# Alexandra Palace – Panorama Building, Reasonable Exception Statement

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| **Project** | **Alexandra Palace – Panorama Building** |
| **Subject** | **Reasonable Exception Statement** |
| **Date** | **14/10/2026** |
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| **Reviewed** | **Andrew Nicholson, Director** |
| **Project no.** | **P26-133** |

THE FIRE SURGERY

## 1 Introduction

The Fire Surgery have been commissioned to provide Fire Engineering support to the proposed redevelopment of the Panorama Building at Alexandra Palace, London.

Alexandra Palace first opened in 1873 as a private commercial venture to provide a 'People's Palace' for public entertainment and recreation, a concept that followed on from the success of the Great Exhibition of 1851 and the development of Crystal Palace in 1865. Now located within a Conservation Area, the Grade II Listed Palace (with a footprint of approximately 7.5 acres) sits within a 196-acre Park.

Both Palace and Park have both been modified significantly since it first opened in 1873, with the Palace experiencing significant modification and rebuilding as a result of two major fires - firstly in 1873 within two weeks of its opening, and again in 1980. Because of its history, around 40% of the original footprint of the Palace has either been destroyed or is not accessible to the public.

The 60% of the Palace that is currently accessible is used for a range of live entertainment events, including concerts, exhibitions and sporting events, as well as weddings, banquets and conferences. Other onsite attractions include a national-sized ice rink, popular with community groups, sporting clubs and the public, a boating lake, and a pub/bistro.

The Palace building consisting of seven main adjoined buildings, including the Panorama Building, and occupies a footprint of ca. 30,500m$^2$. The Panorama Building is a single storey building which is used for various events as an assembly building and occupies a footprint of ca. 1460m$^2$ within the Palace footprint.

The proposed works to the Panorama Building consist of full redevelopment of the existing structure. The proposed works are to provide a new double height single storey structure within the existing footprint of the Panorama Building.

# Alexandra Palace – Panorama Building, Reasonable Exception Statement

This Reasonable Exception Statement aims to outline the reasons why the London Plan (Fire Safety) Policy D12(A) does not apply to the limited redevelopment works at Alexandra Palace, limited to the footprint of the Panorama Building.

## 2 Competency Statement

Paragraph 3.12.9 of Policy D12 explains that Fire Statements, or Reasonable Exceptions Statements, should be produced by someone who is: “third-party independent and suitably qualified”. The Fire Surgery competence along with the fire engineers working on the scheme is provided below.

The Fire Surgery is an award-winning independent Fire Engineering design consultancy based in London. The company is a proud member of the Fire Engineering Council for the Fire Industry Association by virtue of the Chartered Engineering status of its engineers and also its ISO 9001 accreditation for Quality Management.

The specialist fire and risk consultancy team come from a varied background including mathematicians, a Chartered physicist, 5 Chartered Fire Engineers and a management consultant who specialises in business continuity. Members of the Fire Surgery team also contribute regularly to the development and writing of fire safety standards and industry best practice guidance, including *BS7974; Application of fire safety engineering principles to the design of buildings – Code of practice (2019)*, in which competency plays a fundamental part.

The Fire Surgery has a proven track record for securing Building Regulations approvals on a number of new office buildings, assembly buildings and buildings of Heritage, having a strong working relationship with Local Authority Building Control and London Fire Brigade Fire Engineering Team.

Recently completed listed/ heritage building fire strategies include:

- 39 Brook Street (Project Shields), Mayfair, London.
- 88-89 Mount Street (George Club), London.
- The Old Vic Theatre, London.
- St Pauls Cathedral, London.
- St George’s Guildhall, Kings Lynn.
- The Hurlingham Club, London.
- Bruce Castle Museum, London.

### 2.1 The Fire Engineers

**Andrew Nicholson** BEng (Hons), MSc (Cantab), CEng, MIFireE is the founder and Director of The Fire Surgery. He is a Chartered Fire Engineer with 26 years’ experience with Fire Engineering design. He

has a specialist fire engineering degree from the University of Leeds and a Master's degree in interdisciplinary design from the University of Cambridge.

Andrew is a contributing author to the Fire Protection Association publication – Fire Risk Management in Heritage Buildings. He is also a standing committee member of the Association of British Theatre Technicians. He was invited onto the Special Interest Group by the Institution of Fire Engineers on Heritage Fire safety. He was a principal author of BS 9999 2008 and also sits on numerous British Standard committees including BS7974. He is a steering committee member of CIBSE Guide E Fire Engineering and was joint author of section 13 Fire Fighting Access.

Andrew Nicholson is the Project Director for The Hurlingham Club and oversees and approves the fire safety design principles.

**Marshall Nyamuchiwa,** MEng (Hons), AIFireE, graduated from the University of Birmingham (2017) with a master's degree in chemical engineering and immediately started his career in the fire safety sector. He is registered as an Associate with the Institution of Fire Engineers (IFE) and is working towards Chartership status.

Marshall has a wide range of experience within the fire safety industry consisting of conducting passive compartmentation and fire door surveys, developing holistic fire strategies, supporting design fire strategy principles during construction, and conducting computational fluid dynamic (CFD) fire and smoke modelling to support fire engineered solutions. He has been working as a lead engineer on live projects consisting mainly of refurbished and new build commercial buildings and on listed buildings of heritage interest.

## 3 London Plan Fire Safety Policy D12(A)

According to the London Plan Fire Safety Policy D12(A), applicants for all development proposals should submit a Planning Fire Safety Strategy (PFSS) to ensure the highest standards of fire safety. However, the applicant considers that the policy is not applicable for these proposed works, and so this Reasonable Exception Statement (RES) has been prepared as justification.

This Reasonable Exception Statement was based on consideration of the Policy Criteria as outlined in Table 1 below.

*Table 1: London Plan Policy D12(A) – Policy Criteria*

| Criteria | Description | Fire engineer comments |
|---|---|---|
| 1 | Identify suitably positioned unobstructed outside space for fire appliances and evacuation assembly point. | Outlined in section 4.1 below. |
| 2 | 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. | Outlined in section 4.2 below. |
| 3 | Constructed in an appropriate way to minimise the risk of fire spread. | Outlined in section 4.3 below. |
| 4 | Provide suitable and convenient means of escape, and associated evacuation strategy for all building users. | Outlined in section 4.4 below. |
| 5 | Develop a robust strategy for evacuation which can be periodically updated and published, and which all building users can have confidence in. | Outlined in section 4.4 below. |
| 6 | Provide suitable access and equipment for firefighting which is appropriate for the size and use of the development. | Outlined in section 4.5 below. |

# 4 Reasonable Exception Statement for Policy Criteria

## 4.1 Criterion 1: Information on space provision for fire appliance and assembly points

Alexandra Palace is located within the Alexandra Park Conservation Area, an area of approximately 196 acres. Access to the wider site is available through Alexandra Palace Way, an access route that extends from the South (from Muswell Hill) to the North (Bedford Road). Alexandra Palace Way allows access to the Palace building mainly to the South-East side, with secondary access routes providing access to the South-West and North-East sides of the Palace building (see Figure 1 below).

Fire and rescue access to the Panorama Building will be through the secondary access route to the South-West side of the wider building. The are multiple exit routes around the perimeter of the Palace building therefore the presence of a fire appliance to this South-West side will not adversely affect egress from the wider building.

The Palace building is surrounded by extensive courtyards/ Alexandra Park areas. These courtyards/ park areas have adequate space and separation from the building to be used as assembly points for all occupants from the Palace building.

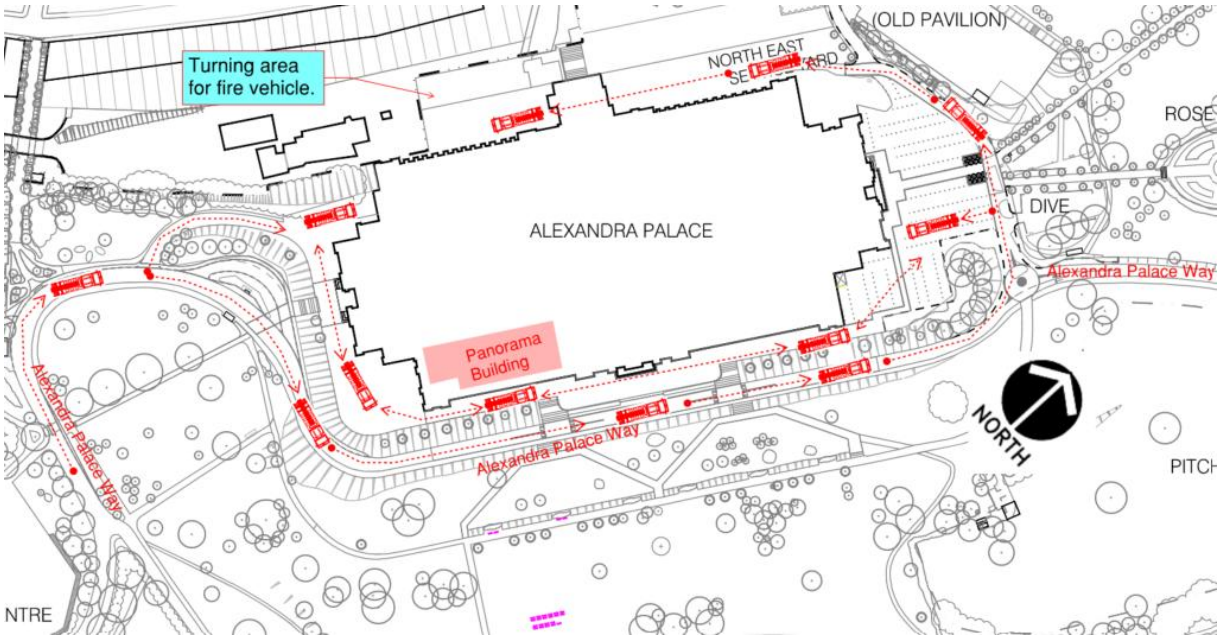


*Figure 1: Fire appliance access routes and surrounding areas suitable for use as assembly points*

### 4.2 Criterion 2: Information on passive and active safety measures

The proposed redevelopment works will include the provision of the following passive fire protection measures:

- 30-minute fire resisting construction to protect escape routes and enclose areas of fire risk (kitchen, dressing rooms, storage spaces and plant rooms), to BS EN 13501-2: 2023.
- Internal wall and ceiling linings to BS EN 13501-1: 2018, to meet minimum specification outlined in BS 9999: 2017.
- Roof coverings to meet specification of $B_{ROOF}(t4)$, to BS EN 13501-5: 2016.

The Panorama building is to be provided with the following active fire systems:

- A fire detection and alarm system to meet a category L2 system to BS 5839-1: 2025, to be interfaced to the site wide fire alarm system.

- Emergency lighting system throughout, including external areas/ escape routes to BS 5266-1: 2025.
- Emergency signage to BS ISO 3864-1: 2011, BS EN ISO 7010: 2020+A4, A5, A6 and BS 5499-4: 2013.
- Secondary back up power provided to fire safety systems from integral batteries.

The above passive and active fire safety system specification is in line with BS 9999: 2017 guidance.

### 4.3 Criterion 3: Information and data on construction products and materials

The proposed structure is to be constructed from the following materials.

- Clear span aluminium-framed structure.
- Insulated steel sandwich panels for the external walls and roof covering.
- Glazed curtain-wall bays along the external walls.

The primary aluminium-framed structure will not be protected for structural fire resistance; this is acceptable according to BS 9999: 2017 guidance as the structure supports a single storey structure and non-fire rated roof.

The insulated steel sandwich panels and glazed curtain-wall bays will be provided to meet BS 9999: 2017 recommendations for internal wall/ ceiling lining and roof covering specifications. There are no recommendations for the external wall surfaces (as the building is a single storey structure).

### 4.4 Criterion 4 and 5: Information on means of escape and evacuation strategy

The individual Palace buildings are operated according to a zoned evacuation. If there is a confirmed fire incident in one building (zone), occupants are only evacuated from this building of fire origin; all other building occupants remain in place until it is deemed necessary to evacuate other fire zones by building management. This arrangement is acceptable as the individual buildings are separated with fire compartmentation (separate fire alarm zones).

The Panorama building is to be operated on a simultaneous evacuation strategy, based on a two-stage fire alarm regime as outlined below.

- Stage 1: An alert signal is sent to the fire alarm panel (or relevant staffed management areas) upon activation of a single smoke detector. This alert must be acknowledged by a member of staff within a period of 1-2 minutes. After acknowledgement, an investigation period of 5 minutes is then commenced to allow the source of the fire signal to be explored.
- Stage 2: Initiated by the activation of two or more smoke detectors, a single heat detector and manual call point; or through the elapse of the investigation period/ time delay without acknowledgement from a staff member.

The occupancy of the Panorama building will be a total of 600 people, consisting of 530 patrons and 70 staff members/ performers).

As the Panorama building will be a single storey structure, there are no vertical escape considerations. New storey exits on the ground floor will provide an exit capacity of 850 people; this is adequate for the anticipated occupant loading of the building. The configuration of storey exits will be such that all travel distances will be within BS 9999: 2017 prescribed limits.

Most of the storey exits from the Panorama building will lead directly to outside without passing through adjoining buildings on site. There will be one back of house (BoH) escape route that will pass through the West Corridor (adjacent to the West Hall) and West Lightwell (adjacent to the Great Hall); this BoH escape route is to be used by a limited number of people (less than 60 people) from the WCs and BoH areas of the Panorama building. The use of this alternative escape route from the Panorama building will not necessitate for the simultaneous evacuation of the West Hall or Great Hall. The means of escape from the proposed redevelopment works will therefore not affect existing means of escape measures in the existing adjoining site buildings.

All internal areas of the Panorama building are provided with level egress to outside. People with mobility impairments will therefore be able to evacuate the building without additional assistance. The arrangement for the egress for people with mobility impairments is therefore acceptable.

### 4.5 Criterion 6: Information on access and equipment for firefighting

The fire and rescue service will access the wider site through Alexandra Palace Way. The fire and rescue service can access the Panorama building from a secondary access road from Alexandra Palace Way on the South-West side of the Palace building.

Fire service access around the wider Palace building provided to all elevations and to 100% of the building perimeter. This arrangement meets BS 9999: 2017 guidance and will be retained as existing; the proposed works do not affect the existing firefighting provisions.

Water supply for the fire and rescue service will be provided from existing private hydrants (see Figure 2 below). The current fire service water supply arrangements are acceptable and to be retained as existing.

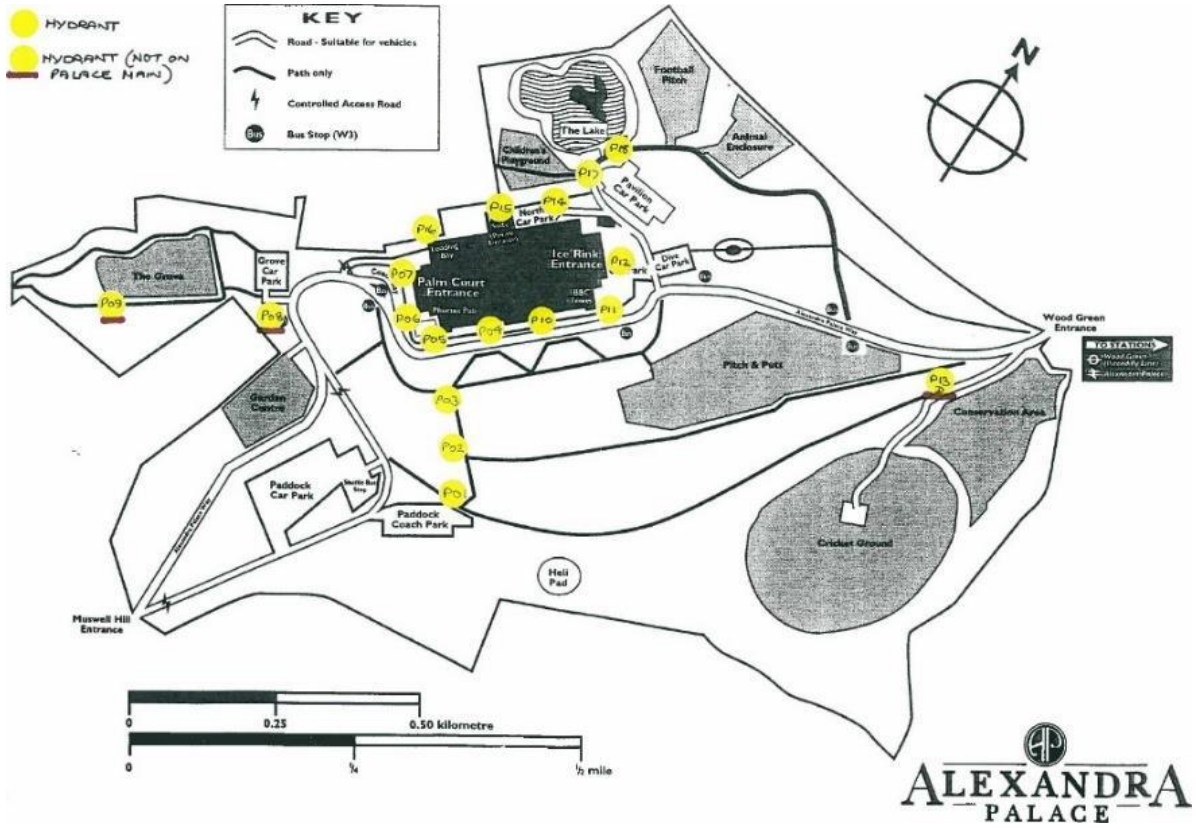


*Figure 2: Existing private hydrants around the Alexandra Palace wider site*

## 5 Conclusions

This Reasonable Exception Statement has outlined the reasons why the London Plan (Fire Safety) Policy D12(A) does not apply to the limited redevelopment works proposed at Alexandra Palace – Panorama Building. This is due to the following reasons:

- The proposed works being to a limited footprint of the wider site. The proposed works will not increase either the existing wider building footprint or its height.
- The proposed works will not alter the wider building structural elements and envelop (façades and roof).
- The proposed redevelopment work will retain the existing site wide zoned evacuation strategy.
- The proposed redevelopment works will not affect existing means of escape for other Palace buildings.
- The evacuation of people with mobility impairments will be through unassisted egress directly to outside as there is level egress from the ground floor.
- Fire safety systems proposed for the redeveloped Panorama building will consist of:
    - A category L2 fire detection and alarm system to BS 5839-1: 2025,
    - Emergency lighting system to BS 5266-1: 2016,

  - Emergency signage to BS ISO 3864-1: 2011, BS EN ISO 7010: 2020+A4, A5, A6 and BS 5499-4: 2013,
  - Secondary back up power provided to the above fire safety systems from integral batteries.
- Firefighting provisions are based on perimeter access to the wider site. These provisions will not be affected by the proposed redevelopment works. Water supply for the fire and rescue service will be provided from private hydrants as existing.

Due to the reasons outlined above, The Fire Surgery does not consider the London Plan Policy D12(A) to be applicable to the proposed redevelopment works.