 A (3) and Policy D12 B (1)

Is to be constructed in an appropriate way to minimise the risk of fire spread the building's construction: methods, products and materials used, including manufacturers' details.

London Plan Guidance Requirement;

"Under this heading, the Fire Statement should specify the construction method of the development and the measures that will be taken to limit any impact on the surrounding area. Construction methods that may impact on the fire safety provisions for neighbouring sites, buildings, occupants etc. must be identified and the risk reduced using suitable control measures. Building methodologies that pose a high risk of fire must also be identified within the Fire Statement with suitable control measures detailed.

Where possible, a prescriptive list of the products and materials planned for use during the construction of the asset/ development should be provided. As much information as possible should be provided e.g. planned use of timber for structural framework."

In terms of the fire strategy, the development will follow the design guidelines of BB 100.

All construction methods will be subject to the requirements of the Construction, Design, and Management Regulations (CDM).

It is not expected that the construction methods will impact on the fire safety provisions for neighbouring sites, buildings or occupants.

Further details of the materials to be used in the construction are detailed in the wider architecture planning proposal. It is not proposed to utilise combustible materials as part of the primary building construction.

No building methodologies that pose a high risk of fire when compared to traditional construction methods are proposed for the development.

7.2 Means of escape for all building users and evacuation strategy (D12)

London Plan policies which will be described in this section;

Policy D12 A(4)

Provide suitable and convenient means of escape, and associated evacuation strategy for all building users.

Policy D12 A(5)

Development of a robust strategy for evacuation which can be periodically updated and published, and which all building users can have confidence in.

Policy D12 B(2)

The means of escape for all building users including suitably designed stair cores, escape for building users who are disabled or require level access, and associated evacuation strategy approach.

Policy D12 A(1b)

Identification of suitably positioned unobstructed outside space: (b) appropriate for use as an evacuation assembly point.

London Plan Guidance Requirement;

“Applicants must demonstrate within the Fire Statement that the means of escape for all building users has been considered and planned into the scheme from the outset. Applicants should identify the code/s that the means of escape has been designed to and detail how they have not only been applied/ adhered to, but also how the proposals have sought to exceed those minimum standards. It is essential that all building users have been considered and planned for within the design of the means of escape and evacuation strategy.

There are a number of evacuation strategies/ approaches applicants could incorporate/ design around. Whichever strategy is incorporated, the applicant must ensure that the Fire Statement contains reasonable justification supporting the decision and reference the relevant code/standard that has led to that outcome. The strategy must make provision for everyone, including people who require level access, disabled people with a range of impairments (including mobility, sensory and cognitive impairments), and people who do not have a good understanding of English”

7.2.1 Evacuation Regime

In terms of the fire strategy, the development will follow the design guidelines of BB 100.

A Simultaneous Evacuation will be employed throughout the Proposed Development.

7.2.2 Travel Distance

The limits on travel distance from Table 1 BB100 will be followed in order to provide adequate means of escape within the required limits.

The theatre will have seating in rows and therefore will be limited to 15 m single direction and 32 m multiple directions.

Storerooms will be classified as places of special fire hazard and will be limited to 9 m single direction travel and 18 m multiple direction travel.

All other areas will be limited to 18 m single direction travel and 45 m multiple direction travel. The travel distances limits presented above will be met within the RMC building.

In the current design, there is an extended travel distance of 19.8m from the kitchenette on the First floor. Internal alternative means of egress will be included from this space as the design develops

7.2.3 Final Exits

The width of the final exits will be sufficient to cater for the maximum evacuation flow rate equal to or greater than that from the storey exit and stair combined.

Multiple final exits are provided within the RMC building and will be size according to expected maximum occupancies.

7.2.4 Stairs

All stairs used as a means of egress will be sized appropriately to ensure the expected maximum occupancies can be catered by the stair capacities provided.

The RMC building contains one protected internal escape stair, two external escape stairs and one internal accommodation stair.

7.2.5 Disabled Refuges & Evacuation Lifts

The central stair core will contain a dedicated evacuation lift and associated refuge.

Due to planning constraints the two external escape stairs will not be provided with a dedicated evacuation lift to allow step free dignified escape in accordance with D5 of the London Plan. However, refuges for assisted escape will be provided at all level changes.

The refuge will be a minimum of 900 mm x 1,400 mm with doors leading to the refuge of a width of not less than 850 mm. All refuges will be sited so that it does not obstruct people evacuating.

Refuge and evacuation lift locations for individual areas of the building are further described in Section 7.2.6.

7.2.6 Means of Escape from each storey

Means of escape from the separate levels of the building for all building users is described in the following sections.

7.2.6.1 Basement

There are three possible means of egress from the basement including:

- A northern stair final exit from the building leading to the adjacent synthetic pitch.
- A central protected shaft with a stair leading up to the ground floor.
- An external stair in the sunken garden leading up the ground level.

The northern stair, central stair and external stair will be protected and provided with a lobby and refuge points for MIPs. The central stair will be provided with an emergency evacuation lift.

Storey exits and provisions for MIP are shown in Figure 4.

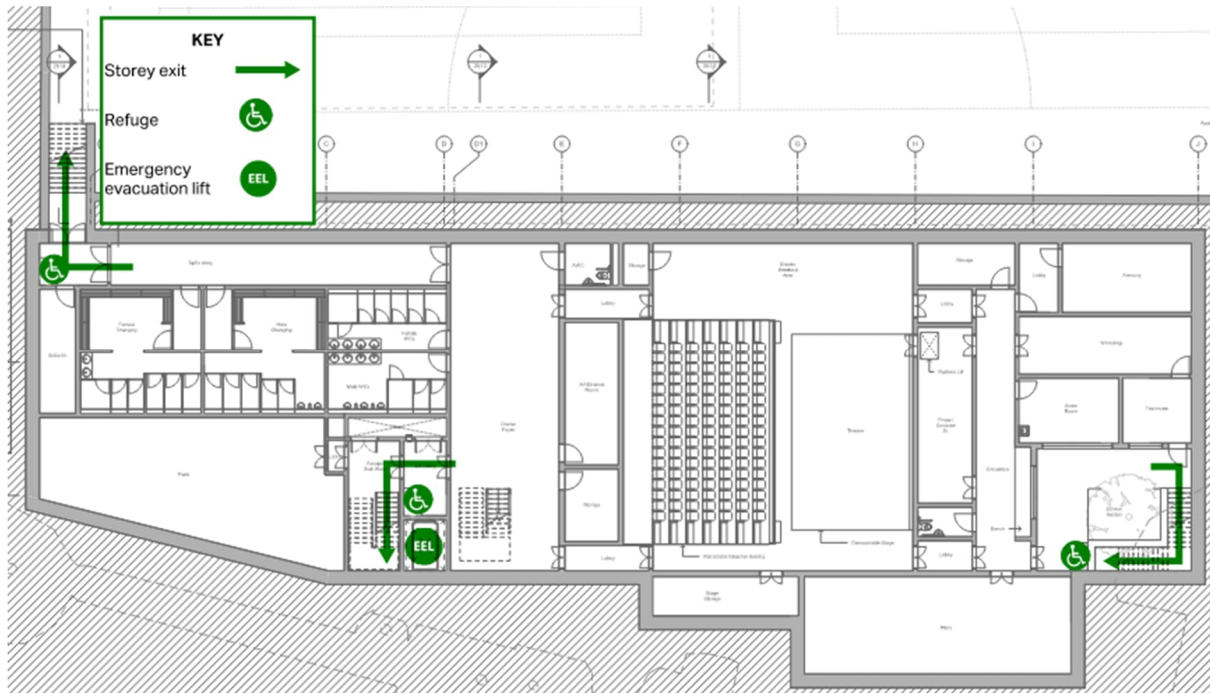


Figure 4: Basement Means of Escape

Management procedures and appropriate equipment will be required in the sunken garden stair to ensure occupants are able to be assisted up a flight of stairs.

7.2.6.2 Ground Floor

The ground floor has four final exits. One leads to outside directly from the protected stair, two share the drama foyer and another leads from the staff office.

All exits provided at ground floor will have step free egress up to the appropriate assembly point. Storey exits are shown in Figure 5.

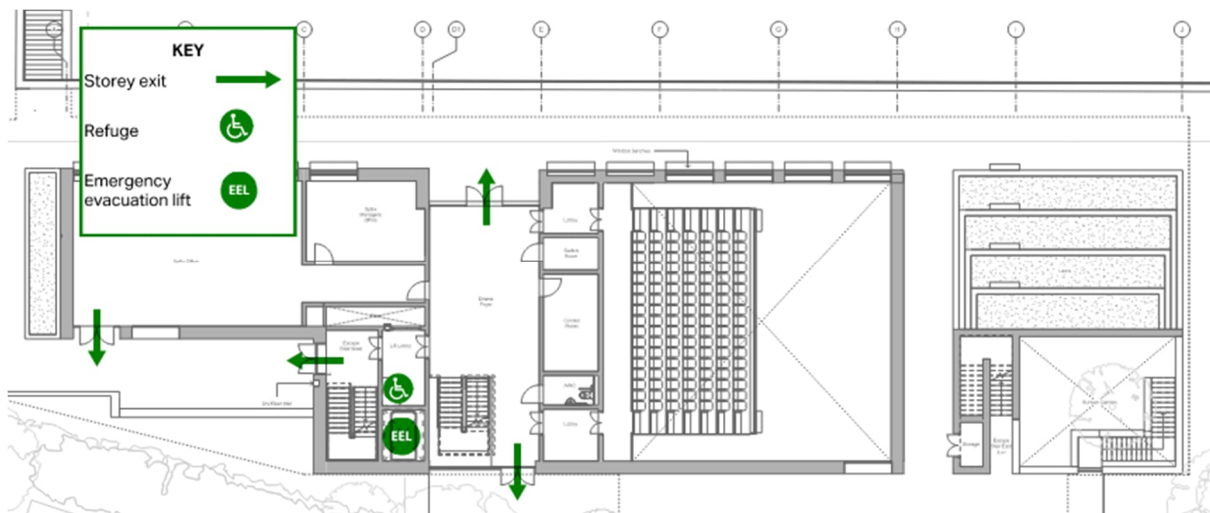


Figure 5: Ground Floor Means of Escape

7.2.6.3 First Floor

There are two possible means of egress from the First floor including:

- A central protected shaft with a stair leading up to the ground floor.
- An eastern external stair that leads down to ground level.

The central stair and external stair will be protected and provided with refuge points for MIP's. The central stair will be provided with an emergency evacuation lift.

Storey exits and provisions for MIP's are shown in Figure 6.

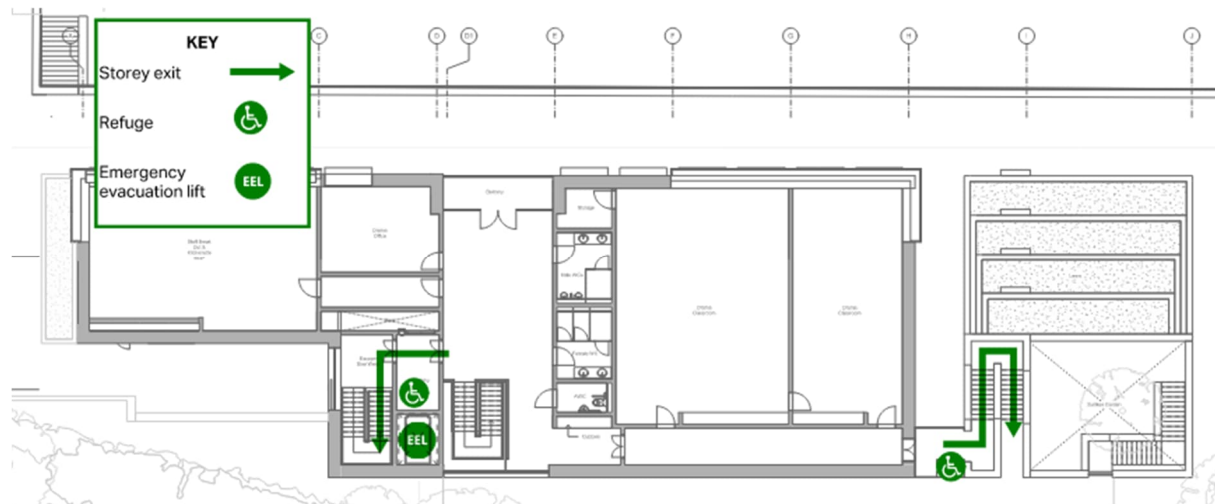


Figure 6: First Floor Means of Escape

7.3 Passive and Active Fire Safety Measures (D12)

London Plan policies which will be described in this section;

Policy D12 A(2)

Design of development proposals 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.

Policy D12 B(3)

Features which reduce the risk to life: fire alarm systems, passive and active fire safety measures and associated management and maintenance plans

London Plan Guidance Requirement;

“Applicants must demonstrate within the Fire Statement that provisions for passive and active fire safety measures have been considered at the earliest design stage. Again, applicants should identify the code/s that these measures have been designed to and demonstrate how the proposals have sought to exceed those minimum standards”

7.3.1 Fire detection and alarm system

In the event of a fire, it is essential that all occupants are made aware of the danger of an existing fire in order to facilitate evacuation.

Typically, BB100 recommends a Category M (manual) system to satisfy the Building Regulations and other statutory requirements for schools. However, there are other circumstances where the building should be provided with a suitable Category L (life safety) fire detection and alarm system in accordance with BS 5839-1, such as where the school is likely to be partially occupied outside school hours (L4 detection system recommended) and where the fire could break out in an unoccupied area (e.g. storage) (L2 detection system recommended).

A Category L2 detection system is proposed, providing an enhanced standard of detection throughout the building when compared to minimum code recommendation.

Manual Call Points (MCP) are to be provided at storey exits, final exits and places of high hazard.

Visual alarms in accordance with 5588-8 will be considered in the studio theatre where occupants are likely to be unable to hear alarms.

7.3.2 External fire spread

It is intended that emergency signage and lighting will be provided to facilitate evacuation for all building occupants. Emergency lighting will be provided in line with the recommendations of BS 5266-7. Emergency signage will be provided in line with the recommendations of BS 5499-4 and BS ISO 3864-1.

7.3.3 Linings

It is proposed that all linings for walls and ceilings shall meet the following classifications as defined in Table 7 BB100.

7.3.4 Backup power

All life safety systems shall be provided with dual power supply in accordance with the BB100 recommendations and the standards to which they refer. This can be a second generated supply or a diverse supply via alternative routes.

7.3.5 Structural fire resistance

In accordance with BB100 all elements of structure shall achieve 60 minutes (R).

7.3.6 Compartmentation

Appropriate compartmentation shall be provided to appropriately protected means of egress and to enclose places of special fire hazard from the rest of the building. The floor between the basement and Ground Floor should be a compartment floor achieving 60 minutes (R).

7.3.7 Fire Stopping

Penetrations through lines of fire resisting construction, for example for services, should be appropriately fire stopped to maintain the fire resistance of the construction through which they pass. Junctions between external walls with compartment floors and walls should have appropriate detailing to maintain fire separation at these interfaces.

7.3.8 Cavity barriers

Cavity barriers will be implemented where necessary and will comply with the guidance provided in Section 6.4.2 of BB100.

7.3.9 Sprinklers

No automatic water suppression system is proposed within the development

7.3.10 External Fire Spread

The distance between the southernmost façade of the RMC and the existing site boundary is approximately 3.8 m. On the assumption that the relevant boundary exists on the site boundary, the southernmost façade of the RMC should have a percent protected area of circa 65 %.

7.3.11 Systems Maintenance and Management

A fire safety management plan will then be developed by the responsible person to incorporate these requirements and demonstrate compliance with the Regulatory Reform (Fire Safety) Order 2005.

All maintenance shall be in accordance with manufacturer's recommendations. The following fire safety systems will require maintenance (it is noted that this list is not exhaustive):

- a) Emergency lighting;
- b) Detection and alarm system;
- c) Evacuation lifts;
- d) EVCs and evacuation chairs;
- e) Fire/Fire and Smoke Dampers;
- f) Door hold-open devices; and
- g) Fire extinguishers.

Passive fire precautions, such as doors and their seals and signage will also require inspection and maintenance. External means of egress such as external stairs should be maintained clear of ice and snow. The fire safety manager for the building will have the responsibility for ensuring a maintenance regime is implemented.

7.4 Access for fire service personnel and equipment & Fire suppression systems (D12)

London Plan policy which will be described in this section:

Policy D12 B(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.

London Plan Guidance Requirement;

“Any and all provisions for active measures that have been designed into the development proposal for use by the fire and rescue service must be clearly identified within the Fire Statement. Requirement B5 of Approved Document B (volumes 1 and 2) provides a means of compliance against the functional requirements of the Building Regulations 2010 for such measures.

Development proposals may readily opt to defer to the provisions made within Approved Document B as a minimum standard, however excerpts taken from Approved Document B without specific context and references to the development proposal do not demonstrate compliance with this policy

Contained within the Fire Statement should also be an outline management plan for the ongoing maintenance of these provisions”

7.4.1 Water Supplies

External hydrants shall be located within 90 m of the vehicle location points and not more than 90 m apart. It is assumed that existing hydrants in the public highway are sufficient in terms of location and flows as demonstrated in Figure 7 but will be checked.

7.4.2 Systems

A fire alarm panel shall be provided at the main fire brigade access point located to the South of the RMC Building.

7.4.3 Suppression

Fire Extinguishers shall be provided in accordance with the recommendations of BB100 and BS 5306-8.

No automatic water suppression system is proposed within the development.

7.4.4 Fire Mains

A dry fire mains is to be installed within the RMC development. A dry mains outlet should be installed within the protected central core at every level so that all areas of the building are with 45m of the outlet.

7.5 Provisions to enable fire appliance access to the building (D12)

London Plan policies which will be described in this section;

Policy D12 A(1a)

*Identification of suitably positioned unobstructed outside space:
(b) for fire appliances to be positioned on.*

Policy D12 A(6)

Provision of suitable access and equipment for firefighting which is appropriate for the size and use of the development.

Policy D12 B(5)

How provision will be made within the curtilage of the site to enable fire appliances to gain access to the building

London Plan Guidance Requirement;

“Any and all provisions for active measures that have been designed into the development proposal for use by the fire and rescue service must be clearly identified within the Fire Statement. Requirement B5 of Approved Document B (Volumes 1 and 2) provides a means of compliance against the functional requirements of the Building Regulations 2010 for such measures.

Development proposals may readily opt to defer to the provisions made within Approved Document B as a minimum standard, however they should be specific and relevant to the development in question.

The Fire Statement should clearly demonstrate how the above provisions do not adversely impact on neighbouring sites and access to the surrounding areas”

7.5.1 Fire Brigade Access

The location of the fire brigade vehicle access to the building should be agreed with all relevant authorities as the design develops. The access has been developed in accordance with the recommendations of BB100.

Fire brigade access routes are provided by Bishopswood Road, to the west side of the building, respectively. This is shown in Figure 7.

As the building's total floor area is between 2000-8000 m² and less than 11 m to the top occupied storey. Vehicle access should be provided to 15 % of the perimeter as a minimum. As this is not achieved in the proposed development, dry fire mains are to be installed.

Fire main inlets should be located so that there is access for a pumping appliance to within 18m. They should also be visible from the appliance.

The development of this building does not adversely impact on neighbouring sites and access to the surrounding areas.

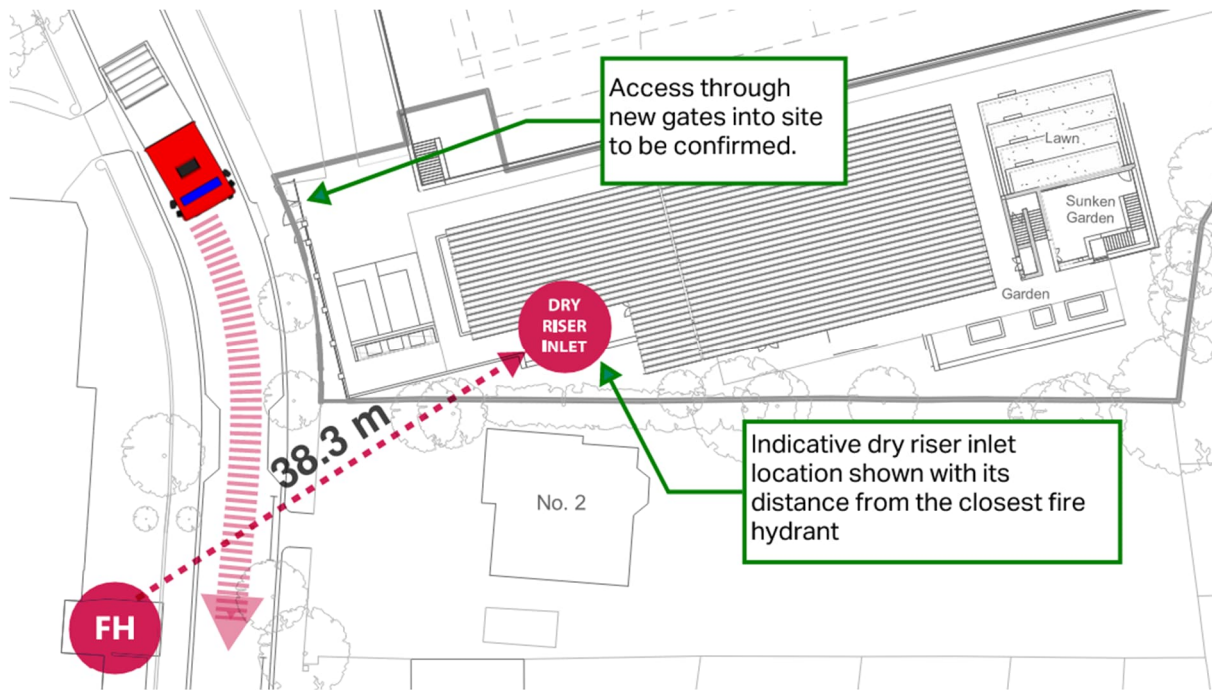


Figure 7: Fire Brigade Access Points and Hydrant Locations

7.6 Future modifications (D12)

London Plan policy which is described in this section;

Policy D12 B(6)

Future modifications will take into account and not compromise the base build fire safety/protection measure

London Plan Guidance Requirement;

“To ensure the highest standards of fire safety are considered throughout the lifecycle of the proposed asset, London Plan Policy D12(B) part 6 requires applicants to consider how, if the proposed asset was to be redeveloped in the future, the fire strategy and the protective measures within the asset would not be compromised. This may be presented in the form of a professional statement from the author identifying the constituent elements of the building that, if modified, may adversely affect the original fire safety strategy.

The fire safety information produced within the Fire Statement should be presented and managed in such a way as to consider the evolution of the development and the principles of the golden thread concept

It is anticipated that the information from the Fire Statement will be used to inform the overall fire strategy for the development. When adopting information from the Fire Statement into the fire strategy, consideration should be given to the accuracy and relevance of the information to ensure the build is as per the design. A handover process for the passing of all relevant fire safety information contained within the fire strategy to the building owner should be planned³ and, where possible, outlined within the Fire Statement.”

This Fire Statement has been drafted to demonstrate compliance with the London Plan in terms of providing appropriate level of fire safety given the characteristics of this building (i.e. use, height, anticipated number of occupants, evacuation strategy, etc.) Therefore, the fire safety approach provided in this report cannot be relied upon should changes to these (and other pertinent) characteristics are made in the future. As required by Regulation 38(2) of the Building Regulations, evidence of suitable provision to maintain the fire precautions, regimes, and systems in support of the fire strategy is required. A Regulation 38 file is to be prepared for the Proposed Development and issued to the responsible person at handover. It is expected that appropriately competent individuals follow the operational and maintenance requirements set out in the documents in the file.

The impact of a proposed change to any of the building's characteristics will need to be assessed in terms of the impact it might have on life safety prior to implementation. The person carrying out such an assessment should be appropriately competent for the change proposed and may require consultation with other parties, including Planning, Building Control, Fire Service and/or others. Typical changes which will require professional input include, but are not limited to:

- Further extensions to the building or surrounding building;
- Changes in internal partition layouts which may impact means of egress and compartmentation;
- Future change in building height; and
- Further developments on the neighbouring Parade Ground which may impact tender access.

7.7 Dignified Emergency Evacuation D5 (B5)

London Plan policy which is described in this section;

Policy D5 (B5)

In all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building

Step free egress has been provided in the central escape stair via an evacuation lift.

It is understood that the remaining two stepped escape routes are not provided with evacuation lifts due to wider planning constraints. These areas will be provided with disabled egress in line with Building Regulations however will not meet the requirements of Policy D5.

The wider planning/design team have agreed that the inclusion of additional evacuation lifts poses a significant planning risk and therefore they have not been provided in the scheme. It is understood that text detailing this design decision, prepared by Bidwell's can be found in the wider planning package.

8 Conclusion

This statement outlines the fire safety strategy principles for the Proposed Development.

This statement details how the Proposed Development meets the requirements of the London Plan Policy D12 and includes a signed declaration from a competent person confirming its compliance with the Policy D12.

This statement also notes that the Proposed Development does not comply with Police D5 of the London Plan which has been excluded from the declaration of compliance.

Some elements of the fire strategy will require further, detailed development and agreement with the 'Stakeholders' as the design progresses. This will include consultation with the Building Control Authority, who will in turn consult with the Fire Brigade.

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