

**Freedom of Information request:** Reference number FOI2025/00252

**Date of request:** 14th March

**Request:**

We would like full details of the building regulations statutory consultation for Heathside and lethbridge phase 5&6, Blackheath Hill & Lewisham Road. Your ref I have on previous correspondence is 90/160894/MK.

**Response:**

In response to the above, the LFB retain very little in the way of building consultation documents and or plans. If the LFB was consulted, then we may hold a record of the consultation response letter. This will either confirm that the Brigade is satisfied/not satisfied with the proposals.

Our Fire Safety regulatory team have confirmed we do hold a consultation response letter which provided our advice, the letter dated 30<sup>th</sup> September 2021 and 01<sup>st</sup> August 2022 which I have attached below. Personal data has been removed from the attached documents under [section 40 of the FOIA –Personal Information](#).

Further information on the building consultation can be found on Lewisham Councils website [here](#)

We have dealt with your request under the Freedom of Information Act 2000. For more information about this process please see the guidance we publish about making a request on our website: <https://www.london-fire.gov.uk/about-us/transparency/request-information-from-us/>

**Private and Confidential**

Building Control Manager  
Stroma Building Control  
125 Kingsway  
London  
WC2B 6NH

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

Date 01 August 2022  
Our Ref 90/160894/MK  
Your Ref OPP-028771

Dear Sir/Madam

**RECORD OF CONSULTATION/ADVICE GIVEN**

**HEATHSIDE AND LETHBRIDGE PHASE 5&6, BLACKHEATH HILL & LEWISHAM ROAD,  
LEWISHAM, LONDON, SE10 7QR**

**PHASE 5 & 6 OF THE HEATHSIDE AND LETHBRIDGE ESTATE AND REDEVELOPMENT  
COMPRISING THE CONSTRUCTION OF BUILDINGS RANGING FROM SIX TO SEVENTEEN  
(PHASE 5) AND SEVEN TO EIGHT (PHASE 6) STREYS IN HEIGHT TO PROVIDE 443  
RESIDENTIAL UNITS, PARKING, NEW LANDSCAPING AND OTHER ASSOCIATED WORKS.**

**Documents reviewed:**

Stroma Building Control, dated 09/09/2021  
Fire Strategy Report, RIBA Stage 4, BB7, Rev 01, dated 17/07/20  
Heathside Phase 5, CFD Modelling – Corridor Ventilation, BB7, dated 30/12/2019  
Heathside Phase 6, CFD Modelling – Corridor Ventilation, BB7, dated 31/12/2019  
Heathside Phase 5 & 6, Third Party Review Note, Astute Fire, dated 05/06/2020

**Plans:**

12-314 RM004 Rev B, 12477-TDA-P6-XX-DR-C-47501, 503000 rev C1 - 503010 rev C1, 603000 rev C1  
- 603009 rev C1,

Fire Engineering Group has reviewed the above information and has the following observations:

**Fire Engineering Group is not satisfied with the proposals.**

**(1) Comments on proposed scheme primarily relating to the Regulatory Reform (Fire Safety)  
Order 2005**

Note to the building control body: it is expected that a copy of these comments will be passed to the future responsible person for this scheme.

1. Due to the complexity of the site we have found the plans difficult to understand. For example, we note there are duplex flats within this scheme (point 3.3.3) however it is not clear from the plans or strategy as to where these are located and what the layout is. Please provide a larger, clear set of plans which clearly indicate the block boundaries and the final exit routes from each block which will enable us to make undertake a more complete assessment of the proposals.

2. We note that this fire strategy covers 11 blocks of varying heights, layouts, and provisions which in our opinion makes it confusing for the reader to understand as it jumps from block to block without sufficient clarity on each block to enable us to fully review, understand and provide comment in relation to the Regulatory Reform (Fire Safety) Order 2005. We highlight this may also be a concern when handing over building information required by Regulation 38, as its complex nature may prove to be difficult for the responsible person to understand. This will be a particular issue if, in the future, these blocks have different responsible persons therefore meaning some information for the block they manage is not relevant as it pertains to a different block.

There are also a lot of descriptions throughout the strategy with statements like 'the discharge from common stairs and final exits **should** meet the following recommendations' (point 3.7.1). This leaves the reader with a level of ambiguity as to whether this will be adopted within the design or not.

3. Similarly to the above, due to the complexity of the design, we have found the plans provided difficult to understand particularly in relation to where one block stops and the next begins. We request that larger plans are provided and suggest it would be very beneficial to identify the demarcation of each block and ideally flats. This would greatly aid in the understanding of the detail within the fire strategy.
3. We note the information contained within the BB7 fire strategy, however, in our opinion there are several areas that lack sufficient information to allow a holistic understanding of each blocks design. For example:

- a. Point 3.4.2. advises natural or mechanical ventilation will be used with little further detail provided particularly as extended travel distances are present in most of the blocks.

Point 3.9.4 also advises PPV units are proposed as an alternative to BS9991 recommended natural ventilation with no further justification provided.

The plans indicate a sterile area 2m from each building on the podium level (upper ground floor). However, the plans also appear to indicate AOV windows and doors accessing directly into this route which would appear to compromise the means of escape for residents using this route. Please provide further commentary in relation to this aspect.

In our opinion clarification is required in relation to the proposed ventilation throughout the site.

- b. It is unclear whether deck access will be provided on the 4<sup>th</sup> and 5<sup>th</sup> floors of cores Hb, Hc, and Hf (point 3.5). Please provide full commentary and updated plans to reflect whatever the final design will be for this aspect.
- c. We note terraces are present on the plans on the 4<sup>th</sup> floor of phase 5. There appear to be connected balconies to the flats however there is no fire resisting separation dividing the terraces to ensure a fire in one flat does not spread to the other.
- d. The single staircase serving residential tower blocks continues to the basement with no justification provided, just a brief comment that fire resisting construction should be provided (point 3.7.1 and 3.7.3).
- e. Point 6.3.3 suggests the carpark is not included within the sprinkler coverage for these buildings with no justification as to why this is so.
- f. A large number of disabled access carparking spaces are provided within the basement of the phase 5 blocks. Please clarify that the intent is for these blocks is for occupants

with general needs and there is no expectation for a large number of occupants to have reduced mobility.

- g. Whilst we note the comments from Stroma have resulted in the staircase being separated from the basement car park by fire resisting construction (point 3.7.1), a robust justification has not been provided for the single staircases serving the residential floors above, extending into the basement. A robust justification has also not been provided for the connection between the single staircase and the basement car park, both of which are not accepted as per the expectations of guidance.

We would also highlight that the proposed layout separating the basement and ground floors is provided via a single door within the staircase enclosure. This layout has not been justified within the strategy.

Additionally, the proposed layout of the staircases in the blocks in phase 6 is also a concern as occupants appear to have to pass through the staircase coming up from the basement, through the door separating the staircase from basement and ground floors to reach the only final exit on this floor (Plans).

4. The fire strategy advises occupants can either wait within the staircase, even though a disabled refuge is not being provided or using the firefighting lift to evacuate residents with disabilities unable to self-evacuate (point 3.8.1). The firefighting lift however needs to be available on arrival of the fire brigade and consequently is not a suitable method to be exclusively relied upon within this design.

We agree that a method of safe egress of all potential occupants is required and simply proposing the firefighting lift, without ensuring it is always available, is not appropriate.

Furthermore, as indicated within the London Plan 2021, an evacuation lift should be included within this design. It is imperative that the evacuation lift is afforded a level of protection to allow users, who may need to rely upon this provision, to safely use it until evacuated. **In our opinion the current corridor layout will not provide this necessary protection.** The design should, also fully consider how occupants can safely wait for an evacuation lift to arrive and we question how this is achieved without the use of a refuge.

An appropriate design should consider the protection afforded to occupants and this will typically be achieved by the provision of a protected refuge space which should prevent the ingress of smoke for the period it is needed. This enables a safe place for an occupant to await further evacuation. The current design would not provide the appropriate protection from smoke necessary to protect occupants waiting to use an evacuation lift. In fact, such a corridor is designed upon the principle that the corridor will be untenable for a certain period during escape and for an extended period during firefighting operations. While we appreciate the London Plan 2021 may not have been in place prior to the design being submitted for planning approval, we consider that this area of the design should be reassessed.

5. We agree with the statement in point 4.2 that due to the physical connections within these buildings that the structural fire resistance for all the blocks should meet that of the most onerous block (in this case block Ha which is 120 minute fire resistance).
6. We assume the proposed service risers will not be contained within the protects/firefighting staircases (point 4.5).
7. We note that further justification for the ventilations provisions is to be undertaken by computational fluid dynamics modelling. We will await the detailed comments from the BCB or their appointed third party assessors in due course.
8. Whilst we note this strategy was produced in July 2020 and proposes a category 2 sprinkler system, we would draw the building control body's attention to the revised version of BS 9251:

2021. This advises a category 4 system is appropriate for buildings over 45m high. We would strongly recommend the design considers adopting this improvement.

## **(2) Observations on proposed scheme primarily relating to the Building Regulations**

9. Point 3.3.1 advises egress windows may be provided to the town houses. As these do not fall within the fire safety order we assume the building control body will ensure the means of escape from these houses comply with the functional requirements of Building Regulations and that the egress from these windows are practical and safe with no railings etc located near these windows, and that the occupier who needs to escape retain sole control of the space below the escape window so that no one else can compromise the effectiveness of the escape through inappropriate storage.
10. Point 3.3.2 advises it is acceptable to have kitchens above 8m x 4m unenclosed because there is no requirement to have a self-closing device on the door to the kitchen. We disagree with this viewpoint as a fire within an enclosed kitchen will have early means of giving warning provided within it alerting occupants to the fire. The smoke will accumulate within the ceiling area of the kitchen and only compromise the escape route once the smoke layer is at a depth that is below the top of the door frame or if the door is closed then after the door fails. This process allows time for the occupant to escape that is not present in this proposed design. Therefore, we disagree with the justification provided and feel the building control body should seek further robust commentary/justification in relation to these flats.
11. Similarly to the point above, we feel the commentary for the duplex open plan flat (point 3.3.3 and appendix A) relying a hob cut off, an LD1 fire alarm and sprinkler system is insufficient. The alarm and sprinklers are both an expectation within guidance for a single storey open plan flat and, in our opinion, do not necessarily justify the risk an additional floor brings. Therefore, we again are of the opinion that the building control body should seek further robust commentary/justification in relation to these flats.
12. It is unclear why the positioning of the hob is a concern for Stroma (point 3.3.4) as it appears to be within flats with a protected entrance hallway. We assume a 'protected entrance hallway' means it will have 30-minute fire resisting protection. Please clarify.
13. Point 3.6 advises electronic locks may be used on site. Whilst we note egress is in place for means of escape purposes, we would also question how firefighters will access through these doors in an emergency without delay.

## **(3) Additional observations and recommendations relating to proposed scheme**

14. **Regulation 38 (Building Regulations)** Where applicable, we presume that the building control body will check to ensure that adequate fire safety information (as detailed in Section 17 of Approved Document B, Volume 1/Section 19 of Approved Document B, Volume 2) will be issued to the responsible person for the premises at the completion of the project, or when the building or extension is first occupied.

## **(4) Expected outcome of consultation**

Based on the nature of the items raised above in sections 1 to 3:

We would expect to be consulted further to this letter due to the significant issues raised in relation to matters under the Regulatory Reform (Fire Safety) Order 2005 and/or Building Regulations functional

requirement B5 fire and rescue service access and facilities. In our view further information should be provided in regard to the following comments/observations:

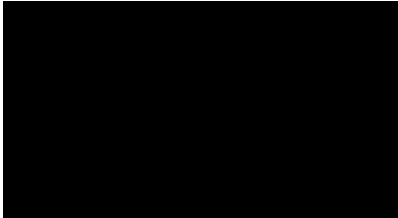
Section 1 and 2 above.

Notwithstanding the above, we presume that all comments raised in this consultation letter will be forwarded to the client/project design team for consideration.

The above observations are in relation to the current proposal and may not be relevant to any future proposal.

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 Regulation)

Reply To: Building Design and Consultation Hub  
(via [FSR-AdminSupport@london-fire.gov.uk](mailto:FSR-AdminSupport@london-fire.gov.uk))

**There is clear evidence that Automatic Water Fire Suppression Systems (AWFSS) can reduce the number of deaths and injuries from fire, as well as reducing the risk to firefighters.**

**The London Fire Brigade strongly encourages those who design, construct and approve residential and commercial buildings, to go beyond the minimum expectation of compliance and include AWFSS in a wider variety of buildings. There are also additional benefits to the inclusion of AWFSS in terms of property protection, environmental protection and business continuity.**

**Further guidance can be found on the Brigade's website.**

Stroma Building Control Ltd  
198 Petts Wood Road  
Petts Wood  
Orpington  
Kent  
BR5 1LG

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

Date 30 September 2021  
Our Ref 90/160894/BL  
Your Ref OPP-028771

Dear Sir/Madam

## **RECORD OF CONSULTATION**

### **REGULATORY REFORM (FIRE SAFETY) ORDER 2005 ARTICLE 46 THE BUILDING (APPROVED INSPECTORS ETC.) REGULATIONS 2010**

**SCOPE OF WORKS:** Phases 5 and 6 of the Heathside and Lethbridge Estate redevelopment comprising the construction of buildings ranging from six to seventeen (Phase 5) and seven to eight (Phase 6) storeys in height to provide 443 residential units, parking, new landscaping and other associated works.

**PREMISES:** Heathside and Lethbridge Phase 5 & 6, Blackheath Hill & Lewisham Road, Lewisham, London, SE10 7QR.

#### **PLAN NUMBER(S):**

15-314 RM004 B; 12477-TDA-P6-XX-DR-C-47501;  
H&L PRC P5 B1 DR A 503000 C1; H&L PRC P5 00 DR A 503001 C1;  
H&L PRC P5 01 DR A 503002 C1; H&L PRC P5 02 DR A 503003 C1;  
H&L PRC P5 03 DR A 503004 C1; H&L PRC P5 04 DR A 503005 C1;  
H&L PRC P5 05 DR A 503006 C1; H&L PRC P5 06 DR A 503007 C1;  
H&L PRC P5 07 DR A 503008 C1; H&L PRC P5 ZZ DR A 503009 C1;  
H&L PRC P5 ZZ DR A 503010 C1;

H&L PRC P6 B1 DR A 603000 C1; H&L PRC P6 00 DR A 603001 C1;  
H&L PRC P6 01 DR A 603002 C1; H&L PRC P6 02 DR A 603003 C1;  
H&L PRC P6 03 DR A 603004 C1; H&L PRC P6 04 DR A 603005 C1;  
H&L PRC P6 05 DR A 603006 C1; H&L PRC P6 06 DR A 603007 C1;  
H&L PRC P6 07 DR A 603008 C1; H&L PRC P6 08 DR A 603009 C1;

#### **DOCUMENTS RECEIVED:**

- Stroma Building Control Ltd consultation letter, from Chris Tang, dated 9<sup>th</sup> September 2021.
- LFB Consultation Pro Forma document, completed by Stroma Building Control Ltd, dated 07/09/2021.
- Third Party Review Note – Heathside, Phases 5 & 6, from Stroma Building Control Ltd, dated 05/06/2020.

- CFD Modelling – Phase 5 Heathside Corridors Ventilation (Issue 01), from BB7 Fire, dated 30/11/2019.
- CFD Modelling – Phase 6 Heathside Corridors Ventilation (Issue 00), from BB7 Fire, dated 31/12/2019.
- Fire Strategy Report: RIBA Stage 4 (Rev 01), from BB7 Fire, dated 17/07/2020.

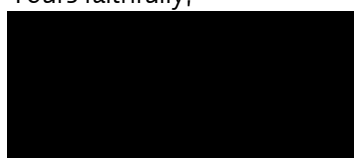
The London Fire Commissioner (the Commissioner) is the fire and rescue authority for London. The Commissioner is responsible for enforcing the Regulatory Reform (Fire Safety) Order 2005 (The Order) in London.

The Commissioner has been consulted with regard to the above-mentioned premises and makes the following observations:

1. The documents indicate a fire engineering solution is in place or being proposed and consultation with the Brigade's Fire Engineering Group will delay the return of our comments for up to 14 weeks.
2. The Fire Engineering Group will be unable to carry out a full evaluation of the proposals until the above listed documents have been received and evaluated by the Fire Engineering Group.

Any queries regarding this letter should be addressed to Bee Liu. 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 Regulation)

Reply to [REDACTED]  
Direct T 020 8555 1200 [REDACTED]  
E [REDACTED]london-fire.gov.uk

**The London Fire Brigade promotes the installation of sprinkler suppression systems, as there is clear evidence that they are effective in suppressing and extinguishing fires; they can help reduce the numbers of deaths and injuries from fire, and the risk to firefighters.**