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Enfield Council

Emailed to: [REDACTED]@enfield.gov.uk

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

Date 13 October 2022  
Our Ref 32/245958  
Your Ref 21/04742/FUL

Dear Sir/Madam

## RECORD OF CONSULTATION/ADVICE GIVEN

### TOWN AND COUNTRY PLANNING ACT 1990

**SCOPE OF WORKS:** Full planning application for development of Phase 1b of Meridian Water to provide new residential accommodation (Use Class C3), ground floor commercial floorspace (Use Class E (a,b, c, g)), leisure floorspace (Use Class E(d)) and medical centre (Use Class E(e)) across three buildings including ancillary areas to these uses, roads and footpaths, car and cycle parking provision, public open space including areas for play, landscaping and drainage; and areas of landscaping and open space for temporary and meanwhile uses; Submission of an Environmental Statement.

**PREMISES ADDRESS:** Meridian Water, Willoughby Lane And, Meridian Way, London N18

**DOCUMENTS REVIEWED:** Enfield Council Re-consultation - Notice of Revisions to Planning Application – dated 11/05/2022  
Meridian One - Phase 1B HSE Response – dated August 2022  
Meridian One - Phase 1B Design and Access Statement – dated 09/12/21

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

London Fire Brigade (LFB) has been consulted with regard to the above-mentioned premises and makes the following comments/ observations:

#### Protection to the single stairs

1. We note that the design is for tall residential buildings, each relying upon a single staircase for means of escape or firefighting access to all or some storeys. In our opinion, the planning authority should consider a single staircase as a design feature which requires additional justification for a

residential building of this height.

While it may not be appropriate for detailed design following a framework such as that set out in BS 7974 (including a qualitative design review - QDR) to be undertaken at planning stage, the lack of the appropriate number of staircases for buildings of these heights is not something that can necessarily be suitably justified later during the Building Regulations approval process. In our opinion the information provided by the applicant at this stage should recognise that the further design analysis is likely to be required later, and that if the BS 7974 analysis—including a suitably robust QDR—determines that additional facilities are required such as an additional stair, then the project may need to return to planning for review of those changes.

### **Amenity spaces**

2. We note that the design includes features not supported by fire safety guidance, e.g. amenity spaces interacting with the single means of escape, which in our opinion are not compatible with a single stair design:

In our opinion, the planning authority should not consider these aspects appropriate given the reliance on a single staircase. These are not features that can necessarily be suitably justified later during the Building Regulations approval process.

### **General floor plate layout**

3. It should be noted the planning portal contains very little information surrounding the fire safety provisions proposed. Therefore, our review has been based on the detail available and should not be considered exhaustive. We would expect to make further observations in response to any further Town and Country Planning Act application(s) and/or future Building Regulations application(s), in the case of the latter where we expect to be consulted in accordance with statutory requirements. Notwithstanding the above, we raise the following:

- Some internal flat layouts appear to have cooking facilities directly adjacent to the front door / single means of escape from the apartment (Ref: 5.3.2 2B4P-T01). In our opinion, this should be addressed prior to approval.
- The Town Houses appear to have an open stair design: this will require careful consideration and a person-centred design approached should be adopted.
- The scheme appears to have numerous private balconies with continuous elements / directly adjacent to one another. Clear indication as to how this will be considered going forward should be obtained.
- It is noted that car parking facilities on the ground floor level, beneath the podium, are proposed. Careful consideration into electric vehicle charging points / alternative fuel vehicle parking and the potential impact on the building fire safety / firefighting provisions should be undertaken as part of the QDR process.
- It is our expectation that all disabled refuge locations where persons of restricted mobility will be expected to await assistance, such as from trained fire safety management personnel operating the evacuation lift(s), will be protected from the ingress of smoke.
- It is our expectation that the number of evacuation and firefighter's lifts serving each building will incorporate a suitable level of redundancy and take into consideration the impact of maintenance and potential fault conditions such that these facilities are available at all material times for the use of persons of restricted mobility and firefighters. We would recommend that consideration be given to the provision of more than one evacuation and firefighters lift, taking into account the proposed height of these buildings and the proposed numbers of stairs.

#### **Access and facilities for firefighters**

4. It is unclear from the information available what facilities are to be provided for firefighting purposes. However, from the detail reviewed we have concerns surrounding the internal and vehicular access arrangements proposed. There appear to be extended distances and convoluted routes associated with both.

If this is the case, in our opinion, the planning authority should not consider this suitable. Our expectation is that prescriptively applied firefighting access and facilities should be provided as detailed in design guidance (such as Approved Document B, BS 9991 etc.) and considered a minimum provision. The QDR process should be undertaken to ascertain if the minimum expectations of the guidance remain appropriate for a building which departs from said guidance significantly.

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

Yours faithfully,



Assistant Commissioner (Fire Safety)