LONDON PLAN FIRE STATEMENT

Proposed three-storey extension to northeast corner of existing hotel and single upward extension. New main entrance façade, exterior cladding and dressing and new fenestration to all windows. Associated works to include internal reconfiguration and repurposing to deliver rooftop restaurant and bar, new large restaurant and bar, new reception and overflow reception, seventeen additional bedrooms together with plant rooms, luggage storage and a new sub-station.

First Inn Venue Wimbledon Ltd Holiday Inn Express

200 High Street – Colliers Wood – SW19 2BH

Control Sheet	
Site Address	Holiday Inn Express – 200 High Street Colliers Wood SW19 2BH
Report Ref:	
Prepared by:	**S Dalvi MEng (Hons) Civil Engineering** **ILM – Level 3 Award in Management and Leadership.** **MIFE** **Fire Engineering 13+years**
Issue No.	**1 January 2025**

Summary / Declaration of Compliance

Providing that the recommendations within this Fire Statement are followed, it is my professional opinion that the scheme proposals, as they continue to develop, will meet or exceed the requirements of the London Plan Policies D12(A) & (B).

In the author's view, Policy D5 is not applicable in full, and therefore Form 4 (Reasonable Exception Statement) has been completed in Section 2.3 of this report with further justification/explanation provided in Section 4.2.

This London Plan statement does not constitute a definitive document for construction purposes; rather, it demonstrates that the key considerations pertaining to fire safety, as outlined in the London Plan, have been duly identified and appropriately addressed.

It is essential to acknowledge that the development is currently in the preliminary stages of design and requires further assessment and detail to ensure full compliance with applicable legislation. The core design principles and methodology have been articulated within this planning statement; however, additional reviews and elaboration are necessary to advance the design and construction process effectively.

The onus rests with the Principal Designers to conduct a comprehensive evaluation of fire safety provisions as they navigate through the RIBA Stages towards project completion and handover.

This Fire Statement should be included in the suite of documents submitted as part of the development's full planning application.

If there are any changes to the scheme which require subsequent Section 96a or Section 73 applications, this Fire Statement may need to be reviewed and amended, as required, and the revised Fire Statement will need to be submitted as part of the revised application. This is necessary to ensure that the proposed scheme amendments are appropriately captured and that the content of the Fire Statement remains consistent with the latest scheme proposals.

Contents

1. Introduction

1.1.1 This report has been prepared to support the planning application for the refurbishment and extension of the **Holiday Inn Express (HIEX), 200 High Street, Colliers Wood, London, SW19 2BH.**

1.1.2 This report constitutes the London Plan Fire Statement and provides an overview of the HIEX development in London with a view to demonstrating how the proposed development is considered to comply with The London Plan 2021 Policy D12 Fire Safety. It also includes a Reasonable Exception Statement in lieu of full compliance with Policy D5 Inclusive Design (B5).

1.2 Description of the Development

1.2.1 Wimbledon Holiday Inn Express is situated within Colliers Wood which forms part of Merton, a London Borough in South West London**. HIEX is located at 200 High Street, Colliers Wood, London**, as depicted in Figure 1.1.

1.2.2 The planning history suggests the site was occupied by a 5 and 6 storey mixed-use building in 1974, which was later redeveloped into an office building. In 1998, the office building was converted into a hotel and several material alterations have been made since this date. For further detail please refer to the Design and Access Statement produced by Axiom Architects (July 2023).

1.2.3 The existing Holiday Inn Express comprises 156 No. guest rooms across 4 storeys (Ground – Third Floor). The existing ground floor consists of 1no accessible room, restaurant and unused meeting rooms. A coffee concession operated by Coffee Republic is situated at the eastern corner of the site, and a commercial gym is operated from a retail unit on the ground floor. Car parking for the hotel is positioned within the building under-croft and ground floor level, to the south and west of the site.

Figure 1.1 Site Location and Surrounding Context

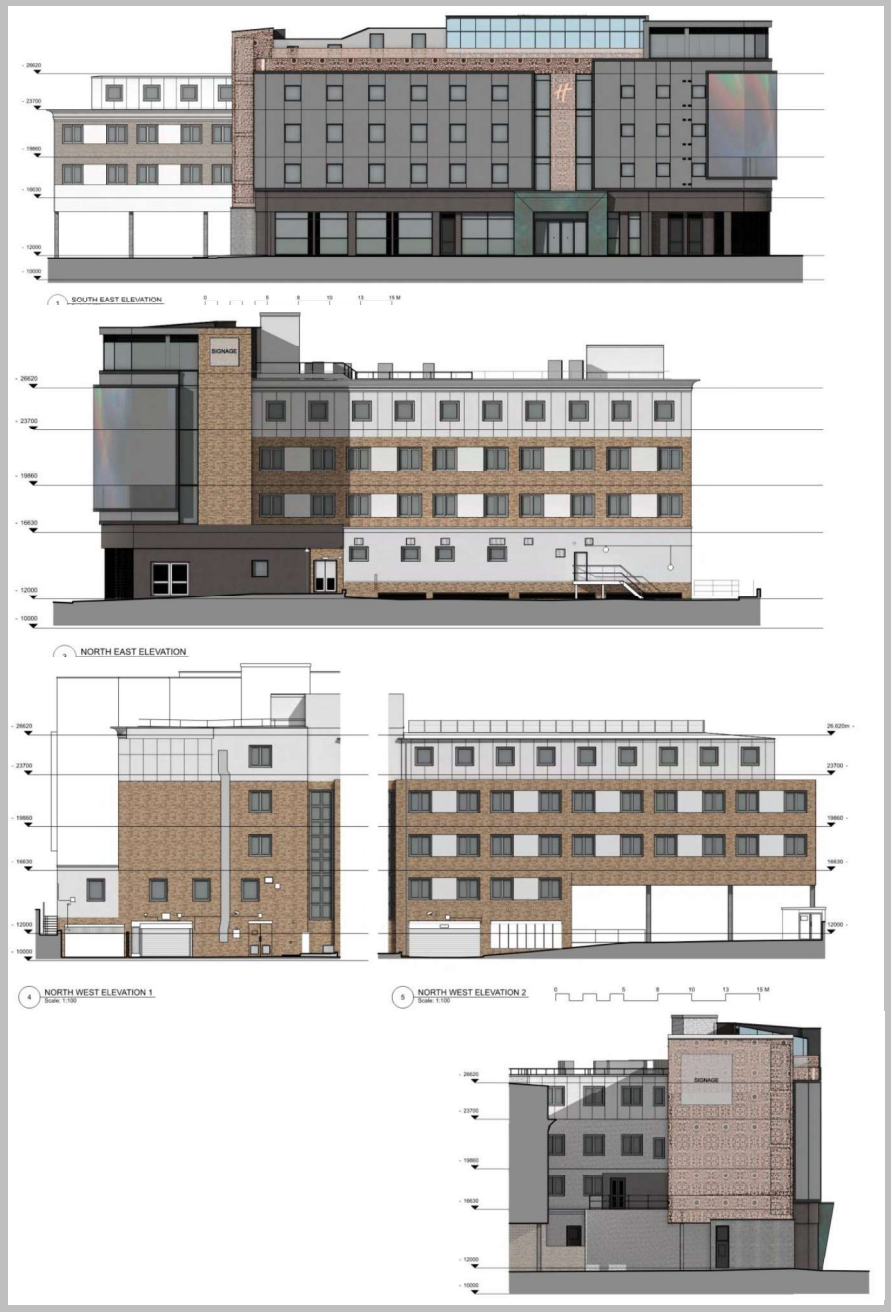

Figure 1.2 Proposed Elevations of the Building

1.2.4 The proposed changes to the development include:

- Ground Floor:
  - Addition of eight bedrooms.
  - Relocation of the UKPN substation and creation of another bedroom in its place.
  - Addition of a restaurant and further office/reception space.
- First, Second, and Third Floors:
  - Addition of three bedrooms on each floor.
  - These floors appear straightforward with no new non-compliances.
- Roof Level:
  - Addition of a bar and office spaces.

1.3 Qualifications of the Author

Table 1.1 Qualifications of the Author

Qualifications	
Name	Shamuil Dalvi
Academic Qualifications	MEng (Hons) Civil Engineering ILM - Level 3 Award in Management and Leadership
Professional Qualification	MI FireE (Membership No. 00052835) Member grade of Institution of Fire Engineers
Role	Authoriser

1.4 Design Codes/Standards

1.4.1 The building will adopt the principles contained within Approved Document B, Volume 2, 2019 edition incorporating 2020 and 2022 amendments (ADB) to fulfil the requirements of Part B of the Building Regulations. Additionally, the client has issued hotel standards which will also be considered: IHG Technical Handbook Brand Safety, Engineering and Acoustics (November 2023). These will be used as the basis of the fire safety design for the HIEX development.

1.4.2 Guidance contained within BS 9999:2017 – *Fire safety in the design, management and use of buildings – Code of practice* may also be adopted to supplement recommendations where ADB is silent.

1.5 Documentation Used

1.5.1 This Fire Statement is based on the drawings and documents listed within :

Table 1.2 Documentation Used

Description	Drawing Number	Originator	Revision
Location And Block Plan	5823-P1-001	Axiom Architects	-
Existing Basement Plan	5823-P3-100A	Axiom Architects	A
Existing Ground Floor Plan	5823-P3-101B	Axiom Architects	B
Existing First Floor Plan	5823-P3-102B	Axiom Architects	B
Existing Second Floor Plan	5823-P3-103B	Axiom Architects	B
Existing Third Floor Plan	5823-P3-104B	Axiom Architects	B
Existing Roof Level Plan	5823-P3-105A	Axiom Architects	A
Proposed Ground Floor Plan	5823-P3-111C	Axiom Architects	C
Proposed First Floor Plan	5823-P3-112C	Axiom Architects	C
Proposed Second Floor Plan	5823-P3-113C	Axiom Architects	C
Proposed Third Floor Plan	5823-P3-114C	Axiom Architects	C
Proposed Roof Level	5823-P3-115C	Axiom Architects	C
Existing South East Elevation	5823-P3-120B	Axiom Architects	B
Existing North Elevations-2	5823-P3-121A	Axiom Architects	A
Proposed South East Elevation	5823-P3-125C	Axiom Architects	C
Proposed North Elevations	5823-P3-126C	Axiom Architects	C
Design and Access Statement	5823-P4	Axiom Architects	P4
Structural Statement	P23-001	Simpsons Associates Consulting Engineers LLP	-

2. London Plan Policy Overview D12(A), D12(B) and D5(B5)

2.1 General

2.1.1 The London Plan 2021 includes two design policies to be taken into account when considering Fire Safety: Policy D5, "Inclusive Design," and Policy D12, "Fire Safety". Policy D12 is broken into two policies D12(A) and D12(B), with Policy D12(B):

- **D12(A) (Planning Fire Safety Strategy - PFSS)**: This applies to all buildings requiring planning permission in London.
- **D12(B) (London Plan Fire Statement)**: Applies to major developments and incorporates all measures outlined in D12(A).
- **D5**: Focuses on ensuring safe and dignified emergency evacuation for all users independently.

2.1.2 The HIEX development has a floor space greater than 1,000 m^2. Therefore, it is considered a major development, and Policy D12(A) and D12(B) apply.

2.1.3 Compliance with Policy D12(A) forms part of the requirements under the Policy D12(B) checklist, as shown in Table 2.1. Hence, to simplify fire safety matters and to avoid repetition, Policy D12(B) will be detailed in full, and references will be made in this document accordingly.

Since both London Plan policies D12(A) and D12(B) apply, this necessitates using Form 1. Policy D12(B) includes requirements for evacuation lifts and triggers Policy D5, requiring Form 3. However, as the changes to the upper floors are minimal, the author contends that Policy D5 is not applicable; sufficient justification for this will be provided in Section 4.2.

When a policy is deemed not applicable, the London Plan suggests submitting a Reasonable Exception Statement (RES) using Form 4. However, Form 4 templates do not cater specifically to major developments. The author has attempted to adapt these templates for planning submission noting that the London Plan format does not fully address this scenario.

In conclusion, Forms 1 and 4 are used for planning submission purposes, in the following subsections. These forms refer to relevant sections of the report which provide a detailed assessment of the proposed development in relation to fire safety.

2.2 Form 1 - D12(B) Fire Statement Checklist

2.2.1 Greater London Authority London Plan Guidance Sheet Policy D12(B) has identified a checklist for planners and applicants. It defines the criteria against which the planning officer will be checking the Fire Statement. The checklist is reproduced in Table 2.1.

2.2.2 The checklist has been amended to remove reference to Planning Gateway One references as the building is not required to go through Planning Gateway One.

Table 2.1 Form 1 - London Plan Policy D12(B) Checklist

Policy considerations	Reference Section within this report
Site Address	Section 1.2
Description of development	Section 1.2
Name, qualifications, professional memberships and experience of authors	Section 1.3
Has a Gateway One Statement been submitted?	No – Not Applicable
D12 (B1) The building's construction: methods, products and materials used, including manufacturers' details	Section 4.1
D12 (B2) The means of escape for all building users: suitably designed stair cores, escape for building users who are disabled or require level access, and associated evacuation strategy approach	Section 4.2
D12 (B3) Features which reduce the risk to life: fire alarm systems, passive and active fire safety measures and associated management and maintenance plans	Section 4.3
D12 (B4) 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	Section 4.4
D12 (B5) How provision will be made within the curtilage of the site to enable fire appliances to gain access to the building	Section 4.4
D12 (B6) Ensuring that any potential future modifications to the building will be taken into account and not compromise the base build fire safety/protection measures."	Section 0
Where a lift core is provided, at least one lift is an evacuation lift	Refer to 0 and Section 4.2 (Page 10)
Declaration of Compliance by a competent person	Section 5

2.3 Form 4 - Reasonable Exception Statement Checklist in lieu of Policy D5

Table 2.2 Form 4 - London Plan Policy Reasonable Exception Statement Checklist in lieu of Policy D5

Policy considerations	Reference Section within this report
Site Address	Section 1.2
Description of development	Section 1.2
Name, qualifications, professional memberships and experience of authors	Section 1.3
Category of development	Major Development
D12 (A1) Information on space provisions for fire appliances and assembly points	Section 3.1
D12 (A2) Information on passive and active safety measures	Section 4.3 – Policy D12(B3)
D12 (A3) Information and data on construction products and materials	Section 4.1 – Policy D12(B1)
D12 (A4) Information on means of escape and evacuation strategy	Section 4.2 – Policy D12(B2)
D12 (A5) Information on evacuation	Section 4.2 – Policy D12(B2)
D12 (A6) Information on access and equipment for firefighting	Section 4.4 – Policy D12(B4) and Policy D12 (B5).

3. Requirements of London Plan Policy D12(A)

This section of the report is supplemented by a Concept Fire Strategy Review and Markup in Appendix A. This markup provides a high level overview of the fire safety provisions within the proposed building as well as proposed amendments to the design moving forward at the next stage of design.

3.1 Policy D12(A1): Identify suitably positioned unobstructed outside space appropriate for use as an Evacuation Assembly Point (EAP)

3.1.1 Upon activation of the fire alarm and confirmation of a fire (or timeout of the investigation period), all occupants within the HIEX are to egress simultaneously to a designated Evacuation Assembly Point (EAP).

3.1.2 There is no specific design guidance nor prescriptive legislative requirements which are relevant to the designation/design of EAPs; however, some general recommendations and advice can be employed, as below:

- The area should be sufficiently far away from the building (or any building on the site). The horizontal distance from the building should be at least 1.5x the height of the nearest building – this is based on the guidance on means of escape in Section 2.1 of ADB.
- The area should be appropriately sized to accommodate the total number of occupants expected to be within the building.
- Escape from the assembly point to a public domain (roadway, concourse etc) should be possible without needing to travel near or within the building.

3.1.3 As outlined above, these are only our recommendations and are not considered requirements which must be met. Ultimately, the designation of the EAP is the responsibility of the 'Responsible Person' (as defined in the *Regulatory (Reform) Fire Safety Order 2005*).

3.1.4 The existing EAP is located in the covered section of the ground floor car park, as depicted in Figure 3.1 and Figure 3.2.

3.1.5 Based on the above, one possible improvement for the location of an EAP has been illustrated in Figure 3.2. This location should be reviewed by the 'Responsible Person' to confirm that it is suitable.

3.2 Policy D12(A2): 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

3.2.1 This is addressed under Section 4.3 – Policy D12(B3).

3.3 Policy D12(A3): Constructed in an appropriate way to minimise the risk of fire spread

3.3.1 This is addressed under Section 4.1 – Policy D12(B1).

3.4 Policy D12(A4): Suitable and convenient means of escape, and associated evacuation strategy for all building users

3.4.1 This is addressed under Section 4.2 – Policy D12(B2).

3.5 Policy D12(A5): A robust strategy for evacuation which can be periodically updated and published, and which all building users can have confidence in

3.5.1 This is addressed under Section 4.2 – Policy D12(B2).

3.6 Policy D12(A6): Suitable access and equipment for firefighting which is appropriate for the size and use of the development

This is addressed under Section 4.4 – Policy D12(B4) and Policy D12 (B5).

Figure 3.1 Evacuation Assembly Point Location (Image)

Figure 3.2 Evacuation Assembly Point Location

4. Requirements of London Plan Policy D12(B)

This section of the report is supplemented by a Concept Fire Strategy Review and Markup in Appendix A. This markup provides a high-level overview of the fire safety provisions within the proposed building as well as proposed amendments to the design moving forward at the next stage of design.

4.1 Policy D12(B1): Construction methods, products and materials used

4.1.1 The existing building is constructed using traditional building methods. Any proposed extension is expected to use a traditional building method such as concrete frame or steel frame with concrete floor slabs.

According to the London Plan guidance document for Policy D12, any work done to create or refurbish external walls must use materials that are rated Class A2-s1, d0 or better as per BS EN 13501-1 except for the exempt elements as set out under Regulation 7(3) of the Building Regulations".

As best practice, it is also recommended that efforts be made to remove or replace any existing combustible materials within the external walls, where feasible. This should be reviewed in the next stage of the design process.

4.1.2 Very limited manufacturer details for proposed products and materials have been provided at this stage to determine whether this would be the case for the proposed external wall build-up. However, it is understood that the proposed design is fully intended to comply with B4 of the Building Regulations. As such, a detailed review of the external wall details proposed will need to be undertaken by the design team at the next stage of design.

4.1.3 The eastern corner of the building is being extended and, hence, will be closer to the site boundary on this side. It is recommended that an external fire spread analysis is carried out at the next stage of design to confirm how much of this wall may be unprotected. An initial assessment has revealed that the construction of this section of the building may need to be fire-rated, and only openings complying with Section 13 of ADB will be permitted.

4.1.4 Small unprotected openings (Diagram 13.5 of ADB) are permitted regardless of boundary distances, reproduced in Figure 4.1.

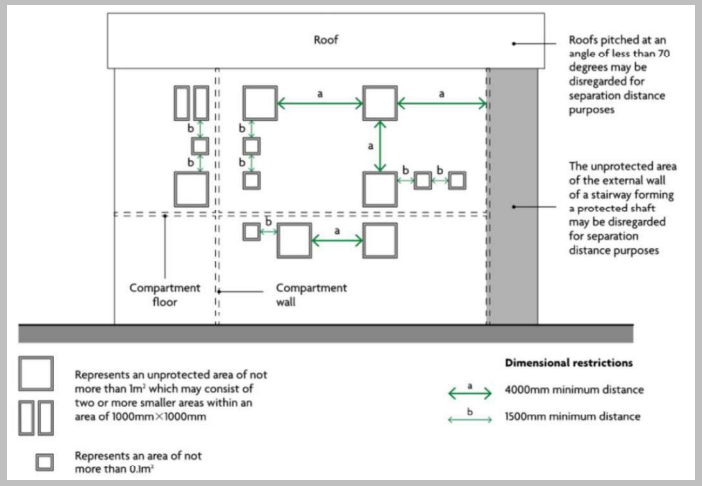

Figure 4.1 Small unprotected areas that may be disregarded in assessing boundary separation distance

4.2 Policy D12(B2): Means of Escape and Evacuation

Design Approach

4.2.1 For any building, whether it is new or existing, it is imperative to ensure that all occupants will be able to safely escape the building in line with Part B of the Building Regulations and other relevant legislation as detailed in Section 0. However, it is also recognised that since the HIEX is an existing building, it may not be feasible to upgrade all parts of the building to achieve current prescriptive code compliance.

4.2.2 Where it is deemed unfeasible or significantly disproportionate to the building works being done, alternative means of compliance (fire engineered solutions) may be recommended in lieu of prescriptive compliance.

Evacuation Strategy

4.2.3 The current evacuation strategy involves simultaneous evacuation with a designated investigation period. When a smoke or heat detector is activated, a general building-wide alarm is not sounded initially and only the room of origin is alerted. An alert is also sent to management, who are responsible for investigating the cause of the alarm to ascertain whether it is a false alarm and carry out first aid fire-fighting where safe and appropriate to do so.

4.2.4 If the fire is extinguished or the alert is found to be a false alarm, management will cancel the alarm sequence to prevent a building-wide evacuation.

4.2.5 If a fire is confirmed and is not extinguished by first aid firefighting, building management shall initiate a building wide evacuation.

4.2.6 If management is unavailable or does not respond to the alert, the fire alarm will automatically engage full evacuation mode, facilitating a comprehensive simultaneous evacuation of the building.

4.2.7 The specific parameters around the investigation period are to be confirmed at the next stage of design.

General Egress Provisions

4.2.8 Access and egress for the general public and hotel guests shall maintain a minimum of 850 mm clear width in all accessible areas in line with ADB.

4.2.9 Access and egress for all other areas shall achieve a minimum 750 mm clear width or be no worse than existing.

4.2.10 Some areas may require additional means of escape commensurate with the number of occupants within that space. An initial high level assessment has confirmed that sufficient exits have been provided in the proposed design. A complete occupant assessment is to be carried out and this is to be confirmed at the next stage of design.

4.2.11 Emergency lighting, meeting the recommendations of BS 5266 and BS EN 1838, will be provided in the following areas:

- All common escape routes (including external escape routes)
- Electricity and generator rooms
- Switch room/battery room for emergency lighting system

4.2.12 Emergency lighting should also meet the requirements of Section 8.01 of the IHG Brand Standards

4.2.13 Exit Signage is to be provided as per Clause 5.28 of ADB and Clause 8.02 of the IHG Brand Standards.

Stair core design

4.2.14 The building currently has three sets of stairs, each providing a clear width of at least 1,100 mm

4.2.15 The three stairs are strategically located at the extremities of the building, with one positioned at the centre, as depicted in Figure 4.2; this means that there are no extended travel distances on upper floors and occupants will generally have two escape directions.

Figure 4.2 Stair Locations

4.2.16 The stairs do not appear to be lobbied in all locations. However, this is acceptable as they are not required to be lobbied. Nonetheless, it is recommended that where lobbies are provided, these lobbies are maintained.

Stair 3 provides egress for occupants from Level 1 – 3; however, the final discharge is achieved by connecting to the stairs of the adjacent residential building.

The maintenance manager has confirmed (on a site visit on 28/12/2024) that there is an agreement between the owners of both buildings. This agreement stipulates that the adjacent stairwell must be unobstructed and accessible for hotel occupants for emergency escape purposes at all times.

This matter is to be formally addressed at the next stage of the design.

Escape of Mobility Impaired Persons (MIP) and function of lifts

4.2.17 The London Plan Policy D5(B5) states that: "Development proposals should achieve the highest standards of accessible and inclusive design. They 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 fire evacuation lift suitable to be used to evacuate people who require level access from the building."

4.2.18 Implementing the above policy in full, would require replacing all existing lifts on each level to comply with the current evacuation lift size requirements or adding three new lifts entirely. This would involve significant demolition work on the existing structure which is disproportionate to the proposed changes.

4.2.19 Although it is possible to install a new lift in the area of the proposed works (eastern corner), it would not be beneficial for escape purposes as it would not be connected to a stair. The modifications on the upper floors include adding three new units, bringing the total number of units to 50, a minor increase relative to the remainder of the building.

It is recommended that at least one lift be designated as an evacuation lift and strategically located to facilitate independent escape for individuals with mobility impairments. Therefore, Lift L3 (associated with Stair 1 – see Figure 4.2) should be reinstalled as a full evacuation lift, designed and installed in accordance with BS EN 81-20 and BS EN 81-70 standards.

4.2.20 In consideration of the above the following provisions are also recommended to facilitate the escape of mobility-impaired persons:

- All stairs will be provided with a refuge space with a Type-B Emergency Voice Communication (EVC) point (complying with BS 5839-9) for effective communication to a central control point.
- Mobility-impaired occupants will receive a Personal Emergency Evacuation Plan (PEEP) upon arrival, outlining procedures in the event of a fire.
- Accessible rooms will be located exclusively on the ground floor, minimising the risk of mobility-impaired occupants on upper levels.
- Evacuation chairs will be placed in each stairway, and staff will be trained in their proper use during emergencies.
- To further mitigate the risk of stairs being compromised by smoke and fire, each stair will be afforded a protected lobby.
- There will be at least two accessible escape routes from the discharge level, allowing mobility-impaired occupants to escape without needing to use stairs or lifts. This can be achieved by constructing suitable ramps.

4.2.21 By incorporating the above measures, MIPs will have direct escape routes on lower levels and access to three separate protected stair locations on upper levels, that include functioning EVC points and refuge areas for awaiting rescue. MIPs will also receive thorough briefings through the Personal Emergency Evacuation Plan (PEEP) to ensure a swift escape. To enhance safety, management will reduce the number of mobility-impaired occupants on upper floors by relocating them to the ground floor, facilitating a dignified evacuation.

Finally, and most crucially, the incorporation of an evacuation lift will facilitate unassisted escape for MIPs from upper levels, marking a considerable improvement over the current building conditions.

4.2.22 In the author's view, the aforementioned measures are significantly better than the current situation and comply with Building Regulations. It is contended that Policy D5 is not applicable in full, as it is overly stringent in the context of the changes being made to the HIEX development which is currently operational and is expected to have been compliant at the time of construction without evacuation lifts.

4.2.23 In conclusion, reasonable efforts have been made at this early stage to explore feasible options and provide recommendations which mitigate to life safety as a consequence of fire. While it is not feasible to provide one lift per core (as required by London Plan Policy D5), the measures outlined above create a robust package of safety provisions to significantly lower the risk of mobility-impaired occupants being affected by fire. This rationale underpins the reasonable exception statement presented in this section.

4.3 Policy D12 (B3): Features which reduce the risk to life

Active fire safety measures

4.3.1 The existing hotel appears to have detectors in every bedroom and all escape routes. It is recommended that a Category L1 fire alarm and detection system be provided in accordance with BS 5839-1, to achieve compliance with both ADB and IHG Brand Standards.

4.3.2 The investigation period for the fire alarm must be included in the management strategy, and a failsafe shall be established. If no one attends the investigation period, it will automatically switch to full evacuation mode.

4.3.3 No sprinklers are provided in the existing building. Whilst sprinklers maybe beneficial, they are not proposed or required at this stage.

Clause 5.01 of the IHG Brand Standards recommends that a risk assessment be carried out to determine whether the omission of a sprinkler system is suitable. This is to be developed further at the next stage of design.

4.3.4 As the basement is less than 3 m below ground, smoke outlets are not required, however, it should be noted that whilst the lowest level is technically considered a basement, it has a direct escape and opening on the Northwestern façade and, therefore, if smoke clearance is required, these openings are likely to be sufficient.

4.3.5 Firefighting lifts are not proposed or required.

4.3.6 Secondary power supply shall serve all life safety systems in line with Section 38.2.3 of BS 9999.

Passive fire safety measures

4.3.7 The topmost occupied storey in the building (including the proposed roof level) is less than 18m when measured from the lowest fire service access level; hence, the elements of the structure are required to achieve at least 60 minutes of load-bearing fire resistance. It should also be noted that the IHG brand standards require this to be enhanced to 90 minutes. This is to be discussed further at the next stage of design.

4.3.8 Fire compartmentation is to be achieved in line with the requirements of ADB and IHG Brand Standards (whichever is more onerous). i.e. The following are to be constructed/maintained as Compartment Floors / Walls:

- Any wall common to two or more buildings.
- Parts of a building are occupied mainly for different purposes except if they are ancillary.
- Enclosing a protected shaft.
- All floors except the lowest floor

4.3.9 All openings for pipes, ducts, conduits or cables that pass through and/or any joints between fire-separating elements should be appropriately fire-stopped with consideration for any potential thermal movement of pipes and ducts.

Management and Maintenance plans

4.3.10 An accurate record of fire precautions and procedures for operating and maintaining any fire protection measures within the building is necessary to enable the owner or end-user to plan, document and implement control processes for the maintenance and testing of fire safety systems to ensure that they operate effectively in the event of a fire. Recommendations for the maintenance of fire safety equipment and provisions are given in Clause 42.2 and Annex I of BS 9999.

4.3.11 Under the Regulatory Reform (Fire Safety) Order 2005, the responsible person must make and give effect to such arrangements as are appropriate to the size of their undertaking and the nature of its activities, for the effective planning, organisation, control, monitoring and review of the preventative and protective measures. The Regulatory Reform (Fire Safety) Order 2005 places a legal obligation upon the responsible person to undertake a suitable and sufficient fire risk assessment.

4.3.12 The organisation should define and document its fire risk management strategy. The fire risk management strategy shall address the following seven factors of strategic fire risk management:

- Fire risk assessment
- Resources and authority
- Fire safety training
- Control of work onsite
- Maintenance and testing
- Communication
- Emergency planning

4.3.13 The organisation would be well advised to consider the desirability of third-party certification of conformity with PAS 7: 2013 – Fire Risk Management Systems Specification (A British Standards Institution publication). Appropriate conformity attestation requirements are described in BS EN ISO/IEC 17021. This standard was drafted in accordance with International Standards Organisation (ISO) guidance and, therefore, can be applied across national and geographic boundaries.

4.3.14 As there is a simultaneous evacuation from all floors it should be ensured that management can gain access to all parts of the building to check each room.

4.3.15 Given that the alarm system incorporates an investigation period, it is imperative to have trained personnel present on-site at all times to execute the investigation procedures. Furthermore, the Responsible Person should conduct a comprehensive risk assessment to ensure that the specific parameters governing the investigation period and the associated fire alarm management are appropriate for the building in question.

4.4 Policy D12(B4) & (B5): Fire Service Access and Facilities

Fire Service Vehicle Access

4.4.1 Access to the development is provided from street level, at the front and the rear of the building Figure 4.3.

4.4.2 Foot access is available from four entrances, one directly into the protected stair adjacent to the Dry riser inlet and fire vehicle parking position.

4.4.3 A fire service vehicle can also park directly adjacent to the main entrance, from which the fire panel and main reception are located in close proximity and are a direct line of sight from the entrance lobby.

4.4.4 The existing highway infrastructure will provide access to the development. The requirements for the pump appliance access to the development are detailed in Table 4.1, that considers the requirements of LFB's Fire Safety Guidance Note 29 (GN29); should any works be undertaken to the existing highways.

Table 4.1 Fire Appliance Access Route Specification

Appliance Type	Minimum width of road between kerbs (m)	Minimum width of gateways (m)	Minimum turning circle between kerbs (m)	Minimum turning circle between walls (m)	Minimum clearance height (m)	Minimum carrying capacity (tonnes)
Pump	3.7	3.1	16.8	19.2	3.7	14 (1)

Note(1): Although Guidance Note 29 (GN29) states that the minimum carrying capacity is 14 tonnes, the above table is subject to agreement with the local Fire Service, as some Fire Services have appliances of greater weight or different sizes.

Fire Service Personnel Access

4.4.5 As the building is less than 18 m in height and is of purpose group 2B, firefighting shafts are not required.

Whilst the topmost storey is proposed to be used as a bar and office space, the useable area is not expected to exceed 900 m^2, and therefore, no firefighting shafts are proposed at this stage.

4.4.6 It is envisioned that access for the fire and rescue service will not be impeded by escaping occupants when the fire service is expected to arrive at the scene, because the simultaneously evacuated areas would be out of the building by that time. Furthermore, and in relation to Policy D12(A1) (Section 3 of this report), the fire assembly point for the building is to be away from the development, where it is sited to cause no hindrance to the Fire Service access, nor will it endanger the escaping occupants once Fire Service operations commence.

Dry Risers / Fire Mains

4.4.7 Vehicle perimeter access is provided to over 50% of the building, and therefore, fire mains are not required. However, a single dry riser inlet has been provided to the Southeastern Stair. It should be noted that this dry riser does not achieve adequate hose coverage to all parts of the building and therefore there are two options proposed:

- Option 1 – Provide an additional dry riser to the Northwestern stair so that the entire hotel is provided with adequate hose coverage.
- Option 2 – achieve compliance based on the existing vehicle access only.

4.4.8 Where installed, dry risers are to be designed and installed as per BS 9990, which requires every part of every storey to be within 45 m of a dry riser outlet (as the building is unsprinklered). This is measured along the shortest route suitable for laying the hose.

Fire Hydrant

4.4.9 There is an existing hydrant located at the interchange of Priory Road and High Street (depicted in Figure 4.3). It is situated within 90 meters of the main entrance of the building and 60 meters of a fire vehicle parking position. **Others to confirm the functionality and suitability of the hydrant.**

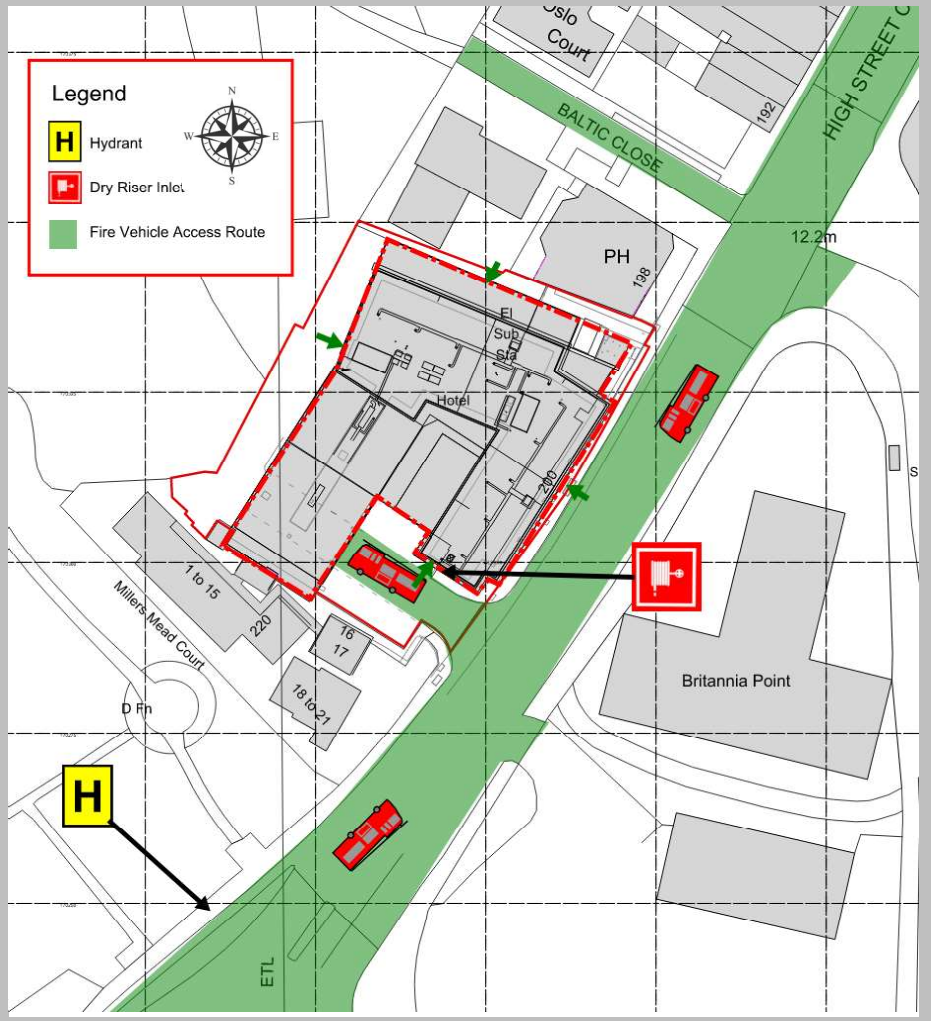

Figure 4.3 Fire Service Access

4.5 Policy D12(B6): Future Modifications (Golden thread)

4.5.1 A requirement of the Building Regulations 2010 (Regulation 38) is that the fire safety information is compiled and handed over to the building user upon completion. This would include the fire safety strategy reports and Operations & Maintenance manuals for the fire safety systems in the buildings.

4.5.2 When any building works will be undertaken (as defined under the Building Regulations) it will be a requirement that following the works the fire safety measures will be no less satisfactory than before. This will therefore require a thorough review of the existing fire safety measures and consideration given to how any works would impact on the fire strategy for the building.

4.5.3 Further to this, the Regulatory Reform (Fire Safety) Order 2005 will be applicable when the building is occupied, and a requirement of this legislation is the management of fire risks and the requirement to document a fire risk assessment for the premises. The duties under this order extend to the maintenance of fire safety equipment.

5. Declaration of Compliance

5.1.1 Providing that the recommendations within this Fire Statement are followed, it is my professional opinion that the scheme proposals, as they continue to develop, will meet or exceed the requirements of the London Plan Policies D12(A) & (B).

5.1.2 In the author's view, Policy D5 is not applicable in full, and therefore Form 4 (Reasonable Exception Statement) has been completed in Section 2.3 of this report with further justification/explanation provided in Section 4.2.

5.1.3 This London Plan statement does not constitute a definitive document for construction purposes; rather, it demonstrates that the key considerations pertaining to fire safety, as outlined in the London Plan, have been duly identified and appropriately addressed.

It is essential to acknowledge that the development is currently in the preliminary stages of design and requires further assessment and detail to ensure full compliance with applicable legislation. The core design principles and methodology have been articulated within this planning statement; however, additional reviews and elaboration are necessary to advance the design and construction process effectively.

The onus rests with the Principal Designers to conduct a comprehensive evaluation of fire safety provisions as they navigate through the RIBA Stages towards project completion and handover.

5.1.4 This Fire Statement should be included in the suite of documents submitted as part of the development's full planning application.

5.1.5 If there are any changes to the scheme which require subsequent Section 96a or Section 73 applications, this Fire Statement may need to be reviewed and amended, as required, and the revised Fire Statement will need to be submitted as part of the revised application. This is necessary to ensure that the proposed scheme amendments are appropriately captured and that the content of the Fire Statement remains consistent with the latest scheme proposals.

Appendix A – Fire Strategy Concept Review & Markup

1 EXISTING BASEMENT
Scale: 1:100

0 5 8 10 13 15 M

Rev	Date	Description	By	Chk
A	09/12/24	ISSUED FOR APPROVAL	AJ	

AXIOM ARCHITECTS
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Tel. 01273 479434 www.axiomarchitects.co.uk

Client
CARTER LAUREN CONSTRUCTION

Project
HOLIDAY INN EXPRESS WIMBLEDON
COLLIERS WOOD
LONDON SW19 2BH

Drawing
EXISTING BASEMENT PLAN

Scale	Date	Drawn	Checked
1:100 @ A1	18/11/24	AJ	AB

Drawing No. 5823-P3- 100 **Revision** A

Status
PLANNING

01 PROPOSED GROUND FLOOR
Scale: 1:100

0 5 8 10 13 15 M

N

Rev	Date	Description	By	Chk
C	19/12/24	ISSUED FOR PLANNING	AJ	

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Drawing
PROPOSED GROUND FLOOR PLAN

Scale	Date	Drawn	Checked
1:100 @ A1	18/11/24	AJ	AB

Drawing No. 5823-P3- 111 **Revision** C

Status
PLANNING

01 PROPOSED FIRST FLOOR
Scale: 1:100

0 5 8 10 13 15 M

N

Rev	Date	Description	By	Chk
C	19/12/24	ISSUED FOR PLANNING Plant enclosure revised	AJ	

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Drawing
PROPOSED FIRST FLOOR PLAN

Scale	Date	Drawn	Checked
1:100 @ A1	18/11/24	AJ	AB

Drawing No. 5823-P3- 112 **Revision** C

Status
PLANNING

01 PROPOSED SECOND FLOOR
Scale: 1:100

0 5 8 10 13 15 M

N

Rev	Date	Description	By	Chk
C	19/12/24	ISSUED FOR PLANNING	AJ	

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COLLIERS WOOD
LONDON SW19 2BH

Drawing
PROPOSED SECOND FLOOR PLAN

Scale	Date	Drawn	Checked
1:100 @ A1	18/11/24	AJ	AB

Drawing No. 5823-P3- 113 **Revision** C

Status
PLANNING

01 PROPOSED THIRD FLOOR
Scale: 1:100

0 5 8 10 13 15 M

N

Rev	Date	Description	By	Chk
C	19/12/24	ISSUED FOR PLANNING	AJ	

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COLLIERS WOOD
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Drawing
PROPOSED THIRD FLOOR PLAN

Scale	Date	Drawn	Checked
1:100 @ A1	18/11/24	AJ	AB

Drawing No. 5823-P3- 114 **Revision** C

Status
PLANNING

01 PROPOSED ROOF LEVEL
Scale: 1:100

0 5 8 10 13 15 M

Rev	Date	Description	By	Chk
C	19/12/24	ISSUED FOR PLANNING Additional toilets indicated. Enclosed escape route to main stair added	AJ	

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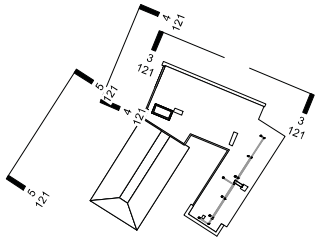
Drawing
PROPOSED ROOF LEVEL
FOURTH FLOOR MEETING ROOM & OFFICE

Scale	Date	Drawn	Checked
1:100 @ A1	18/11/24	AJ	AB

Drawing No. 5823-P3- 115 **Revision** C

Status
PLANNING

3 NORTH EAST ELEVATION
Scale: 1:100



0 Key Plan 01

PROPOSED MATERIALS KEY:

- Dark grey GRC cladding to ground floor
- Feature stock brick, natural mortar to side return elevation
- Patinated copper cladding to entrance portico
- Aluminium feature cladding to profiles and copings
- Anodised aluminium laser cut cladding Dark Umber finish feature cladding and terrace guarding
- Aluminium curtain walling Dark grey
- Dark grey Rockpanel A2 cladding principle cladding

4 NORTH WEST ELEVATION 1
Scale: 1:100

5 NORTH WEST ELEVATION 2
Scale: 1:100

0 5 8 10 13 15 M

Rev	Date	Description	By	Chk
C	19/12/24	ISSUED FOR PLANNING Fourth floor parapet reduced	AJ	

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Drawing
PROPOSED NORTH ELEVATIONS

Scale	Date	Drawn	Checked
1:100 @ A1	18/11/24	AJ	AB

Drawing No. **Revision**
5823-P3- 126 C

Status
PLANNING

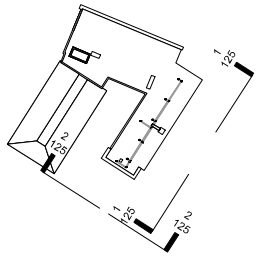
1 SOUTH EAST ELEVATION
Scale: 1:100

0 5 8 10 13 15 M

2 SOUTH WEST ELEVATION
Scale: 1:100

PROPOSED MATERIALS KEY:

- Dark grey GRC cladding to ground floor
- Patinated copper cladding to entrance portico
- Anodised aluminium laser cut cladding Dark Umber finish feature cladding and terrace guarding
- Dark grey Rockpanel A2 cladding principle cladding



0 Key Plan

Rev	Date	Description	By	Chk
C	19/12/24	ISSUED FOR PLANNING Fourth floor parapet reduced. Enclosed escape route added, SW elevation added	AJ	

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Drawing
PROPOSED SOUTH EAST ELEVATION

Scale	Date	Drawn	Checked
1:100 @ A1	18/11/24	AJ	AB

Drawing No. 5823-P3- 125 **Revision** C

Status
PLANNING