

Freedom of Information request: Reference number FOI2026/00300

Date of request: 13th March

Request:

In particular, I request:

- Fire investigation reports relating to the fires that occurred at St Mark's Square in 2022 and 2024
- Any reports or internal communications referencing fire spread within the building during these incidents
- Any recommendations made by the London Fire Brigade regarding building safety or fire safety improvements following these incidents
- Any correspondence between the London Fire Brigade and the building owner, managing agent or contractors relating to fire safety concerns at St Mark's Square

If any of the requested information cannot be disclosed in full, please provide any redacted versions that can be released.

Response:

Fire investigation reports and fire incident reports relating to the incidents in 2022 and 2024, would be processed by our Incident Reports team. Incident Reports are generally subject to a charge and are exempt from Freedom of Information provisions as they are "information accessible by other means" under [Section 21 of the Freedom of Information Act](#). You would need to meet the eligibility criteria but you can find more information on how to request these reports here <https://www.london-fire.gov.uk/about-us/services-and-facilities/services-we-offer/incident-reports/>

- Any recommendations made by the London Fire Brigade regarding building safety or fire safety improvements following these incidents
- Any correspondence between the London Fire Brigade and the building owner, managing agent or contractors relating to fire safety concerns at St Mark's Square

Our Fire safety regulatory team have confirmed a Fire Safety Audit took place in August 2022 at Brouard Court, Dewey Court and Varney Court. These Audits resulted in an Enforcement notice being issued. I have attached the three enforcement notices below.

In 2023 a follow up inspection was carried out at Brouard Court, Dewey Court and Varney Court. The result of the audit confirmed no significant failure to comply with the Regulatory Reform (Fire Safety) Order 2005 (RRO) were found and the premises was deemed broadly compliant. This means that no enforcement action (informal or formal) was required as a result and no notices were issued. I have attached the three audit reports below.

Personal data has been removed from the attached documents under [section 40 of the FOIA – Personal Information](#).

After the Fire incident in 2024 another Fire Safety audit took place on Brouard Court, Dewey Court and Varney Court. These Audits resulted in an Enforcement notice being issued. I have attached the three enforcement notices below.

You can also find them on our website here <https://www.london-fire.gov.uk/community/public-notices/public-notice-detail/?id=8137>

Other materials (including email correspondence and detailed notes), or documents provided to us by the Responsible Person (RP) for the building is exempt from access via the FOIA provisions. We consider these to be exempt under [Section 31 of the FOIA \("law enforcement" – Section 31\(1\)\(g\) combined with 31\(2\) \(a\) and 31\(2\) \(c\)\)](#).

We are of the view that the correct balance between the public interest in building safety and our ongoing regulatory involvement lies in making information about enforcement action available (formal or informal) to those that request it, but in withholding the supporting information and evidence gathered during regulation activities.

We clearly understand that there is public interest and concern about knowing about the fire safety of the buildings in which people live, work or visit however we need to maintain a balance between the public interest in safety and the Brigade's ability to work with responsible persons in a safe space where honest, frank and meaningful discussions can take place. It is important that enforcing authorities are assisted in their investigations if witnesses and those responsible for compliance with regulations are willing to cooperate with the investigation on a voluntary basis and investigators are able to take full contemporaneous notes and enter in discussions (either verbally, or by correspondence) with those involved to enable them to explore all aspects of the case and then arrive at a decision as to the appropriate action to take.

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/>



Fire Safety Audit Report

Audit Information

Audited By [REDACTED]
Audit Completed 6 March 2023

Location summary

File No 92/259154
UPRN 10070015294
Building Name BROUARD COURT
Address BROUARD COURT
 13 ST MARK'S SQUARE
 BROMLEY
 BR2 9YF
Borough Bromley
Use D - Purpose Built Flats >=4 floors
Responsible Team FSD CROY-BROM-SUT-MERT
Station Ground E39 - Bromley
Site Risk Score 4.50
Building Height band 50+
Total Floors 23
Estimated number of sleeping 0
Special Features External Facade

Basement floors 3

Additional detail

Façade inspection report carried out by [REDACTED] of F.I.R.E. Consultancy Ltd dated 14/01/2020. This report and its findings were based on architect drawings and photographs supplied by clerk of works and contractors - no intrusive survey has been carried out. Façade report advises that wooden balconies are subject to a suitable FRA with no other reference within this report. EWS1 supplied given a B1 rating - no remediation required. I contested the EWS1 with [REDACTED] and asked how could he justify no remediation required with the timber balconies assisting fire spread and he stated that the timber treatment meant it was acceptable. The sloped roof of this premises with balconies also seemed to be a 'grey' area as [REDACTED] regarded this as a roof but I suggested it should have been regarded as a wall because of the balconies.

Façade is made up of glass reinforce concrete cladding panels with calcium silicate board, Celotex, Kingspan K15 and mineral wool insulation.

Premises Description

Brouard Court is a PBBF of 23 floors (B3, B2, B1, G+1-19) of 86 general needs flats. Penthouse flat is duplex over floors 18 and 19. Concrete and structural steel construction with concrete floors and a single concrete stair.

All flats have a domestic mains boosted sprinkler suppression system and the basement car park has a commercial sprinkler suppression system. Energy centre on level B2, backup generator with 1200 litres of fuel in B2. Residents car park on B1.

AOV at head of stair tested ok, mechanical extraction in lobbies to flats,

FF lift, wet riser, 24 hour concierge based in adjacent premises. 1 x FF lift and 1 x passenger lift.

Solar PV panels on roof. Bin store accessed externally. Currently no electric car charging points.

Exterior Wall Cladding

Glass, Render system, Brick, Timber/wood, Other

Exterior Wall Insulation

Mineral wool, PUR / PIR Foam, Phenolic foam

Cladding/Insulation details confirmed by Other specialist report

Environmental Risks NONE

Features assisting fire spread NONE

Site Reinspection date

Heritage Building No

Balconies present? Yes

Gas Supply present? Yes

Petroleum redevelopment? No

Known firesetting in area? No

Site lone worker risk

Property Detail (DEFAULT PROPERTY)

Occupier Contact Default Property
Address BROUARD COURT
 13 ST MARK'S SQUARE
 BROMLEY
 BR2 9YF

Responsible team FSD CROY-BROM-SUT-MERT
Occupancy Type Sole Occupier
Property Use D - Purpose Built Flats >=4 floors
Valuation Office R3 - Flats/Mais 4 Flrs and over PB

Original Risk Score **4.50**

Reinspection Date N/A (SAMPLE)

Last Inspection 2 August 2022

Total Capacity 0

Maximum number of people **>100**

Property Size for use Very Large
 10301m² to 12600m²

Environmental Risks NONE

Occupant Mobility Average

Fire Loading Average

Additional detail

Specific lone worker risk

Primary Authority Partnership N/A

Protection Data (SHARED)

Fire Protection & Warning	Adequate
Unwanted fire signals count	0
AFD remote monitoring	No
Smoke ventilation	Mechanical
Covers MOE/Common areas?	Yes
Sprinklers Installed?	Yes
Sprinkler Type	Wet Pipe
Coverage %	90
False activations in past 3 years	0
Fire activations in past 3 years	8
Access for fire-fighting	Average
Water supplies	Average
Special Features	8 sprinkler heads actuated at incident 097773-03072022
# Fire fighting shafts	1
Engineered solution?	YES
Trade off measures?	No
Evacuation type	Defend in place -Stay Put
History of fires?	No

Contacts**Occupier**

Name	Default Property
Address	BROUARD COURT 13 ST MARK'S SQUARE BROMLEY BR2 9YF

Owner/Co-Owner - NEW

Name	Land Sec
Person	[REDACTED]
Position	Director of Fire Safety
Address	Landsec 100 Victoria Street London SW1E 5JL
Telephone	[REDACTED]
Mobile	[REDACTED]
Email	[REDACTED]@landsec.com
URL	landsec.com

Managing Agent

Name	Living City Asset Management
Person	[REDACTED]
Position	Property Manager
Address	LivingCity Asset Management Livingcity Centre 10 Durling Street, Ardwick Green Manchester M12 6FS
Telephone	[REDACTED]
Mobile	[REDACTED]
Email	[REDACTED]
URL	www.livingcity.co.uk

Other relevant contact

Name	LivingCity
Person	[REDACTED]
Position	Building Safety Manager
Address	LivingCity Asset Management Livingcity Centre 10 Durling Street, Ardwick Green Manchester M12 6FS
Telephone	[REDACTED]
Mobile	[REDACTED]
Email	[REDACTED]

Enforcement history**Infringements****Type** Art30 Enforcement**Date** 12 September 2022**Prohibition/Restriction date** N/A**Prosecution Date** N/A**Articles****Article 9 - Risk assessment****SAFETY CRITICAL****Safety Evaluation**

Broadly Compliant

Verbal Advice Given

Observations

New Type 3 FRA carried out by [REDACTED] of Ignis on 13/02/2023. This is a comprehensive document which clearly identifies deficiencies as significant findings and gives timescales for remediation. This FRA is specific to this premises but does reference the façade report and previous FRAs. Identifies stay put strategy for whole of premises except for areas under construction (floors 13-18) which have a sim evac supported by interlinked detection and also connected to the concierge slave alarm panel.

Article 11 - Fire Safety Arrangements**SAFETY CRITICAL****Safety Evaluation**

Broadly Compliant

Verbal Advice Given

Observations

Fire alarm serviced by Reltech Solutions on 15/06/2022 - identified faults remediated on 30/06/2022.

Lifts serviced by Emerald elevators on 11/04/2022

EL serviced by Edmund Services on 01/06/2022 - 3 hour drain down.

Car park mechanical extraction serviced by Fire Design Solutions on 29/09/2021

AOV's serviced by Fire design Solutions on 02/02/2022

Sprinklers and sprinkler pumps serviced by A&F Sprinklers Ltd on 31/03/2022.

Service documents for wet riser not supplied but RP advised they are part of ongoing maintenance contract.

Combustible items removed from riser cupboards.

Location of solar PV AC/DC isolator in adjacent premises identified by signs and information added to grab bag and plans.

Article 11
(continued)

Advised RP that a robust management approach should be taken towards the floors under construction (13-18) to ensure ventilation system and compartmentation remain fully operational.

Article 13 - Detection and warning**SAFETY CRITICAL**
Safety Evaluation
Broadly Compliant**Observations**

Alarm panel located behind concierge desk in adjacent premises showed faults - RP explained that this was due to detector heads being isolated after incident 097773-03072022 but that the system was still fully operational so I have not scored this as deficient.

Wireless interlinked detection installed in areas under construction (floors 13-18) and also connected to slave panel in concierge office.

Detector heads in common parts to actuate AOV's and mechanical extraction - no sounders.

Sampled flat had a category LD2 system - fire strategy (from the architect drawings) identified an LD1 system within flats - suggested RP have a fire strategy carried out on the 'as built' premises.

Article 14 - Emergency routes and exits**SAFETY CRITICAL**
Safety Evaluation
Broadly Compliant**Observations**

GF electric riser cupboard was formed of single skin plasterboard but now offers the required 30 minute protection to the escape route.

Firestopping works in riser cupboards fully certificated - uploaded to file.

Verbal Advice Given

AOV tested at head of stair.

Mechanical extraction tested in GF lobby, and on 13th, 12th and 6th floors - working ok.

Article 15 - Procedures for serious and imminent danger and for danger areas**SAFETY CRITICAL**
Safety Evaluation
Broadly Compliant**Observations**

Fire action notices detailing stay put policy clearly displayed. Contractors on floors 13-18 are aware of the simultaneous evacuation from these areas supported by wireless interlinked detection.

RP advised me that the concierge and security had a 3 minute investigation time before calling the LFB. I asked if this was a realistic time to investigate and discussed the potential dangers of having a single person carrying out investigations because of the potential of an accident. I advised the RP that the concierge/security call the brigade immediately on alarm activation.

Article 17 - Maintenance

SAFETY CRITICAL
Safety Evaluation
Broadly Compliant

Verbal Advice Given

Observations

Self closing device now fitted to flat ■ - RP advised that a full fire door survey is being undertaken and a program of works entered into.
No other deficiencies were identified under this article.

Article 21 - Training

SAFETY CRITICAL
Safety Evaluation
Broadly Compliant

Observations

No staff positioned within Brouard Court - concierge based in adjacent premises react to alarm activations.
RP advised that concierge receive basic fire safety training - no documentation seen.

Article 8 - General fire precautions

Safety Evaluation
Broadly Compliant

Verbal Advice Given

Observations

Fire stopping works now complete and certificated.

Significant findings of latest FRA are still within timescale for remediation.

Article 10 - Principles of prevention to be applied

Safety Evaluation
Not Applicable

Observations
None

Article 12 - Elimination or reduction of risks from dangerous substances

Safety Evaluation
Not Applicable

Observations
None

Article 13 - Fire Fighting Equipment

Safety Evaluation
Not Applicable

Observations
None

Article 16 - Measures for dealing with dangerous substances affecting general fire precautions

Safety Evaluation
Not Applicable

Observations
None

Article 18 - Safety assistance

Safety Evaluation	Observations
Not Applicable	None

Article 19 - Provision of information to employees

Safety Evaluation	Observations
Not Applicable	None

Article 20 - Provision of information to employers and the self employed from outside undertakings

Safety Evaluation	Observations
Not Applicable	None

Article 22 - Co-operation and co-ordination

Safety Evaluation	Observations
Not Applicable	None

Article 23 - General duties of employees at work

Safety Evaluation	Observations
Not Applicable	None

Article 37 - Fire fighters switches for luminous tube signs

Safety Evaluation	Observations
Not Applicable	None

Article 38 - Maintenance of measures provided for protection of fire fighters

SAFETY CRITICAL Safety Evaluation	Observations
Broadly Compliant	FF lift tested ok.

Article 24 - Power to make regulations

Safety Evaluation	Observations
Not Applicable	None

Article 27 - Powers of inspectors

Safety Evaluation	Observations
Not Applicable	None

Article 29 - Current alterations notices

Safety Evaluation	Observations
Not Applicable	None

Article 30 - Current enforcement notices

Safety Evaluation	Observations
Not Applicable	None

Article 31 - Current prohibition notices

Safety Evaluation	Observations
Not Applicable	None

Article 32 - Offences

Safety Evaluation	Observations
Not Applicable	None

Overall safety standard

Broadly Compliant

Management compliance level

Management Compliance Level	1 - Well above average
Initial Expectation	Verbal action
Considered EMM?	Yes
Confirmed Action	Verbal action

Audit Conclusion**Date audit carried out**

27/02/2023

Time of audit

10:30

Reason for audit;

EN follow up inspection - EN expired on 27/02/2023

Conclusion

PBBF and FSGIN213

Extent of premises audited

Deficiencies identified in the EN were checked for compliance.

AOV at head of stair tested ok. Mechanical extraction tested ok on floors 13, 12, 6 and GF lobby.

Justification of audit outcome

EN follow up carried out by [REDACTED] on 27/02/2023 accompanied by [REDACTED] from U and I and [REDACTED] from Living City.

All items on the EN have now been complied with and relevant documents supplied and uploaded to the portal.

Verbal Advice Given

None recorded

Other Authorities to notify

None

Weeks to Complete Work

N/A

Specific instructions for Admin to Action

Please make BSG aware as Land Sec are in a PAP with LFB.

Admin please send EN full compliance letter to

Company secretary, Cathedral (Bromley) Limited, 7a Howick Place, London, United Kingdom, SW1P 1DZ

Cc Company Secretary, Living Asset Management, 10 Durling street, Ardwick Green, Manchester, M12 6FS

and cc by email [REDACTED] and [REDACTED].com and [REDACTED]

Compliance calculation & signature

Compliance Level	1 - Well above average
Property Risk Group	E - High Rise Residential Building (HRRB specific)
Life Risk	-6.1
Actual Risk Score	4.24
Risk Score	4.25

Audit Timings

Audit Duration
120

Travel Time
120

Post Audit Processing Duration
240



Fire Safety Audit Report

Audit Information

Audited By [REDACTED]
Audit Completed 27 April 2023

Location summary

File No 92/259152
UPRN 10070015189
Building Name DEWEY COURT
Address DEWEY COURT
 7 ST MARK'S SQUARE
 BROMLEY
 BR2 9UZ
Borough Bromley
Use D - Purpose Built Flats >=4 floors
Responsible Team FSD CROY-BROM-SUT-MERT
Station Ground E39 - Bromley
Site Risk Score 4.50
Building Height band 25-30
Total Floors 12 **Basement floors** 3
Estimated number of sleeping 0
Special Features

Additional detail

Façade inspection report carried out by [REDACTED] of F.I.R.E. Consultancy Ltd dated 14/01/2020. This report and its findings were based on architect drawings and photographs supplied by clerk of works and contractors - no intrusive survey has been carried out. Façade report advises that wooden balconies are subject to a suitable FRA with no other reference within this report. EWS1 supplied given a B1 rating - no remediation required. I contested the EWS1 with [REDACTED] and asked how could he justify no remediation required with the timber balconies assisting fire spread and he stated that the timber treatment meant it was acceptable. The sloped roof of this premises with balconies also seemed to be a 'grey' area as [REDACTED] regarded this as a roof but it has been suggested it should have been regarded as a wall because of the balconies. Façade is made up of glass reinforce concrete cladding panels with calcium silicate board, Celotex, Kingspan K15 and mineral wool insulation.

Premises Description

Dewey Court is a PBBF of 12 floors (B3, B2, B1, G+1-8) of 37 general needs flats. Concrete and structural steel construction with concrete floors and a single concrete stair. All flats have a domestic mains boosted sprinkler suppression system and the basement car park has a commercial sprinkler suppression system. Energy centre on level B2, backup generator with 1200 litres of fuel in B2. Residents car park on B1. AOV at head of stair tested ok, mechanical extraction in lobbies to flats, FF lift, wet riser, 24 hour concierge based in adjacent premises. 1 x FF lift

and 1 x passenger lift. Solar PV panels on roof. Bin store accessed externally. Currently no electric car charging points

Exterior Wall Cladding

Glass, Render system, Brick, Timber/wood, Other

Exterior Wall Insulation

Mineral wool, PUR / PIR Foam, Phenolic foam

Cladding/Insulation details confirmed by Other specialist report

Environmental Risks NONE

Features assisting fire spread NONE

Site Reinspection date

Heritage Building No

Balconies present? Yes

Gas Supply present? Yes

Petroleum redevelopment? No

Known firesetting in area? No

Site lone worker risk no known risk

Property Detail (DEFAULT PROPERTY)

Occupier Contact Default Property

Address DEWEY COURT
7 ST MARK'S SQUARE
BROMLEY
BR2 9UZ

Responsible team FSD CROY-BROM-SUT-MERT

Occupancy Type Sole Occupier

Property Use D - Purpose Built Flats >=4 floors

Valuation Office R3 - Flats/Mais 4 Flrs and over PB

Original Risk Score **4.50**

Reinspection Date N/A (SAMPLE)

Last Inspection 17 August 2022

Total Capacity 0

Maximum number of people **>100**

Property Size for use Very Large
10301m² to 12600m²

Environmental Risks NONE

Occupant Mobility Average

Fire Loading Average

Additional detail

Specific lone worker risk no known risk

Primary Authority Partnership N/A

Protection Data (SHARED)

Fire Protection & Warning	Adequate
Unwanted fire signals count	0
AFD remote monitoring	No
Smoke ventilation	Mechanical
Covers MOE/Common areas?	Yes
Sprinklers Installed?	Yes
Sprinkler Type	Wet Pipe
Coverage %	90
False activations in past 3 years	0
Fire activations in past 3 years	0
Access for fire-fighting	Average
Water supplies	Average
Special Features	
# Fire fighting shafts	0
Engineered solution?	YES
Trade off measures?	No
Evacuation type	Defend in place -Stay Put
History of fires?	No

Contacts**Occupier**

Name	Default Property
Address	DEWEY COURT 7 ST MARK'S SQUARE BROMLEY BR2 9UZ

Owner/Co-Owner - NEW

Name	Land Sec
Person	
Position	Director of Fire Safety
Address	Landsec 100 Victoria Street London SW1E 5JL
Telephone	
Mobile	
Email	

Managing Agent

Name	Living City Asset Management
Person	
Position	Property Manager
Address	Livingcity Centre 10 Durling Street Ardwick Green Manchester M12 6FS
Telephone	
Mobile	
Email	

Other relevant contact

Name	Living City Asset Management
Person	[REDACTED]
Position	Building Safety Manager
Address	Livingcity Centre 10 Durling Street Ardwick Green Manchester M12 6FS
Telephone	[REDACTED]
Mobile	[REDACTED]
Email	[REDACTED]

Enforcement history**Infringements****Type** Art30 Enforcement**Date** 12 October 2022**Prohibition/Restriction date** N/A**Prosecution Date** N/A**Articles****Article 9 - Risk assessment****SAFETY CRITICAL**
Safety Evaluation
Broadly Compliant**Observations**

FRA dated 16/02/2022 carried out by [REDACTED] of Ark Workplace Risk. Recommended period for review given as 12 months. FRA not suitable and sufficient as it

- is not specific to a single premises and covers multiple blocks with different risks.
- incorrectly identifies a simultaneous evacuation strategy is in place and does not identify the correct emergency strategy based on the findings of the fire risk assessment. The premises has a stay put emergency strategy in place.
- does not consider the potential risks to relevant persons posed by the external façade and timber located around boundaries. The risk assessor makes no reference to the façade inspection report dated 14/01/2022 - see article 11
- did not identify that front doors to sampled flat [REDACTED] was not fitted with a self closing device.

New FRA being carried out by [REDACTED] of Surety Fire Solutions Ltd and due to be carried out week beginning 25/07/2022

Post EN follow up

New Type 3 FRA carried out by [REDACTED] of Ignis on 23/11/2022.

This is a comprehensive document which clearly identifies deficiencies as significant findings and gives timescales for remediation. This FRA is specific to this premises but does reference the façade report and previous FRAs. Identifies stay put strategy for whole of premises.

Article 11 - Fire Safety Arrangements

SAFETY CRITICAL
Safety Evaluation
Broadly Compliant

Observations

Fire alarm serviced by Reltech Solutions on 15/06/2022 - identified faults remediated on 30/06/2022.

Lifts serviced by Emerald elevators on 11/04/2022

EL serviced by Edmund Services on 01/06/2022 - 3 hour drain down.

Car park mechanical extraction serviced by Fire Design Solutions on

29/09/2021 AOV's serviced by Fire design Solutions on 02/02/2022

Sprinklers and sprinkler pumps serviced by A&F Sprinklers Ltd on 31/03/2022.

Service documents for wet riser not supplied but RP advised they are part of ongoing maintenance contract.

The erection of signs to indicate the location of sprinkler isolator valves and solar PV AC/DC isolators has not been organised.

Concierge are to carry out walk rounds of all floors twice a day, on finding items in common parts they will ask owner to remove or will remove themselves.

Post EN follow up

Combustible items removed from riser cupboards.

Location of solar PV AC/DC isolator in adjacent premises identified by signs and information added to grab bag and plans.

Article 13 - Detection and warning

SAFETY CRITICAL
Safety Evaluation
Broadly Compliant

Observations

Alarm panel located behind concierge desk in adjacent premises showed faults - RP explained that this was due to detector heads being isolated in Brouard Court after incident 097773-03072022 but that the system was still fully operational so I have not scored this as deficient.

Detector heads in common parts to actuate AOV's and mechanical extraction - no sounders. Sampled flats had a category LD2 system

Article 14 - Emergency routes and exits

SAFETY CRITICAL
Safety Evaluation
Broadly Compliant

Observations

At time of audit all corridors and means of escape were clear.

Sampled flats; [REDACTED]

Flats front doors [REDACTED] was missing self closing device.

Flat [REDACTED] did not close fully into its frame under own power.

AOV at head of stair tested ok. Corridors to flats had extended travel distances of 14 metres - this is a permissible deviation as flats have a sprinkler suppression system.

Lobby Door on the 4th floor leading to staircase missing intumescent strips.

Post EN follow up.

All remedial works have been carried out.

RP advised that a full fire door survey is being undertaken and a program of works entered into.

Article 15 - Procedures for serious and imminent danger and for danger areas

SAFETY CRITICAL
Safety Evaluation
Broadly Compliant

Observations

Fire action notices detailing stay put policy clearly displayed. RP has advised that the concierge and security had a 3 minute investigation time before calling the LFB. It was asked if this was a realistic time to investigate and discussed the potential dangers of having a single person carrying out investigations because of the potential of an accident. It has been advised the RP that the concierge/security call the brigade immediately on alarm activation.

Article 17 - Maintenance

SAFETY CRITICAL
Safety Evaluation
Broadly Compliant

Observations

Flats front doors ■ was missing self closing device.
Flat ■ did not close fully into its frame under own power.
Fire alarm serviced by Reltech Solutions on 15/06/2022 - identified faults remediated on 30/06/2022.
Lifts serviced by Emerald elevators on 11/04/2022
EL serviced by Edmund Services on 01/06/2022 - 3 hour drain down.
Car park mechanical extraction serviced by Fire Design Solutions on 29/09/2021 AOV's serviced by Fire design Solutions on 02/02/2022
Sprinklers and sprinkler pumps serviced by A&F Sprinklers Ltd on 31/03/2022.
Service documents for wet riser not supplied but RP advised they are part of ongoing maintenance contract.
Lobby Door on the 4th floor leading to staircase missing intumescent strips.

Post EN follow up

All remedial works have been carried out and completed.
RP advised that a full fire door survey is being undertaken and a program of works entered into.

Article 21 - Training

SAFETY CRITICAL
Safety Evaluation
Broadly Compliant

Observations

No staff positioned within Varney Court - concierge based in adjacent premises react to alarm activations
Concierge carry out an online fire safety course.
No training in how to use fire extinguishers is given, but they are not expected to use them.

Article 8 - General fire precautions

Safety Evaluation
Broadly Compliant

Observations

Visual inspection of common parts should no obvious signs of compartment breaches.

Article 10 - Principles of prevention to be applied

Safety Evaluation	Observations
Not Applicable	None

Article 12 - Elimination or reduction of risks from dangerous substances

Safety Evaluation	Observations
Not Applicable	None

Article 13 - Fire Fighting Equipment

Safety Evaluation	Observations
Not Applicable	None

Article 16 - Measures for dealing with dangerous substances affecting general fire precautions

Safety Evaluation	Observations
Not Applicable	None

Article 18 - Safety assistance

Safety Evaluation	Observations
Not Applicable	None

Article 19 - Provision of information to employees

Safety Evaluation	Observations
Not Applicable	None

Article 20 - Provision of information to employers and the self employed from outside undertakings

Safety Evaluation	Observations
Not Applicable	None

Article 22 - Co-operation and co-ordination

Safety Evaluation	Observations
Not Applicable	None

Article 23 - General duties of employees at work

Safety Evaluation	Observations
Not Applicable	None

Article 37 - Fire fighters switches for luminous tube signs

Safety Evaluation	Observations
Not Applicable	None

Article 38 - Maintenance of measures provided for protection of fire fighters

SAFETY CRITICAL Safety Evaluation	Observations
Broadly Compliant	Wet riser installed in all buildings of the estate, these are maintained through a service programme. FF lift present.

Article 24 - Power to make regulations

Safety Evaluation	Observations
Not Applicable	None

Article 27 - Powers of inspectors

Safety Evaluation	Observations
Not Applicable	None

Article 29 - Current alterations notices

Safety Evaluation	Observations
Not Applicable	None

Article 30 - Current enforcement notices

Safety Evaluation	Observations
Not Applicable	None

Article 31 - Current prohibition notices

Safety Evaluation	Observations
Not Applicable	None

Article 32 - Offences

Safety Evaluation	Observations
Not Applicable	None

Overall safety standard

Broadly Compliant

Management compliance level

Management Compliance Level	1 - Well above average
Initial Expectation	Verbal action
Considered EMM?	Yes
Confirmed Action	Verbal action

Audit Conclusion**Date audit carried out**

30/3/23

Time of audit

09:00

Reason for audit;

EN follow up inspection

Conclusion

PBBF and FSGIN213

Extent of premises audited

Deficiencies identified in the EN were checked for compliance.

All final exits walked.

Justification of audit outcome

EN follow up carried out by [REDACTED] on 30/03/2023 accompanied by [REDACTED] from U and I. All items on the EN have now been complied with and relevant documents supplied and uploaded to the portal.

Verbal Advice Given

None given

Other Authorities to notify

None

Weeks to Complete Work

N/A

Specific instructions for Admin to Action

Please make BSG aware as Land Sec are in a PAP with LFB.

Admin please send EN full compliance letter to

Company secretary, Cathedral (Bromley) Limited, 7a Howick Place, London, United Kingdom, SW1P 1DZ
Cc Company Secretary, Living Asset Management, 10 Durling street, Ardwick Green, Manchester, M12 6FS
and cc by email [REDACTED] and [REDACTED] and [REDACTED]

Compliance calculation & signature

Compliance Level	1 - Well above average
Property Risk Group	E - High Rise Residential Building (HRRB specific)
Life Risk	-6.1
Actual Risk Score	4.24
Risk Score	4.25

Audit Timings

Audit Duration
60

Travel Time
45

Post Audit Processing Duration
150



Fire Safety Audit Report

Audit Information

Audited By [REDACTED]
Audit Completed 27 April 2023

Location summary

File No 92/259153
UPRN 10070015229
Building Name VARNEY COURT
Address VARNEY COURT
 10 ST MARK'S SQUARE
 BROMLEY
 BR2 9YD
Borough Bromley
Use D - Purpose Built Flats >=4 floors
Responsible Team FSD CROY-BROM-SUT-MERT
Station Ground E39 - Bromley
Site Risk Score 4.50
Building Height band 25-30
Total Floors 16 **Basement floors** 3
Estimated number of sleeping 0
Special Features

Additional detail

Façade inspection report carried out by [REDACTED] of F.I.R.E. Consultancy Ltd dated 14/01/2020. This report and its findings were based on architect drawings and photographs supplied by clerk of works and contractors - no intrusive survey has been carried out. Façade report advises that wooden balconies are subject to a suitable FRA with no other reference within this report. EWS1 supplied given a B1 rating - no remediation required. I contested the EWS1 with [REDACTED] and asked how could he justify no remediation required with the timber balconies assisting fire spread and he stated that the timber treatment meant it was acceptable. The sloped roof of this premises with balconies also seemed to be a 'grey' area as [REDACTED] regarded this as a roof but it has been suggested it should have been regarded as a wall because of the balconies. Façade is made up of glass reinforce concrete cladding panels with calcium silicate board, Celotex, Kingspan K15 and mineral wool insulation.

Premises Description

Varney Court is a PBBF of 16 floors (B3, B2, B1, G+1-12) of 86 general needs flats. Penthouse flat is duplex over floors 18 and 19. Concrete and structural steel construction with concrete floors and a single concrete stair. All flats have a domestic mains boosted sprinkler suppression system and the basement car park has a commercial sprinkler suppression system. Energy centre on level B2, backup generator with 1200 litres of fuel in B2. Residents car park on B1. AOV at head of stair tested ok, mechanical extraction in lobbies to flats, Fire Safety Audit Page 1 of 14 PDF Generated 2 August 2022 PDF Generated 2 August 2022 FF

lift, wet riser, 24 hour concierge based in adjacent premises. 1 x FF lift and 1 x passenger lift. Solar PV panels on roof. Bin store accessed externally. Currently no electric car charging points.

Exterior Wall Cladding

Glass, Render system, Brick, Timber/wood, Other

Exterior Wall Insulation

Mineral wool, PUR / PIR Foam, Phenolic foam

Cladding/Insulation details confirmed by Other specialist report

Environmental Risks NONE

Features assisting fire spread NONE

Site Reinspection date

Heritage Building No

Balconies present? Yes

Gas Supply present? Yes

Petroleum redevelopment? No

Known firesetting in area? No

Site lone worker risk no known risk.

Property Detail (DEFAULT PROPERTY)

Occupier Contact Default Property
Address VARNEY COURT
 10 ST MARK'S SQUARE
 BROMLEY
 BR2 9YD

Responsible team FSD CROY-BROM-SUT-MERT
Occupancy Type Sole Occupier
Property Use D - Purpose Built Flats >=4 floors
Valuation Office R3 - Flats/Mais 4 Flrs and over PB
Original Risk Score 4.50
Reinspection Date N/A (SAMPLE)
Last Inspection 17 August 2022
Total Capacity 0
Maximum number of people >100
Property Size for use Very Large
 10301m² to 12600m²

Environmental Risks NONE
Occupant Mobility Average
Fire Loading Average

Additional detail

Specific lone worker risk no known risk.
Primary Authority Partnership N/A

Protection Data (SHARED)

Fire Protection & Warning	Adequate
Unwanted fire signals count	0
AFD remote monitoring	No
Smoke ventilation	Mechanical
Covers MOE/Common areas?	Yes
Sprinklers Installed?	Yes
Sprinkler Type	Wet Pipe
Coverage %	90
False activations in past 3 years	0
Fire activations in past 3 years	0
Access for fire-fighting	Average
Water supplies	Average
Special Features	
# Fire fighting shafts	0
Engineered solution?	YES
Trade off measures?	No
Evacuation type	Defend in place -Stay Put
History of fires?	No

Contacts**Occupier**

Name	Default Property
Address	VARNEY COURT 10 ST MARK'S SQUARE BROMLEY BR2 9YD

Owner/Co-Owner - NEW

Name	Land Sec
Person	
Position	Director of Fire Safety
Address	Landsec 100 Victoria Street London SW1E 5JL
Telephone	
Mobile	
Email	

Managing Agent

Name	Living City Asset Management
Person	
Position	Property Manager
Address	Living City Centre 10 Durling Street Ardwick Green Manchester M12 6FS
Telephone	
Mobile	
Email	

Other relevant contact

Name	Living City Asset Management
Person	[REDACTED]
Position	Building Safety Manager
Address	Living City Centre 10 Durling Street Ardwick Green Manchester M12 6FS
Telephone	[REDACTED]
Mobile	[REDACTED]
Email	[REDACTED]

Enforcement history**Infringements****Type** Art30 Enforcement**Date** 12 October 2022**Prohibition/Restriction date** N/A**Prosecution Date** N/A**Articles****Article 9 - Risk assessment**

SAFETY CRITICAL
Safety Evaluation
Broadly Compliant

Observations

FRA dated 16/02/2022 carried out by [REDACTED] of Ark Workplace Risk. Recommended period for review given as 12 months. FRA not suitable and sufficient as it

- is not specific to a single premises and covers multiple blocks with different risks.
- incorrectly identifies a simultaneous evacuation strategy is in place and does not identify the correct emergency strategy based on the findings of the fire risk assessment. The premises has a stay put emergency strategy in place.
- does not consider the potential risks to relevant persons posed by the external façade and timber located around boundaries. The risk assessor makes no reference to the façade inspection report dated 14/01/2022 - see article 11
- does not contain any significant findings - did not identify that plastic pipes running vertically from the energy centre were not fitted with intumescent collars.
- did not identify that front doors to sampled flat [REDACTED] [REDACTED] were not fitted with a self closing devices.

New FRA being carried out by [REDACTED] of Surety Fire Solutions Ltd and due to be carried out week beginning 25/07/20

Post EN follow up

New Type 3 FRA carried out by [REDACTED] of Ignis on 23/01/2022. This is a comprehensive document which clearly identifies deficiencies as significant findings and gives timescales for remediation. This FRA is specific to this premises but does reference the façade report and previous FRAs. Identifies stay put strategy for whole of premises

Article 11 - Fire Safety Arrangements

SAFETY CRITICAL
Safety Evaluation
Broadly Compliant

Observations

Fire alarm serviced by Reltech Solutions on 15/06/2022 - identified faults remediated on 30/06/2022.

Lifts serviced by Emerald elevators on 11/04/2022

EL serviced by Edmund Services on 01/06/2022 - 3 hour drain down.

Car park mechanical extraction serviced by Fire Design Solutions on

29/09/2021 AOV's serviced by Fire design Solutions on 02/02/2022

Sprinklers and sprinkler pumps serviced by A&F Sprinklers Ltd on 31/03/2022.

Service documents for wet riser not supplied but RP advised they are part of ongoing maintenance contract.

The erection of signs to indicate the location of sprinkler isolator valves and solar PV AC/DC isolators has not been organised.

Concierge are to carry out walk rounds of all floors twice a day, on finding items in common parts they will ask owner to remove or will remove themselves.

Post EN follow up

Combustible items removed from riser cupboards.

Location of solar PV AC/DC isolator in adjacent premises identified by signs and information added to grab bag and plans.

Article 13 - Detection and warning

SAFETY CRITICAL
Safety Evaluation
Broadly Compliant

Observations

Alarm panel located behind concierge desk in adjacent premises showed faults - RP explained that this was due to detector heads being isolated in Brouard Court after incident 097773-03072022 but that the system was still fully operational so I have not scored this as deficient.

Detector heads in common parts to actuate AOV's and mechanical extraction - no sounders. Sampled flats had a category LD2 system

Article 14 - Emergency routes and exits

SAFETY CRITICAL
Safety Evaluation
Broadly Compliant

Observations

At time of audit all corridors and means of escape were clear.

Sampled flats [REDACTED] and [REDACTED]

Flats front doors [REDACTED] and [REDACTED] were missing self closing devices.

Flat [REDACTED] did not close fully into its frame under own power.

AOV at head of stair tested ok. Corridors to flats had extended travel distances of 14 metres - this is a permissible deviation as flats have a sprinkler suppression system.

Post EN follow up

All remedial works carried out and completed.

RP advised that a full fire door survey is being undertaken and a program of works entered into.

Article 15 - Procedures for serious and imminent danger and for danger areas

SAFETY CRITICAL
Safety Evaluation
Broadly Compliant

Observations

Fire action notices detailing stay put policy clearly displayed. RP has advised that the concierge and security had a 3 minute investigation time before calling the LFB. It was asked if this was a realistic time to investigate and discussed the potential dangers of having a single person carrying out investigations because of the potential of an accident. It has been advised the RP that the concierge/security call the brigade immediately on alarm activation.

Article 17 - Maintenance

SAFETY CRITICAL
Safety Evaluation
Broadly Compliant

Observations

Flats front doors ■ and ■ were missing self closing devices.
Flat ■ did not close fully into its frame under own power.
Fire alarm serviced by Reltech Solutions on 15/06/2022 - identified faults remediated on 30/06/2022.
Lifts serviced by Emerald elevators on 11/04/2022
EL serviced by Edmund Services on 01/06/2022 - 3 hour drain down.
Car park mechanical extraction serviced by Fire Design Solutions on 29/09/2021 AOV's serviced by Fire design Solutions on 02/02/2022
Sprinklers and sprinkler pumps serviced by A&F Sprinklers Ltd on 31/03/2022.
Service documents for wet riser not supplied but RP advised they are part of ongoing maintenance contract.

Post EN follow up

All remedial works carried out and completed.

RP advised that a full fire door survey is being undertaken and a program of works entered into.

Article 21 - Training

SAFETY CRITICAL
Safety Evaluation
Broadly Compliant

Observations

No staff positioned within Varney Court - concierge based in adjacent premises react to alarm activations
Concierge carry out an online fire safety course.
No training in how to use fire extinguishers is given, but they are not expected to use them.

Article 8 - General fire precautions

Safety Evaluation
Broadly Compliant

Observations

Pipes leading horizontally from the energy centre into the car park passed through a compartment wall had gaps around them. Plastic pipes running vertically from the energy centre are not fitted with intumescent collars.

Post EN follow up

All fire stopping works have been carried out, visual inspection shows all work is certified.

Article 10 - Principles of prevention to be applied

Safety Evaluation	Observations
Not Applicable	None

Article 12 - Elimination or reduction of risks from dangerous substances

Safety Evaluation	Observations
Not Applicable	None

Article 13 - Fire Fighting Equipment

Safety Evaluation	Observations
Not Applicable	None

Article 16 - Measures for dealing with dangerous substances affecting general fire precautions

Safety Evaluation	Observations
Not Applicable	None

Article 18 - Safety assistance

Safety Evaluation	Observations
Not Applicable	None

Article 19 - Provision of information to employees

Safety Evaluation	Observations
Not Applicable	None

Article 20 - Provision of information to employers and the self employed from outside undertakings

Safety Evaluation	Observations
Not Applicable	None

Article 22 - Co-operation and co-ordination

Safety Evaluation	Observations
Not Applicable	None

Article 23 - General duties of employees at work

Safety Evaluation	Observations
Not Applicable	None

Article 37 - Fire fighters switches for luminous tube signs

Safety Evaluation	Observations
Not Applicable	None

Article 38 - Maintenance of measures provided for protection of fire fighters

SAFETY CRITICAL Safety Evaluation	Observations
Broadly Compliant	Wet riser installed in all buildings of the estate, these are maintained through a service programme. FF lift present.

Article 24 - Power to make regulations

Safety Evaluation	Observations
Not Applicable	None

Article 27 - Powers of inspectors

Safety Evaluation	Observations
Not Applicable	None

Article 29 - Current alterations notices

Safety Evaluation	Observations
Not Applicable	None

Article 30 - Current enforcement notices

Safety Evaluation	Observations
Not Applicable	None

Article 31 - Current prohibition notices

Safety Evaluation	Observations
Not Applicable	None

Article 32 - Offences

Safety Evaluation	Observations
Not Applicable	None

Overall safety standard

Broadly Compliant

Management compliance level

Management Compliance Level	1 - Well above average
Initial Expectation	Verbal action
Considered EMM?	Yes
Confirmed Action	Verbal action

Audit Conclusion**Date audit carried out**

30/3/23

Time of audit

12:00

Reason for audit;

EN follow up inspection

Conclusion

PBBF and FSGIN213

Extent of premises audited

Deficiencies identified in the EN were checked for compliance.

All final exits walked.

Justification of audit outcome

EN follow up carried out by [REDACTED] on 30/03/2023 accompanied by [REDACTED] from U and I.

All items on the EN have now been complied with and relevant documents supplied and uploaded to the portal.

Verbal Advice Given

None given

Other Authorities to notify

None

Weeks to Complete Work

N/A

Specific instructions for Admin to Action

Please make BSG aware as Land Sec are in a PAP with LFB.

Admin please send EN full compliance letter to

Company secretary, Cathedral (Bromley) Limited, 7a Howick Place, London, United Kingdom, SW1P 1DZ
Cc Company Secretary, Living Asset Management, 10 Durling street, Ardwick Green, Manchester, M12 6FS
and cc by email [REDACTED] and [REDACTED] and [REDACTED]

Compliance calculation & signature

Compliance Level	1 - Well above average
Property Risk Group	E - High Rise Residential Building (HRRB specific)
Life Risk	-6.1
Actual Risk Score	4.24
Risk Score	4.25

Audit Timings

Audit Duration
60

Travel Time
10

Post Audit Processing Duration
150

The Company Secretary
Cathedral (Bromley) Limited
100 Victoria Street
London SW1E 5JL

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

Date 14 June 2023
Our Ref 92/259154/

Dear Sir/Madam

REGULATORY REFORM (FIRE SAFETY) ORDER 2005 (as amended)

Premises: Brouard Court, 13 St Mark's Square, Bromley BR2 9YF

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 (as amended) (The Order) in London.

Further to the recent inspection by an authorised officer I confirm that the works specified in the Enforcement Notice dated **12 September 2022**, issued by the Commissioner in respect of the above mentioned premises have been satisfactorily completed within the specified time limit. The Enforcement Notice has been complied with and at the time of the inspection the premises were deemed to comply with the above Order.

Should the circumstances change in the future affecting the risk to persons in case of fire, a further risk assessment of the premises should be carried out and the findings addressed. The law requires that if you have:

- 5 or more employees,
- a licence under an enactment in force in respect of the premises, or
- an alterations notice in force requiring such,

your risk assessment should be recorded and made available for future inspection in order to ensure continued compliance with the Order.

Any queries regarding this letter should be addressed to the person named below. If you are dissatisfied in any way with the response given, please ask to speak to the Team Leader quoting our reference.

Yours faithfully,

[Redacted]

for Assistant Commissioner (Fire Safety)

Directorate of Operations

FSR-AdminSupport@london-fire.gov.uk

Reply to Inspecting Officer [Redacted]

Direct T 020 8555 1200 [Redacted]

Cc: The Company Secretary, Living Asset Management, 10 Durling street, Ardwick Green
Manchester M12 6FS

[Redacted]

[Redacted]

[Redacted]

The Company Secretary
Cathedral (Bromley) Limited
100 Victoria Street
London
SW1E 5JL

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

Date 6 June 2023
Our Ref 92/259152

Dear Sir/Madam

REGULATORY REFORM (FIRE SAFETY) ORDER 2005 (as amended)

Premises: Dewey Court, 7 St. Mark's Square, Bromley, BR2 9UZ

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 (as amended) (The Order) in London.

Further to the recent inspection by an authorised officer I confirm that the works specified in the Enforcement Notice dated **12 October 2022**, issued by the Commissioner in respect of the above mentioned premises have been satisfactorily completed within the specified time limit. The Enforcement Notice has been complied with and at the time of the inspection the premises were deemed to comply with the above Order.

Should the circumstances change in the future affecting the risk to persons in case of fire, a further risk assessment of the premises should be carried out and the findings addressed. The law requires that if you have:

- 5 or more employees,
- a licence under an enactment in force in respect of the premises, or
- an alterations notice in force requiring such,

your risk assessment should be recorded and made available for future inspection in order to ensure continued compliance with the Order.

Any queries regarding this letter should be addressed to the person named below. If you are dissatisfied in any way with the response given, please ask to speak to the Team Leader quoting our reference.

Yours faithfully

for Assistant Commissioner (Fire Safety)

Directorate of Operations

FSR-AdminSupport@london-fire.gov.uk

Reply to Inspecting Officer

Direct T 020 8555 1200

Cc: The Company Secretary, Living City Asset Management Ltd, 10 Durling Street, Ardwick Green,
Manchester, M12 6FS

@uandi.co.uk

@landsec.com

@livingcity.co.uk

The Company Secretary
Cathedral (Bromley) Limited
7a Howick Place
London
SW1P 1DZ

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

Date 12 October 2022
Our Ref 92/259152/

ENFORCEMENT NOTICE

**Notice requiring steps to be taken under Article 30 of the
Regulatory Reform (Fire Safety) Order 2005 (as amended)**

TO:

Name: **Cathedral (Bromley) Limited**

Address: **7a Howick Place, London, SW1P 1DZ**

Concerning Premises at: **Dewey Court, 7 St. Mark's Square, Bromley, BR2 9UZ**

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 (as amended), hereafter referenced as ('The Order') in London.

I [REDACTED] Assistant Commissioner (Fire Safety) on behalf of the Commissioner hereby give you notice that the Commissioner is of the opinion that you, as a person being under an obligation to do so, have failed to comply with the duties placed upon you by the Regulatory Reform (Fire Safety) Order 2005 (as amended) (The Order) in respect of the above named premises, the relevant persons who may be on the premises or who may be affected by a fire on the premises.

The matters which, in the opinion of the Commissioner, constitute the failure(s) to comply with The Order are specified in the Schedule of Fire Safety Observations attached to this notice. The Commissioner is further of the opinion that the steps identified in the schedule to this notice must be taken to remedy the specified failure(s) and comply with The Order.

The relevant extracts of the legislation are attached.

There may be suitable alternative safety measures, to those detailed in this notice that would meet the requirements of The Order. If you wish to propose or discuss any alternative measures you should contact the person named below, before you take any action, to ensure that your proposed measures will be deemed satisfactory by the Commissioner.

The steps must be taken by **29 March 2023** (or such extension if granted by the Commissioner).

Unless the steps identified in the schedule attached to this notice have been complied with, or such other steps are taken to remedy the failures in consultation with the Commissioner, you will be deemed not to have complied with this notice.

If you fail to comply with the requirements of this notice, you may have committed an offence. The Commissioner may consider a prosecution against you. If you are found guilty, you will be liable to a fine or imprisonment (or both).

You have the right to appeal against this notice, by way of complaint for an order, to the Clerk to the Court of the Magistrates' Court acting for the petty sessions area in which your premises is located. If you wish to bring an appeal, you must do so within 21 days of the date this notice is served on you. The Magistrates' Court Act 1980 will apply to the proceedings. The bringing of an appeal will suspend the operation of this enforcement notice. An appeal against an enforcement notice served under Article 30 of the Regulatory Reform (Fire Safety) Order 2005 (as amended), may be brought on any grounds. These may include that you are aggrieved:

- a) by anything mentioned in the notice with respect to the premises concerned, or the relevant persons as defined by The Order, being a step which must be taken in order to comply with The Order; or
- b) by the period allowed by such a notice for the taking of any steps mentioned in it.

If at any time you wish to discuss the requirements of this notice, or are experiencing difficulty in carrying out the work, please contact **Inspecting Officer** [REDACTED]

Signed:

[REDACTED]

Dated: 12 October 2022

Assistant Commissioner
(The Officer appointed for the purpose)

The contents of this notice are without prejudice to any requirements or recommendations that may be made by the Commissioner under the Petroleum (Consolidation) Regulations 2014, or either the local authority or the Health and Safety Executive under any other Act of Parliament or Regulation for which they are the enforcing authority. Approval will normally be required under the Building Regulations for any building works for which you are obliged to notify the local Building Control Officer under the Building Regulations 2010 or an Approved Inspector under the Building (Approved Inspectors etc) Regulations, 2010.

Reply to Inspecting Officer [REDACTED]
Direct T 020 8555 1200 [REDACTED]
FSR-AdminSupport@london-fire.gov.uk

Encl: FS03_01a, FS03_01b, FS03_06

Cc: The Company Secretary, Living City Asset Management Limited
10 Durling Street, Manchester, M12 6FS

██████████ [@livingcity.co.uk](mailto:██████████@livingcity.co.uk)

██████████ [@uandiplc.com](mailto:██████████@uandiplc.com)

ENVIRONMENT AND SAFETY INFORMATION ACT 1988

SECTION 4 - PROTECTION OF TRADE SECRETS

The above Act requires the London Fire Commissioner to maintain public registers of notices issued under Article 30 of the Regulatory Reform (Fire Safety) Order 2005 (as amended), (other than those which impose requirements or prohibitions solely for the protection of persons at work) and Sections 21 and 22 of the Health and Safety at Work etc, Act 1974.

Provisions are made within the Act for persons on whom the above notices are served to appeal against any proposed entry in the register which may disclose "trade secrets" or "secret manufacturing processes".

Entries in the register are required to be made after the period for appeal against the notice expires or after any appeal is disposed of.

If you feel that any such entry would disclose information about a trade secret or secret manufacturing process you may write to the Commissioner within a period of 14 days following the service of the notice, requesting exclusion of these details (see Section 4 of the 1988 Act).

Notes relating to Schedule of Fire Safety Audit Observations attached to this notice.

Important information to consider before taking remedial steps:

1. Words written in BLOCK CAPITALS in the attached schedule are standard terms defined in "Definitions of standard terms used in means of escape requirements" which form part of this schedule.
2. Officers of the Commissioner may visit your premises during the course of the notice, to ensure the dates within this plan are being followed.
3. Notwithstanding any consultation undertaken by the Commissioner, **before** you make any alterations to the premises, **you** must apply for local authority building control department approval (and/or the approval of any other bodies having a statutory interest in the premises) if their permission is required for those alterations to be made.
4. There may be suitable alternative safety measures to those detailed in the attached schedule, which would meet the requirements of The Order. If you wish to propose or discuss any alternative measures you should get in touch with the person named as the contact above, before you take any action, to ensure that your proposed measures are deemed satisfactory by the Commissioner.
5. Remedial steps must be undertaken by a competent person who has sufficient training, experience, knowledge or other qualities to enable him or her to properly undertake them.
6. We recommend that remedial steps are undertaken in accordance with the appropriate British or European Standards, or recognised industry guidance.

SCHEDULE

PREMISES: Dewey Court, 7 St. Mark's Square, Bromley, BR2 9UZ

FILE NUMBER: 92/259152

This schedule should be read in conjunction with the Commissioner's Notice dated **12 October 2022**.

The condition(s) specified in the Regulatory Reform (Fire Safety) Order 2005 (as amended), were being contravened and the following step(s) need(s) to be taken in order to comply with the above legislation:

Article	Area of Concern	Steps Considered necessary to remedy the contravention.
Article 11	At the time of the audit your preventative and protective measures had not been planned, organised, controlled, monitored or reviewed where required. It was found that the erection of signs to indicate the location of sprinkler isolator valves and solar PV AC/DC isolators had not been organised.	Arrangements identified as not suitably addressed must be effectively planned, organised, controlled, monitored or reviewed.
Article 14	At the time of the audit the emergency routes or exits were inadequate. It was found that the lobby door on the 4 th floor leading to the staircase was missing the intumescent strip, reducing the FIRE RESISTANCE to the protected stair.	Ensure adequate emergency routes and exits, for use by relevant persons in the premises, are available and can be safely and effectively used at all relevant times. This can be achieved by installing the missing intumescent strip.
Article 17	The corridors, lobbies and stairs used for access to and from flats in the premises (the access route(s)) are intended for use by relevant persons as a PROTECTED ROUTE. This route should provide a safe means of escape in the event of fire and must be maintained in an efficient state, in efficient working order and good repair. During the audit it was found that the responsible person for management of the access route has not prevented or addressed deficiencies in the FIRE RESISTANCE of the PROTECTED ROUTE and/or required rectification of defects that have arisen in, and/or alterations made to, the protection to the access route. The PROTECTED ROUTE has been compromised by the fitting of doors that do not provide 30 minutes fire protection to the access route. Flats front door 19 was missing a self closing device. Flat front door 28 did not close fully into its frame under its own power.	Ensure the access corridor is returned to its intended state as a PROTECTED ROUTE to afford protection from fire in a flat to relevant persons who may require use of that corridor for safe escape from the premises in case of fire. Remedial work that may be necessary for this purpose must be assessed and completed by a competent person who is practised in application of the relevant standards for means of escape. Your attention is drawn to the provisions of subsections (2) (3) and (4) of Article 17 of the Regulatory Reform (Fire Safety) Order 2005 in the attached extracts of legislation. You are advised that walls in PROTECTED ROUTES should have a minimum of 60 minutes FIRE RESISTANCE. Openings in the walls leading to accommodation off a PROTECTED ROUTE (including doors in entrance ways, service openings, borrowed light glazing, holes around cables, trunking and pipework) should be of a minimum 30 minutes FIRE RESISTANCE. Available means the responsible person could use to comply with Article 17 (1) may include enforcing terms of lease and Landlord and Tenant/Property legislation as lessor/owner.

Article 17	At the time of the audit, you had not ensured that a suitable system of maintenance was in place in your premises. It was found that the lobby door on the 4 th floor leading to the staircase had not been maintained and was missing intumescent strips.	Arrange initial and ongoing maintenance to ensure fire safety measures are kept in an efficient state, working order and good repair. This can be achieved by ensuring that all fire doors are subject to a maintenance programme.
Article 9	At the time of the audit the fire risk assessment for your premises was not suitable and sufficient. It was found that: 1) The fire risk assessment is not specific to this premises and covers multiple blocks with different risks. 2) The fire risk assessment incorrectly identifies that a simultaneous evacuation strategy is in place and does not identify the correct emergency strategy based on the findings of the fire risk assessment. The premises has a stay put emergency strategy in place. 3) The fire risk assessment does not consider the potential risks to relevant persons posed by the external façade and timber located around balconies. 4) The fire risk assessment did not identify that flat front doors (such as sampled flat 19) were not fitted with a self closing device. Flat front door 28 did not close fully into the frame under its own power and therefore did not offer the required 30 minutes protection to the escape route.	The fire risk assessment should be reviewed, with specific consideration given to ensuring that: 1) The fire risk assessment is specific to this premises. 2) The fire risk assessment identifies the correct emergency strategy for the premises based on the findings. 3) Consideration is given to the potential risks to relevant persons posed by the external façade and balconies. 4) Front doors to flats are fitted with self closing devices which close the doors fully into their frames.

*****RECOMMENDATIONS NOT FORMING REQUIREMENTS OF THE SCHEDULE*****

The Commissioner would strongly urge that you consider the presence of combustible façade cladding materials as part of the risk assessment process for these premises. All relevant information about any replacement window and facade schemes should be made fully available to fire risk assessors. Where no reliable information is available for a given property, a strategy to assess the risk and where necessary implement short, medium and long term actions to address the risk should be implemented.

Where remedial measures are to be undertaken to which consultation requirements under Section 20 of the Landlord and Tenant Act 1985 will apply, the Commissioner would urge you to consider application of the disapplication provisions under Section 20ZA of that Act.

The Company Secretary
Cathedral (Bromley) Limited
7a Howick Place
London
SW1P 1DZ

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

Date 12 October 2022
Our Ref 92/259153/

ENFORCEMENT NOTICE

**Notice requiring steps to be taken under Article 30 of the
Regulatory Reform (Fire Safety) Order 2005 (as amended)**

TO:

Name: **Cathedral (Bromley) Limited**

Address: **7a Howick Place, London, SW1P 1DZ**

Concerning Premises at: **Varney Court, 10 St. Mark's Square, Bromley, BR2 9YD**

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 (as amended), hereafter referenced as ('The Order') in London.

I [REDACTED] Assistant Commissioner (Fire Safety) on behalf of the Commissioner hereby give you notice that the Commissioner is of the opinion that you, as a person being under an obligation to do so, have failed to comply with the duties placed upon you by the Regulatory Reform (Fire Safety) Order 2005 (as amended) (The Order) in respect of the above named premises, the relevant persons who may be on the premises or who may be affected by a fire on the premises.

The matters which, in the opinion of the Commissioner, constitute the failure(s) to comply with The Order are specified in the Schedule of Fire Safety Observations attached to this notice. The Commissioner is further of the opinion that the steps identified in the schedule to this notice must be taken to remedy the specified failure(s) and comply with The Order.

The relevant extracts of the legislation are attached.

There may be suitable alternative safety measures, to those detailed in this notice that would meet the requirements of The Order. If you wish to propose or discuss any alternative measures you should contact the person named below, before you take any action, to ensure that your proposed measures will be deemed satisfactory by the Commissioner.

The steps must be taken by **29 March 2023** (or such extension if granted by the Commissioner).

Unless the steps identified in the schedule attached to this notice have been complied with, or such other steps are taken to remedy the failures in consultation with the Commissioner, you will be deemed not to have complied with this notice.

If you fail to comply with the requirements of this notice, you may have committed an offence. The Commissioner may consider a prosecution against you. If you are found guilty, you will be liable to a fine or imprisonment (or both).

You have the right to appeal against this notice, by way of complaint for an order, to the Clerk to the Court of the Magistrates' Court acting for the petty sessions area in which your premises is located. If you wish to bring an appeal, you must do so within 21 days of the date this notice is served on you. The Magistrates' Court Act 1980 will apply to the proceedings. The bringing of an appeal will suspend the operation of this enforcement notice. An appeal against an enforcement notice served under Article 30 of the Regulatory Reform (Fire Safety) Order 2005 (as amended), may be brought on any grounds. These may include that you are aggrieved:

- a) by anything mentioned in the notice with respect to the premises concerned, or the relevant persons as defined by The Order, being a step which must be taken in order to comply with The Order; or
- b) by the period allowed by such a notice for the taking of any steps mentioned in it.

If at any time you wish to discuss the requirements of this notice, or are experiencing difficulty in carrying out the work, please contact **Inspecting Officer** [REDACTED]

Signed:

[REDACTED]

Assistant Commissioner
(The Officer appointed for the purpose)

Dated: 12 October 2022

The contents of this notice are without prejudice to any requirements or recommendations that may be made by the Commissioner under the Petroleum (Consolidation) Regulations 2014, or either the local authority or the Health and Safety Executive under any other Act of Parliament or Regulation for which they are the enforcing authority. Approval will normally be required under the Building Regulations for any building works for which you are obliged to notify the local Building Control Officer under the Building Regulations 2010 or an Approved Inspector under the Building (Approved Inspectors etc) Regulations, 2010.

Reply to Inspecting Officer [REDACTED]
Direct T 020 8555 1200 ext. [REDACTED]
FSR-AdminSupport@london-fire.gov.uk

Encl: FS03_01a, FS03_01b, FS03_06

Cc: The Company Secretary, Living City Asset Management Limited, 10 Durling Street, Manchester,
M12 6FS

[REDACTED]

[REDACTED]

ENVIRONMENT AND SAFETY INFORMATION ACT 1988

SECTION 4 - PROTECTION OF TRADE SECRETS

The above Act requires the London Fire Commissioner to maintain public registers of notices issued under Article 30 of the Regulatory Reform (Fire Safety) Order 2005 (as amended), (other than those which impose requirements or prohibitions solely for the protection of persons at work) and Sections 21 and 22 of the Health and Safety at Work etc., Act 1974.

Provisions are made within the Act for persons on whom the above notices are served to appeal against any proposed entry in the register which may disclose "trade secrets" or "secret manufacturing processes".

Entries in the register are required to be made after the period for appeal against the notice expires or after any appeal is disposed of.

If you feel that any such entry would disclose information about a trade secret or secret manufacturing process you may write to the Commissioner within a period of 14 days following the service of the notice, requesting exclusion of these details (see Section 4 of the 1988 Act).

Notes relating to Schedule of Fire Safety Audit Observations attached to this notice.

Important information to consider before taking remedial steps:

1. Words written in BLOCK CAPITALS in the attached schedule are standard terms defined in "Definitions of standard terms used in means of escape requirements" which form part of this schedule.
2. Officers of the Commissioner may visit your premises during the course of the notice, to ensure the dates within this plan are being followed.
3. Notwithstanding any consultation undertaken by the Commissioner, **before** you make any alterations to the premises, **you** must apply for local authority building control department approval (and/or the approval of any other bodies having a statutory interest in the premises) if their permission is required for those alterations to be made.
4. There may be suitable alternative safety measures to those detailed in the attached schedule, which would meet the requirements of The Order. If you wish to propose or discuss any alternative measures you should get in touch with the person named as the contact above, before you take any action, to ensure that your proposed measures are deemed satisfactory by the Commissioner.
5. Remedial steps must be undertaken by a competent person who has sufficient training, experience, knowledge or other qualities to enable him or her to properly undertake them.
6. We recommend that remedial steps are undertaken in accordance with the appropriate British or European Standards, or recognised industry guidance.

SCHEDULE

PREMISES: Varney Court, 10 St. Mark's Square, Bromley, BR2 9YD

FILE NUMBER: 92/259153

This schedule should be read in conjunction with the Commissioner's Notice dated **12 October 2022**.

The condition(s) specified in the Regulatory Reform (Fire Safety) Order 2005 (as amended), were being contravened and the following step(s) need(s) to be taken in order to comply with the above legislation:

Article	Area of Concern	Steps Considered necessary to remedy the contravention.
Article 11	At the time of the audit your preventative and protective measures had not been planned, organised, controlled, monitored or reviewed where required. It was found that the erection of signs to indicate the location of sprinkler isolator valves and solar PV AC/DC isolators had not been organised.	Arrangements identified as not suitably addressed must be effectively planned, organised, controlled, monitored or reviewed.
Article 17	The corridors, lobbies and stairs used for access to and from flats in the premises (the access route(s)) are intended for use by relevant persons as a PROTECTED ROUTE. This route should provide a safe means of escape in the event of fire and must be maintained in an efficient state, in efficient working order and good repair. During the audit it was found that the responsible person for management of the access route has not prevented or addressed deficiencies in the FIRE RESISTANCE of the PROTECTED ROUTE and/or required rectification of defects that have arisen in, and/or alterations made to, the protection to the access route. The PROTECTED ROUTE has been compromised by the fitting of doors that do not provide 30 minutes fire protection to the access route. Flat front doors 55 and 21 were missing self closing devices and flat 40 front door did not close fully into its frame under its own power.	Ensure the access corridor is returned to its intended state as a PROTECTED ROUTE to afford protection from fire in a flat to relevant persons who may require use of that corridor for safe escape from the premises in case of fire. Remedial work that may be necessary for this purpose must be assessed and completed by a competent person who is practised in application of the relevant standards for means of escape. Your attention is drawn to the provisions of subsections (2) (3) and (4) of Article 17 of the Regulatory Reform (Fire Safety) Order 2005 in the attached extracts of legislation. You are advised that walls in PROTECTED ROUTES should have a minimum of 60 minutes FIRE RESISTANCE. Openings in the walls leading to accommodation off a PROTECTED ROUTE (including doors in entrance ways, service openings, borrowed light glazing, holes around cables, trunking and pipework) should be of a minimum 30 minutes FIRE RESISTANCE. Available means the responsible person could use to comply with Article 17 (1) may include enforcing terms of lease and Landlord and Tenant/Property legislation as lessor/owner.

Article 8	At the time of the audit the FIRE RESISTING separation in your premises was inadequate. It was found that there were holes around pipes passing horizontally through a compartment wall from the energy centre into the car park.	Provide suitable FIRE RESISTING separation by ensuring that holes around pipes passing horizontally through the compartment wall from the energy centre into the car park are filled with suitable fire stopping material.
Article 8	At the time of the audit the general fire precautions required to prevent fire and smoke spread via shafts, risers or ducting were inadequate. It was found that plastic pipes running vertically from the energy centre were not fitted with intumescent collars.	Take the general fire precautions required to prevent fire and smoke spread by ensuring that plastic pipes running vertically from the energy centre are fitted with intumescent collars.
Article 9	At the time of the audit the fire risk assessment for your premises was not suitable and sufficient. It was found that: 1) The fire risk assessment is not specific to this premises and covers multiple blocks with different risks. 2) The fire risk assessment incorrectly identifies that a simultaneous evacuation strategy is in place and does not identify the correct emergency strategy based on the findings of the fire risk assessment. The premises has a stay put emergency strategy in place. 3) The fire risk assessment does not consider the potential risks to relevant persons posed by the external façade and timber located around balconies. 4) The fire risk assessment did not identify that plastic pipes running vertically from the energy centre were not fitted with intumescent collars. 5) The fire risk assessment did not identify that the sampled flat front doors 55 and 21 were not fitted with a self closing device and did not therefore offer the required 30 minute protection to the escape route.	The fire risk assessment should be reviewed, with specific consideration given to ensuring that: 1) The fire risk assessment is specific to this premises. 2) The fire risk assessment identifies the correct emergency strategy for the premises based on the findings. 3) Consideration is given to the potential risks to relevant persons posed by the external façade and balconies. 4) Plastic pipes running vertically from the energy centre are fitted with intumescent collars. 5) Flat front doors are fitted with self closing devices, which close the doors fully into their frames.

*****RECOMMENDATIONS NOT FORMING REQUIREMENTS OF THE SCHEDULE*****

The Commissioner would strongly urge that you consider the presence of combustible façade cladding materials as part of the risk assessment process for these premises. All relevant information about any replacement window and facade schemes should be made fully available to fire risk assessors. Where no reliable information is available for a given property, a strategy to assess the risk and where necessary implement short, medium and long term actions to address the risk should be implemented.

Where remedial measures are to be undertaken to which consultation requirements under Section 20 of the Landlord and Tenant Act 1985 will apply, the Commissioner would urge you to consider application of the disapplication provisions under Section 20ZA of that Act.

The Company Secretary
Cathedral (Bromley) Limited
7a Howick Place
London
SW1P 1DZ

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

Date 12 September 2022
Our Ref 92/259154/

ENFORCEMENT NOTICE

**Notice requiring steps to be taken under Article 30 of the
Regulatory Reform (Fire Safety) Order 2005 (as amended)**

TO :

Name: **Cathedral (Bromley) Limited**

Address: **7a Howick Place, London, SW1P 1DZ**

Concerning Premises at: **Brouard Court, 13 St Mark's Square, Bromley, BR2 9YF**

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 (as amended), hereafter referenced as ('The Order') in London.

I [REDACTED] Assistant Commissioner (Fire Safety) on behalf of the Commissioner hereby give you notice that the Commissioner is of the opinion that you, as a person being under an obligation to do so, have failed to comply with the duties placed upon you by the Regulatory Reform (Fire Safety) Order 2005 (as amended) (The Order) in respect of the above named premises, the relevant persons who may be on the premises or who may be affected by a fire on the premises.

The matters which, in the opinion of the Commissioner, constitute the failure(s) to comply with The Order are specified in the Schedule of Fire Safety Observations attached to this notice. The Commissioner is further of the opinion that the steps identified in the schedule to this notice must be taken to remedy the specified failure(s) and comply with The Order.

The relevant extracts of the legislation are attached.

There may be suitable alternative safety measures, to those detailed in this notice that would meet the requirements of The Order. If you wish to propose or discuss any alternative measures you should contact the person named below, before you take any action, to ensure that your proposed measures will be deemed satisfactory by the Commissioner.

The steps must be taken by **27 February 2023** (or such extension if granted by the Commissioner).

Unless the steps identified in the schedule attached to this notice have been complied with, or such other steps are taken to remedy the failures in consultation with the Commissioner, you will be deemed not to have complied with this notice.

If you fail to comply with the requirements of this notice, you may have committed an offence. The Commissioner may consider a prosecution against you. If you are found guilty, you will be liable to a fine or imprisonment (or both).

You have the right to appeal against this notice, by way of complaint for an order, to the Clerk to the Court of the Magistrates' Court acting for the petty sessions area in which your premises is located. If you wish to bring an appeal, you must do so within 21 days of the date this notice is served on you. The Magistrates' Court Act 1980 will apply to the proceedings. The bringing of an appeal will suspend the operation of this enforcement notice. An appeal against an enforcement notice served under Article 30 of the Regulatory Reform (Fire Safety) Order 2005 (as amended), may be brought on any grounds. These may include that you are aggrieved:

- a) by anything mentioned in the notice with respect to the premises concerned, or the relevant persons as defined by The Order, being a step which must be taken in order to comply with The Order; or
- b) by the period allowed by such a notice for the taking of any steps mentioned in it.

If at any time you wish to discuss the requirements of this notice, or are experiencing difficulty in carrying out the work, please contact **Inspecting Officer** [REDACTED]

Sign

[REDACTED]

Dated: 12 September 2022

(The Officer appointed for the purpose)

The contents of this notice are without prejudice to any requirements or recommendations that may be made by the Commissioner under the Petroleum (Consolidation) Regulations 2014, or either the local authority or the Health and Safety Executive under any other Act of Parliament or Regulation for which they are the enforcing authority. Approval will normally be required under the Building Regulations for any building works for which you are obliged to notify the local Building Control Officer under the Building Regulations 2010 or an Approved Inspector under the Building (Approved Inspectors etc) Regulations, 2010.

Reply to Inspecting Officer [REDACTED]
Direct T 020 8555 1200 [REDACTED]
FSR-AdminSupport@london-fire.gov.uk

Encl: FS03_01a
FS03_01b
FS03_06

Cc: The Company Secretary, Living Asset Management, 10 Durling Street, Ardwick Green,
Manchester, M12 6FS

[REDACTED]

[REDACTED]

ENVIRONMENT AND SAFETY INFORMATION ACT 1988

SECTION 4 - PROTECTION OF TRADE SECRETS

The above Act requires the London Fire Commissioner to maintain public registers of notices issued under Article 30 of the Regulatory Reform (Fire Safety) Order 2005 (as amended), (other than those which impose requirements or prohibitions solely for the protection of persons at work) and Sections 21 and 22 of the Health and Safety at Work etc., Act 1974.

Provisions are made within the Act for persons on whom the above notices are served to appeal against any proposed entry in the register which may disclose "trade secrets" or "secret manufacturing processes".

Entries in the register are required to be made after the period for appeal against the notice expires or after any appeal is disposed of.

If you feel that any such entry would disclose information about a trade secret or secret manufacturing process you may write to the Commissioner within a period of 14 days following the service of the notice, requesting exclusion of these details (see Section 4 of the 1988 Act).

Notes relating to Schedule of Fire Safety Audit Observations attached to this notice.

Important information to consider before taking remedial steps:

1. Words written in BLOCK CAPITALS in the attached schedule are standard terms defined in "Definitions of standard terms used in means of escape requirements" which form part of this schedule.
2. Officers of the Commissioner may visit your premises during the course of the notice, to ensure the dates within this plan are being followed.
3. Notwithstanding any consultation undertaken by the Commissioner, **before** you make any alterations to the premises, **you** must apply for local authority building control department approval (and/or the approval of any other bodies having a statutory interest in the premises) if their permission is required for those alterations to be made.
4. There may be suitable alternative safety measures to those detailed in the attached schedule, which would meet the requirements of The Order. If you wish to propose or discuss any alternative measures you should get in touch with the person named as the contact above, before you take any action, to ensure that your proposed measures are deemed satisfactory by the Commissioner.
5. Remedial steps must be undertaken by a competent person who has sufficient training, experience, knowledge or other qualities to enable him or her to properly undertake them.
6. We recommend that remedial steps are undertaken in accordance with the appropriate British or European Standards, or recognised industry guidance.

SCHEDULE

PREMISES: Brouard Court, 13 St Mark's Square, Bromley, BR2 9YF

FILE NUMBER: 92/259154

This schedule should be read in conjunction with the Commissioner's Notice dated **12 September 2022**.

The condition(s) specified in the Regulatory Reform (Fire Safety) Order 2005 (as amended), were being contravened and the following step(s) need(s) to be taken in order to comply with the above legislation:

Article	Area of Concern	Steps Considered necessary to remedy the contravention.
Article 11	At the time of the audit your preventative and protective measures had not been planned, organised, controlled, monitored or reviewed where required. It was found that: 1) The storage of combustible items within utility risers had not been effectively controlled or monitored as combustible items (contractors waste) were being stored within the common riser leading up from the ground floor communications room. 2) The erection of signs to indicate the location of sprinkler isolator valves and solar photovoltaic (PV) AC/DC isolators had not been organised.	Arrangements identified as not suitably addressed must be effectively planned, organised, controlled, monitored and reviewed.
Article 14	At the time of the audit the emergency routes or exits were inadequate. It was found that: 1) The ground floor electric riser cupboard was formed of single skin plasterboard and the door to this cupboard was not fitted with cold smoke seals meaning it did not give the required 30 minutes protection to the escape route. 2) The 17th floor water riser cupboard (ignition source present) had phenolic foam pipe insulation around pipes running through the compartment wall into the false ceiling above the escape route.	Ensure adequate emergency routes and exits, for use by relevant persons in the premises, are available and can be safely and effectively used at all relevant times. This can be achieved by ensuring that: 1) All riser cupboards are of 30 minute FIRE RESISTING construction and doors to these cupboards give the required 30 minutes protection to escape routes. 2) Insulation around pipework passing through compartment walls is adequately FIRE RESISTANT.

Article 17	The corridors, lobbies and stairs used for access to and from flats in the premises (the access route(s)) are intended for use by relevant persons as a PROTECTED ROUTE. This route should provide a safe means of escape in event of fire and must be maintained in an efficient state, in efficient working order and good repair. During the audit it was found that the responsible person for management of the access route has not prevented or addressed deficiencies in the FIRE RESISTANCE of the PROTECTED ROUTE and/or required rectification of defects that have arisen in, and/or alterations made to, the protection to the access route. The PROTECTED ROUTE has been compromised by the fitting of doors that do not provide 30 minutes fire protection to the access route. The front door to sampled flat 86 was not fitted with a self closing device.	Ensure the access corridor is returned to its intended state as a PROTECTED ROUTE to afford protection from fire in a flat to relevant persons who may require use of that corridor for safe escape from the premises in case of fire. Remedial work that may be necessary for this purpose, must be assessed and completed by a competent person who is practised in the application of the relevant standards for means of escape. Your attention is drawn to the provisions of subsections (2) (3) and (4) of Article 17 of the Regulatory Reform (Fire Safety) Order 2005 in the attached extracts of legislation. You are advised that walls in PROTECTED ROUTES should have a minimum of 60 minutes FIRE RESISTANCE. Openings in the walls leading to accommodation off a PROTECTED ROUTE (including doors in entrance ways, service openings, borrowed light glazing, holes around cables trunking and pipework) should be of a minimum 30 minutes FIRE RESISTANCE. Available means the responsible person could use to comply with Article 17 (1) may include enforcing terms of lease and Landlord and Tenant/Property legislation as lessor/owner.
Article 8	At the time of the audit the general fire precautions required to prevent fire and smoke spread via shafts, risers or ducting were inadequate. It was found that plastic pipes running vertically from the energy centre were not fitted with intumescent collars.	Take the general fire precautions required to prevent fire and smoke spread by ensuring that plastic pipes running vertically from the energy centre are fitted with intumescent collars.
Article 8	At the time of the audit the FIRE RESISTING separation in your premises was inadequate. It was found that there were holes around pipes passing horizontally through a compartment wall from the energy centre into the car park.	Provide suitable FIRE RESISTING separation by ensuring that holes around pipes passing horizontally through the compartment wall from the energy centre into the car park are filled with suitable fire stopping material.
Article 9	At the time of the audit the fire risk assessment for your premises was not suitable and sufficient. It was found that: 1) The fire risk assessment is not specific to this premises and covers multiple blocks with different risks. 2) The fire risk assessment incorrectly identifies that a simultaneous evacuation strategy is in place and does not identify the	The fire risk assessment should be reviewed, with specific consideration given to ensuring that: 1) The fire risk assessment is specific to this premises. 2) The fire risk assessment identifies the correct emergency strategy for the premises based on the findings of the fire risk assessment.

Article 9 (Cont'd)	correct emergency strategy based on the findings of the fire risk assessment. The premises has a stay put emergency strategy in place. 3) The fire risk assessment does not consider the potential risks to relevant persons posed by the external façade and timber located around balconies. 4) The fire risk assessment did not identify that plastic pipes running vertically from the energy centre were not fitted with intumescent collars. 5) The fire risk assessment did not identify that the ground floor electric riser cupboard was formed of single skin plasterboard and did not give the required 30 minutes protection to the escape route. 6) The fire risk assessment did not consider that combustible items (contractors waste) were being stored within the common riser leading up from the ground floor communications room. 7) The fire risk assessment did not identify that the front door to sampled flat 86 was not fitted with a self closing device and did not therefore offer the required 30 minutes protection to the escape route. 8) The fire risk assessment did not identify that the penthouse flat was a duplex apartment over floors 18 and 19 and no consideration had been given to the means of escape for relevant persons from this flat.	3) Consideration is given to the potential risks to relevant persons posed by the external façade and balconies. 4) Plastic pipes running vertically from the energy centre are fitted with intumescent collars. 5) The ground floor electric riser cupboard gives the required 30 minutes protection to the escape route. 6) Combustible items are not stored within the common risers. 7) Front doors to flats are fitted with self closing devices which close the doors fully into their frames. 8) The means of escape from the duplex penthouse flat is adequately considered.
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*****RECOMMENDATIONS NOT FORMING REQUIREMENTS OF THE SCHEDULE*****

The Commissioner would strongly urge that you consider the presence of combustible façade cladding materials as part of the risk assessment process for these premises. All relevant information about any replacement window and facade schemes should be made fully available to fire risk assessors. Where no reliable information is available for a given property, a strategy to assess the risk and where necessary implement short, medium and long term actions to address the risk should be implemented.

Where remedial measures are to be undertaken to which consultation requirements under Section 20 of the Landlord and Tenant Act 1985 will apply, the Commissioner would urge you to consider application of the disapplication provisions under Section 20ZA of that Act.

The Company Secretary
Cathedral (Bromley 2) Limited
100 Victoria Street
London
SW1E 1JL

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

Date 2 October 2024
Our Ref 92/259152/

ENFORCEMENT NOTICE

**Notice requiring steps to be taken under Article 30 of the
Regulatory Reform (Fire Safety) Order 2005 (as amended)**

TO :

Name: **Cathedral (Bromley 2) Limited**

Address: **100 Victoria Street, London SW1E 1JL**

Concerning Premises at: **Dewey Court, 7 St Mark's Square, Bromley BR2 9UZ**

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 (as amended), hereafter referenced as ('The Order') in London.

I, Assistant Commissioner (Fire Safety) on behalf of the Commissioner hereby give you notice that the Commissioner is of the opinion that you, as a person being under an obligation to do so, have failed to comply with the duties placed upon you by the Regulatory Reform (Fire Safety) Order 2005 (as amended) (The Order) in respect of the above named premises, the relevant persons who may be on the premises or who may be affected by a fire on the premises.

The matters which, in the opinion of the Commissioner, constitute the failure(s) to comply with The Order are specified in the Schedule of Fire Safety Observations attached to this notice. The Commissioner is further of the opinion that the steps identified in the schedule to this notice must be taken to remedy the specified failure(s) and comply with The Order.

The relevant extracts of the legislation are attached.

There may be suitable alternative safety measures, to those detailed in this notice that would meet the requirements of The Order. If you wish to propose or discuss any alternative measures you should contact the person named below, before you take any action, to ensure that your proposed measures will be deemed satisfactory by the Commissioner.

The steps must be taken by **1 April 2026** (or such extension if granted by the Commissioner).

Unless the steps identified in the schedule attached to this notice have been complied with, or such other steps are taken to remedy the failures in consultation with the Commissioner, you will be deemed not to have complied with this notice.

If you fail to comply with the requirements of this notice, you may have committed an offence. The Commissioner may consider a prosecution against you. If you are found guilty, you will be liable to a fine or imprisonment (or both).

You have the right to appeal against this notice, by way of complaint for an order, to the Clerk to the Court of the Magistrates' Court acting for the petty sessions area in which your premises is located. If you wish to bring an appeal, you must do so within 21 days of the date this notice is served on you. The Magistrates' Court Act 1980 will apply to the proceedings. The bringing of an appeal will suspend the operation of this enforcement notice. An appeal against an enforcement notice served under Article 30 of the Regulatory Reform (Fire Safety) Order 2005 (as amended), may be brought on any grounds. These may include that you are aggrieved:

- a) by anything mentioned in the notice with respect to the premises concerned, or the relevant persons as defined by The Order, being a step which must be taken in order to comply with The Order; or
- b) by the period allowed by such a notice for the taking of any steps mentioned in it.

If at any time you wish to discuss the requirements of this notice, or are experiencing difficulty in carrying out the work, please contact **Inspecting Officer** [REDACTED]

Signed:

[REDACTED]

Dated: 2 October 2024

Assistant Commissioner
(The Officer appointed for the purpose)

The contents of this notice are without prejudice to any requirements or recommendations that may be made by the Commissioner under the Petroleum (Consolidation) Regulations 2014, or either the local authority or the Health and Safety Executive under any other Act of Parliament or Regulation for which they are the enforcing authority. Approval will normally be required under the Building Regulations for any building works for which you are obliged to notify the local Building Control Officer under the Building Regulations 2010 or an Approved Inspector under the Building (Approved Inspectors etc) Regulations, 2010.

Reply to Inspecting Officer [REDACTED]
Direct T 0208 555 1200 ext [REDACTED]
FSR-AdminSupport@london-fire.gov.uk

Encl: FS03_01a, FS03_01b, FS03_06

Cc: [REDACTED]vingcity.co.uk
[REDACTED]livingcity.co.uk
[REDACTED]@bromley.gov.uk
[REDACTED]@hse.gov.uk

ENVIRONMENT AND SAFETY INFORMATION ACT 1988

SECTION 4 - PROTECTION OF TRADE SECRETS

The above Act requires the London Fire Commissioner to maintain public registers of notices issued under Article 30 of the Regulatory Reform (Fire Safety) Order 2005 (as amended), (other than those which impose requirements or prohibitions solely for the protection of persons at work) and Sections 21 and 22 of the Health and Safety at Work etc, Act 1974.

Provisions are made within the Act for persons on whom the above notices are served to appeal against any proposed entry in the register which may disclose "trade secrets" or "secret manufacturing processes".

Entries in the register are required to be made after the period for appeal against the notice expires or after any appeal is disposed of.

If you feel that any such entry would disclose information about a trade secret or secret manufacturing process you may write to the Commissioner within a period of 14 days following the service of the notice, requesting exclusion of these details (see Section 4 of the 1988 Act).

Notes relating to Schedule of Fire Safety Audit Observations attached to this notice.

Important information to consider before taking remedial steps:

1. Words written in BLOCK CAPITALS in the attached schedule are standard terms defined in "Definitions of standard terms used in means of escape requirements" which form part of this schedule.
2. Officers of the Commissioner may visit your premises during the course of the notice, to ensure the dates within this plan are being followed.
3. Notwithstanding any consultation undertaken by the Commissioner, **before** you make any alterations to the premises, **you** must apply for local authority building control department approval (and/or the approval of any other bodies having a statutory interest in the premises) if their permission is required for those alterations to be made.
4. There may be suitable alternative safety measures to those detailed in the attached schedule, which would meet the requirements of The Order. If you wish to propose or discuss any alternative measures you should get in touch with the person named as the contact above, before you take any action, to ensure that your proposed measures are deemed satisfactory by the Commissioner.
5. Remedial steps must be undertaken by a competent person who has sufficient training, experience, knowledge or other qualities to enable him or her to properly undertake them.
6. We recommend that remedial steps are undertaken in accordance with the appropriate British or European Standards, or recognised industry guidance.

SCHEDULE

PREMISES: Dewey Court, 7 St Mark's Square, Bromley BR2 9UZ

FILE NUMBER: 92/259152

This schedule should be read in conjunction with the Commissioner's Notice dated **2 October 2024**.

The condition(s) specified in the Regulatory Reform (Fire Safety) Order 2005 (as amended), were being contravened and the following step(s) need(s) to be taken in order to comply with the above legislation:

Article	Area of Concern	Steps Considered necessary to remedy the contravention.
Article 11	At the time of the audit your preventative and protective measures had not been planned, organised, controlled, monitored or reviewed where required. It was found that: 1) You had not planned and organised dates to implement significant findings of the fire risk assessment. During the inspection, it was noted that no adequate decisions had been made how to address the issues with the timber lined balconies since the external wall review in 2020, nor any steps had been taken since the fire in 2022 to prevent a similar fire incident from recurring. 2) The sharing of building information electronically via the LFB High Rise Portal had not been planned or organised as per the requirements of The Fire Safety (England) Regulations 2022. 3) You had not planned and organised the displaying of wayfinding signage. Signage should conform to the specifications and location set out in paragraph 15.14 to 15.16 of Approved Document B Volume 1 2019 edition incorporating 2020 amendments.	Arrangements identified as not suitably addressed must be effectively planned, organised, controlled, monitored or reviewed.

Article 11 continued	4) You had not planned and organised the provision of documents for the use by the Fire and Rescue Service that is required under the Fire Safety (England) Regulations 2022. These documents are to be provided within the secure information box.	
Article 22	At the time of the audit you had not cooperated and coordinated with other responsible persons. It was found that: 1) You do not have arrangements in place for coordinating and cooperating with other responsible persons /duty holders to ensure that site specific fire risk assessments are being carried out. 2) You do not have arrangements in place for coordinating and cooperating with other responsible persons /duty holders to ensure the required provision of information to the fire and rescue service as per the Fire Safety (England) Regulations 2022 are being implemented.	You must take all reasonable steps to cooperate and coordinate with other responsible persons/duty holders. With specific consideration given to the provision of site specific fire risk assessments and supplying the fire and rescue service with the required information via electronic format as per the Fire Safety (England) Regulations 2022.
Article 8	At the time of the audit the general fire precautions as identified in the significant findings of your fire risk assessment had not been implemented. It was found that the fire risk assessment identified that all balconies present a risk of fire spread, and no evidence was provided to demonstrate that action had been taken within the recommended timescales	Implement the significant findings of your fire risk assessment, in particular the significant findings of the fire risk assessment in relation to balconies throughout the premises. Given the history of fire, a permanent and robust solution must be found to address the issues with balconies. It is strongly recommended that the timber used in the construction and lining on all balconies are removed and replaced with materials of limited combustibility
Article 8	At the time of the audit the general fire precautions required to prevent fire and smoke spread via shafts, risers or ducting were inadequate. It was found that there are compartmentation breaches within the building, which promoted the fire to spread.	Take the general fire precautions required to prevent fire and smoke spread by reviewing standards of compartmentation throughout the premises to ensure that any breaches, including breaches in the balconies and breaches that extend into the building, are remedied to the required standards to prevent vertical fire spread.

Article 8 continued	Due to the intrusive nature of the recent fire, it was evident that no fire collars had been provided to seal the rainwater pipework, which penetrated from one balcony to another and extended into the building. It was also evident that the rainwater pipework was made of combustible material (plastic). This caused fire to spread vertically.	
Article 9	At the time of the audit the fire risk assessment for your premises was not suitable and sufficient. It was found that: 1) It had not considered the level of combustibility of materials used in the construction and lining of all balconies. It has also failed to consider the combustibility of the rainwater pipework, which penetrates from one balcony to another and extends into the building. It does not assess the consequences of the missing fire collars around the rainwater pipework. It has been evident from the fires that the materials used on the balconies and the rainwater pipework failed and promoted the fire spread not only externally, but also internally into the flats. 2) It failed to take into account that the fire retardant treatment has not been successful. This is evident from the balcony fires that spread from one balcony to another. 3) It had not determined the consequences of extending the automatic water fire suppression system onto the balconies. For instance, freezing of pipes in extremely cold weather conditions had not been considered.	The fire risk assessment should be reviewed, with specific consideration given to : 1) The fire risk appraisal of the external wall system, including the level of combustibility of materials used in the construction of the balconies throughout the premises, and the suitability and quality of installation of the rainwater pipes penetrating these balconies. 2) The suitability of the fire retardant treatment of the balconies throughout the premises and assessment of whether treating them is achievable. 3) The consequences and practicality of extending the automatic water fire suppression system in case of extremely cold weather conditions.

Article 9 continued	4) It had not been specific to this premises and covers multiple blocks with different risks. 5) the risks to relevant persons posed by the external wall façade which includes the timber balconies, as only the roof was taken into account as part of the 2020 façade report, carried out by Jason Hill of F.I.R.E Consultancy.	4) The fire risk assessment is specific to the premises. 5) Considerations given to the risks to relevant persons posed by the external wall façade which includes the timber balconies.
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*****RECOMMENDATIONS NOT FORMING REQUIREMENTS OF THE SCHEDULE*****

The Commissioner would strongly urge that you consider the presence of combustible façade cladding materials as part of the risk assessment process for these premises. All relevant information about any replacement window and facade schemes should be made fully available to fire risk assessors. Where no reliable information is available for a given property, a strategy to assess the risk and where necessary implement short, medium and long term actions to address the risk should be implemented.

Where remedial measures are to be undertaken to which consultation requirements under Section 20 of the Landlord and Tenant Act 1985 will apply, the Commissioner would urge you to consider application of the disapplication provisions under Section 20ZA of that Act.

The Company Secretary
Cathedral (Bromley 2) Limited
100 Victoria Street
London
SW1E 1JL

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

Date 2 October 2024
Our Ref 92/259154/

ENFORCEMENT NOTICE

**Notice requiring steps to be taken under Article 30 of the
Regulatory Reform (Fire Safety) Order 2005 (as amended)**

TO :

Name: **Cathedral (Bromley 2) Limited**

Address: **100 Victoria Street, London SW1E 1JL**

Concerning Premises at: **Brouard Court, 13 St Mark's Square, Bromley BR2 9YF**

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 (as amended), hereafter referenced as ('The Order') in London.

I Assistant Commissioner (Fire Safety) on behalf of the Commissioner hereby give you notice that the Commissioner is of the opinion that you, as a person being under an obligation to do so, have failed to comply with the duties placed upon you by the Regulatory Reform (Fire Safety) Order 2005 (as amended) (The Order) in respect of the above named premises, the relevant persons who may be on the premises or who may be affected by a fire on the premises.

The matters which, in the opinion of the Commissioner, constitute the failure(s) to comply with The Order are specified in the Schedule of Fire Safety Observations attached to this notice. The Commissioner is further of the opinion that the steps identified in the schedule to this notice must be taken to remedy the specified failure(s) and comply with The Order.

The relevant extracts of the legislation are attached.

There may be suitable alternative safety measures, to those detailed in this notice that would meet the requirements of The Order. If you wish to propose or discuss any alternative measures you should contact the person named below, before you take any action, to ensure that your proposed measures will be deemed satisfactory by the Commissioner.

The steps must be taken by **1 April 2026** (or such extension if granted by the Commissioner).

Unless the steps identified in the schedule attached to this notice have been complied with, or such other steps are taken to remedy the failures in consultation with the Commissioner, you will be deemed not to have complied with this notice.

If you fail to comply with the requirements of this notice, you may have committed an offence. The Commissioner may consider a prosecution against you. If you are found guilty, you will be liable to a fine or imprisonment (or both).

You have the right to appeal against this notice, by way of complaint for an order, to the Clerk to the Court of the Magistrates' Court acting for the petty sessions area in which your premises is located. If you wish to bring an appeal, you must do so within 21 days of the date this notice is served on you. The Magistrates' Court Act 1980 will apply to the proceedings. The bringing of an appeal will suspend the operation of this enforcement notice. An appeal against an enforcement notice served under Article 30 of the Regulatory Reform (Fire Safety) Order 2005 (as amended), may be brought on any grounds. These may include that you are aggrieved:

- a) by anything mentioned in the notice with respect to the premises concerned, or the relevant persons as defined by The Order, being a step which must be taken in order to comply with The Order; or
- b) by the period allowed by such a notice for the taking of any steps mentioned in it.

If at any time you wish to discuss the requirements of this notice, or are experiencing difficulty in carrying out the work, please contact **Inspecting Officer** [REDACTED]

Signed:

[REDACTED]

Assistant Commissioner
(The Officer appointed for the purpose)

Dated: 2 October 2024

The contents of this notice are without prejudice to any requirements or recommendations that may be made by the Commissioner under the Petroleum (Consolidation) Regulations 2014, or either the local authority or the Health and Safety Executive under any other Act of Parliament or Regulation for which they are the enforcing authority. Approval will normally be required under the Building Regulations for any building works for which you are obliged to notify the local Building Control Officer under the Building Regulations 2010 or an Approved Inspector under the Building (Approved Inspectors etc) Regulations, 2010.

Reply to Inspecting Officer [REDACTED]
Direct T 0208 555 1200 [REDACTED]
FSR-AdminSupport@london-fire.gov.uk

Encl: FS03_01a, FS03_01b, FS03_06

Cc: [REDACTED]@livingcity.co.uk
[REDACTED]@livingcity.co.uk
[REDACTED]@bromley.gov.uk
[REDACTED]@hse.gov.uk

ENVIRONMENT AND SAFETY INFORMATION ACT 1988

SECTION 4 - PROTECTION OF TRADE SECRETS

The above Act requires the London Fire Commissioner to maintain public registers of notices issued under Article 30 of the Regulatory Reform (Fire Safety) Order 2005 (as amended), (other than those which impose requirements or prohibitions solely for the protection of persons at work) and Sections 21 and 22 of the Health and Safety at Work etc, Act 1974.

Provisions are made within the Act for persons on whom the above notices are served to appeal against any proposed entry in the register which may disclose "trade secrets" or "secret manufacturing processes".

Entries in the register are required to be made after the period for appeal against the notice expires or after any appeal is disposed of.

If you feel that any such entry would disclose information about a trade secret or secret manufacturing process you may write to the Commissioner within a period of 14 days following the service of the notice, requesting exclusion of these details (see Section 4 of the 1988 Act).

Notes relating to Schedule of Fire Safety Audit Observations attached to this notice.

Important information to consider before taking remedial steps:

1. Words written in BLOCK CAPITALS in the attached schedule are standard terms defined in "Definitions of standard terms used in means of escape requirements" which form part of this schedule.
2. Officers of the Commissioner may visit your premises during the course of the notice, to ensure the dates within this plan are being followed.
3. Notwithstanding any consultation undertaken by the Commissioner, **before** you make any alterations to the premises, **you** must apply for local authority building control department approval (and/or the approval of any other bodies having a statutory interest in the premises) if their permission is required for those alterations to be made.
4. There may be suitable alternative safety measures to those detailed in the attached schedule, which would meet the requirements of The Order. If you wish to propose or discuss any alternative measures you should get in touch with the person named as the contact above, before you take any action, to ensure that your proposed measures are deemed satisfactory by the Commissioner.
5. Remedial steps must be undertaken by a competent person who has sufficient training, experience, knowledge or other qualities to enable him or her to properly undertake them.
6. We recommend that remedial steps are undertaken in accordance with the appropriate British or European Standards, or recognised industry guidance.

SCHEDULE

PREMISES: Brouard Court, 13 St Mark's Square, Bromley BR2 9YF

FILE NUMBER: 92/259154

This schedule should be read in conjunction with the Commissioner's Notice dated **2 October 2024**.

The condition(s) specified in the Regulatory Reform (Fire Safety) Order 2005 (as amended), were being contravened and the following step(s) need(s) to be taken in order to comply with the above legislation:

Article	Area of Concern	Steps Considered necessary to remedy the contravention.
Article 11	At the time of the audit your preventative and protective measures had not been planned, organised, controlled, monitored or reviewed where required. It was found that: 1) You had not planned and organised dates to implement significant findings of the fire risk assessment. During the inspection, it was noted that no adequate decisions had been made how to address the issues with the timber lined balconies since the external wall review in 2020, nor any steps had been taken since the fire in 2022 to prevent a similar fire incident from recurring. 2) The sharing of building information electronically via the LFB High Rise Portal had not been planned or organised as per the requirements of The Fire Safety (England) Regulations 2022. 3) You had not planned and organised the displaying of wayfinding signage. Signage should conform to the specifications and location set out in paragraph 15.14 to 15.16 of Approved Document B Volume 1 2019 edition incorporating 2020 amendments.	Arrangements identified as not suitably addressed must be effectively planned, organised, controlled, monitored or reviewed.

Article 11 continued	4) You had not planned and organised the provision of documents for the use by the Fire and Rescue Service that is required under the Fire Safety (England) Regulations 2022. These documents are to be provided within the secure information box.	
Article 22	At the time of the audit you had not cooperated and coordinated with other responsible persons. It was found that: 1) You do not have arrangements in place for coordinating and cooperating with other responsible persons /duty holders to ensure that site specific fire risk assessments are being carried out. 2) You do not have arrangements in place for coordinating and cooperating with other responsible persons /duty holders to ensure the required provision of information to the fire and rescue service as per the Fire Safety (England) Regulations 2022 are being implemented.	You must take all reasonable steps to cooperate and coordinate with other responsible persons/duty holders. With specific consideration given to the provision of site specific fire risk assessments and supplying the fire and rescue service with the required information via electronic format as per the Fire Safety (England) Regulations 2022.
Article 8	At the time of the audit the general fire precautions as identified in the significant findings of your fire risk assessment had not been implemented. It was found that the fire risk assessment identified that all balconies present a risk of fire spread, and no evidence was provided to demonstrate that action had been taken within the recommended timescales	Implement the significant findings of your fire risk assessment, in particular the significant findings of the fire risk assessment in relation to balconies throughout the premises. Given the history of fire, a permanent and robust solution must be found to address the issues with balconies. It is strongly recommended that the timber used in the construction and lining on all balconies are removed and replaced with materials of limited combustibility
Article 8	At the time of the audit the general fire precautions required to prevent fire and smoke spread via shafts, risers or ducting were inadequate. It was found that there are compartmentation breaches within the building, which promoted the fire to spread.	Take the general fire precautions required to prevent fire and smoke spread by reviewing standards of compartmentation throughout the premises to ensure that any breaches, including breaches in the balconies and breaches that extend into the building, are remedied to the required standards to prevent vertical fire spread.

Article 8 continued	Due to the intrusive nature of the recent fire, it was evident that no fire collars had been provided to seal the rainwater pipework, which penetrated from one balcony to another and extended into the building. It was also evident that the rainwater pipework was made of combustible material (plastic). This caused fire to spread vertically.	
Article 9	At the time of the audit the fire risk assessment for your premises was not suitable and sufficient. It was found that: 1) It had not considered the level of combustibility of materials used in the construction and lining of all balconies. It has also failed to consider the combustibility of the rainwater pipework, which penetrates from one balcony to another and extends into the building. It does not assess the consequences of the missing fire collars around the rainwater pipework. It has been evident from the fires that the materials used on the balconies and the rainwater pipework failed and promoted the fire spread not only externally, but also internally into the flats. 2) It failed to take into account that the fire retardant treatment has not been successful. This is evident from the balcony fires that spread from one balcony to another. 3) It had not determined the consequences of extending the automatic water fire suppression system onto the balconies. For instance, freezing of pipes in extremely cold weather conditions had not been considered.	The fire risk assessment should be reviewed, with specific consideration given to : 1) The fire risk appraisal of the external wall system, including the level of combustibility of materials used in the construction of the balconies throughout the premises, and the suitability and quality of installation of the rainwater pipes penetrating these balconies. 2) The suitability of the fire retardant treatment of the balconies throughout the premises and assessment of whether treating them is achievable. 3) The consequences and practicality of extending the automatic water fire suppression system in case of extremely cold weather conditions.

Article 9 continued	4) It had not been specific to this premises and covers multiple blocks with different risks. 5) the risks to relevant persons posed by the external wall façade which includes the timber balconies, as only the roof was taken into account as part of the 2020 façade report, carried out by Jason Hill of F.I.R.E Consultancy.	4) The fire risk assessment is specific to the premises. 5) Considerations given to the risks to relevant persons posed by the external wall façade which includes the timber balconies.
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*****RECOMMENDATIONS NOT FORMING REQUIREMENTS OF THE SCHEDULE*****

The Commissioner would strongly urge that you consider the presence of combustible façade cladding materials as part of the risk assessment process for these premises. All relevant information about any replacement window and facade schemes should be made fully available to fire risk assessors. Where no reliable information is available for a given property, a strategy to assess the risk and where necessary implement short, medium and long term actions to address the risk should be implemented.

Where remedial measures are to be undertaken to which consultation requirements under Section 20 of the Landlord and Tenant Act 1985 will apply, the Commissioner would urge you to consider application of the disapplication provisions under Section 20ZA of that Act.

The Company Secretary
Cathedral (Bromley 2) Limited
100 Victoria Street
London
SW1E 1JL

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

Date 2 October 2024
Our Ref 92/259153/[REDACTED]

ENFORCEMENT NOTICE

**Notice requiring steps to be taken under Article 30 of the
Regulatory Reform (Fire Safety) Order 2005 (as amended)**

TO :

Name: **Cathedral (Bromley 2) Limited**

Address: **100 Victoria Street, London SW1E 1JL**

Concerning Premises at: **Varney Court, 10 St Mark's Square, Bromley BR2 9YD**

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 (as amended), hereafter referenced as ('The Order') in London.

I [REDACTED] Assistant Commissioner (Fire Safety) on behalf of the Commissioner hereby give you notice that the Commissioner is of the opinion that you, as a person being under an obligation to do so, have failed to comply with the duties placed upon you by the Regulatory Reform (Fire Safety) Order 2005 (as amended) (The Order) in respect of the above named premises, the relevant persons who may be on the premises or who may be affected by a fire on the premises.

The matters which, in the opinion of the Commissioner, constitute the failure(s) to comply with The Order are specified in the Schedule of Fire Safety Observations attached to this notice. The Commissioner is further of the opinion that the steps identified in the schedule to this notice must be taken to remedy the specified failure(s) and comply with The Order.

The relevant extracts of the legislation are attached.

There may be suitable alternative safety measures, to those detailed in this notice that would meet the requirements of The Order. If you wish to propose or discuss any alternative measures you should contact the person named below, before you take any action, to ensure that your proposed measures will be deemed satisfactory by the Commissioner.

The steps must be taken by **1 April 2026** (or such extension if granted by the Commissioner).

Unless the steps identified in the schedule attached to this notice have been complied with, or such other steps are taken to remedy the failures in consultation with the Commissioner, you will be deemed not to have complied with this notice.

If you fail to comply with the requirements of this notice, you may have committed an offence. The Commissioner may consider a prosecution against you. If you are found guilty, you will be liable to a fine or imprisonment (or both).

You have the right to appeal against this notice, by way of complaint for an order, to the Clerk to the Court of the Magistrates' Court acting for the petty sessions area in which your premises is located. If you wish to bring an appeal, you must do so within 21 days of the date this notice is served on you. The Magistrates' Court Act 1980 will apply to the proceedings. The bringing of an appeal will suspend the operation of this enforcement notice. An appeal against an enforcement notice served under Article 30 of the Regulatory Reform (Fire Safety) Order 2005 (as amended), may be brought on any grounds. These may include that you are aggrieved:

- a) by anything mentioned in the notice with respect to the premises concerned, or the relevant persons as defined by The Order, being a step which must be taken in order to comply with The Order; or
- b) by the period allowed by such a notice for the taking of any steps mentioned in it.

If at any time you wish to discuss the requirements of this notice, or are experiencing difficulty in carrying out the work, please contact **Inspecting Officer** [REDACTED]

Signed:


[REDACTED]

Dated: 2 October 2024

Assistant Commissioner
(The Officer appointed for the purpose)

The contents of this notice are without prejudice to any requirements or recommendations that may be made by the Commissioner under the Petroleum (Consolidation) Regulations 2014, or either the local authority or the Health and Safety Executive under any other Act of Parliament or Regulation for which they are the enforcing authority. Approval will normally be required under the Building Regulations for any building works for which you are obliged to notify the local Building Control Officer under the Building Regulations 2010 or an Approved Inspector under the Building (Approved Inspectors etc) Regulations, 2010.

Reply to Inspecting Officer [REDACTED]
Direct T 0208 555 1200 [REDACTED]
FSR-AdminSupport@london-fire.gov.uk

Encl: FS03_01a, FS03_01b, FS03_06

Cc: [REDACTED]@livingcity.co.uk
[REDACTED]@livingcity.co.uk
[REDACTED]@bromley.gov.uk
[REDACTED]@hse.gov.uk

ENVIRONMENT AND SAFETY INFORMATION ACT 1988

SECTION 4 - PROTECTION OF TRADE SECRETS

The above Act requires the London Fire Commissioner to maintain public registers of notices issued under Article 30 of the Regulatory Reform (Fire Safety) Order 2005 (as amended), (other than those which impose requirements or prohibitions solely for the protection of persons at work) and Sections 21 and 22 of the Health and Safety at Work etc, Act 1974.

Provisions are made within the Act for persons on whom the above notices are served to appeal against any proposed entry in the register which may disclose "trade secrets" or "secret manufacturing processes".

Entries in the register are required to be made after the period for appeal against the notice expires or after any appeal is disposed of.

If you feel that any such entry would disclose information about a trade secret or secret manufacturing process you may write to the Commissioner within a period of 14 days following the service of the notice, requesting exclusion of these details (see Section 4 of the 1988 Act).

Notes relating to Schedule of Fire Safety Audit Observations attached to this notice.

Important information to consider before taking remedial steps:

1. Words written in BLOCK CAPITALS in the attached schedule are standard terms defined in "Definitions of standard terms used in means of escape requirements" which form part of this schedule.
2. Officers of the Commissioner may visit your premises during the course of the notice, to ensure the dates within this plan are being followed.
3. Notwithstanding any consultation undertaken by the Commissioner, **before** you make any alterations to the premises, **you** must apply for local authority building control department approval (and/or the approval of any other bodies having a statutory interest in the premises) if their permission is required for those alterations to be made.
4. There may be suitable alternative safety measures to those detailed in the attached schedule, which would meet the requirements of The Order. If you wish to propose or discuss any alternative measures you should get in touch with the person named as the contact above, before you take any action, to ensure that your proposed measures are deemed satisfactory by the Commissioner.
5. Remedial steps must be undertaken by a competent person who has sufficient training, experience, knowledge or other qualities to enable him or her to properly undertake them.
6. We recommend that remedial steps are undertaken in accordance with the appropriate British or European Standards, or recognised industry guidance.

SCHEDULE

PREMISES: Varney Court, 10 St Mark's Square, Bromley BR2 9YD

FILE NUMBER: 92/259153

This schedule should be read in conjunction with the Commissioner's Notice dated **2 October 2024**.

The condition(s) specified in the Regulatory Reform (Fire Safety) Order 2005 (as amended), were being contravened and the following step(s) need(s) to be taken in order to comply with the above legislation:

Article	Area of Concern	Steps Considered necessary to remedy the contravention.
Article 11	At the time of the audit your preventative and protective measures had not been planned, organised, controlled, monitored or reviewed where required. It was found that: 1) You had not planned and organised dates to implement significant findings of the fire risk assessment. During the inspection, it was noted that no adequate decisions had been made how to address the issues with the timber lined balconies since the external wall review in 2020, nor any steps had been taken since the fire in 2022 to prevent a similar fire incident from recurring. 2) The sharing of building information electronically via the LFB High Rise Portal had not been planned or organised as per the requirements of The Fire Safety (England) Regulations 2022. 3) You had not planned and organised the displaying of wayfinding signage. Signage should conform to the specifications and location set out in paragraph 15.14 to 15.16 of Approved Document B Volume 1 2019 edition incorporating 2020 amendments.	Arrangements identified as not suitably addressed must be effectively planned, organised, controlled, monitored or reviewed.

Article 11 continued	4) You had not planned and organised the provision of documents for the use by the Fire and Rescue Service that is required under the Fire Safety (England) Regulations 2022. These documents are to be provided within the secure information box.	
Article 22	At the time of the audit you had not cooperated and coordinated with other responsible persons. It was found that: 1) You do not have arrangements in place for coordinating and cooperating with other responsible persons /duty holders to ensure that site specific fire risk assessments are being carried out. 2) You do not have arrangements in place for coordinating and cooperating with other responsible persons /duty holders to ensure the required provision of information to the fire and rescue service as per the Fire Safety (England) Regulations 2022 are being implemented.	You must take all reasonable steps to cooperate and coordinate with other responsible persons/duty holders. With specific consideration given to the provision of site specific fire risk assessments and supplying the fire and rescue service with the required information via electronic format as per the Fire Safety (England) Regulations 2022.
Article 8	At the time of the audit the general fire precautions as identified in the significant findings of your fire risk assessment had not been implemented. It was found that the fire risk assessment identified that all balconies present a risk of fire spread, and no evidence was provided to demonstrate that action had been taken within the recommended timescales	Implement the significant findings of your fire risk assessment, in particular the significant findings of the fire risk assessment in relation to balconies throughout the premises. Given the history of fire, a permanent and robust solution must be found to address the issues with balconies. It is strongly recommended that the timber used in the construction and lining on all balconies are removed and replaced with materials of limited combustibility
Article 8	At the time of the audit the general fire precautions required to prevent fire and smoke spread via shafts, risers or ducting were inadequate. It was found that there are compartmentation breaches within the building, which promoted the fire to spread.	Take the general fire precautions required to prevent fire and smoke spread by reviewing standards of compartmentation throughout the premises to ensure that any breaches, including breaches in the balconies and breaches that extend into the building, are remedied to the required standards to prevent vertical fire spread.

Article 8 continued	Due to the intrusive nature of the recent fire, it was evident that no fire collars had been provided to seal the rainwater pipework, which penetrated from one balcony to another and extended into the building. It was also evident that the rainwater pipework was made of combustible material (plastic). This caused fire to spread vertically.	
Article 9	At the time of the audit the fire risk assessment for your premises was not suitable and sufficient. It was found that: 1) It had not considered the level of combustibility of materials used in the construction and lining of all balconies. It has also failed to consider the combustibility of the rainwater pipework, which penetrates from one balcony to another and extends into the building. It does not assess the consequences of the missing fire collars around the rainwater pipework. It has been evident from the fires that the materials used on the balconies and the rainwater pipework failed and promoted the fire spread not only externally, but also internally into the flats. 2) It failed to take into account that the fire retardant treatment has not been successful. This is evident from the balcony fires that spread from one balcony to another. 3) It had not determined the consequences of extending the automatic water fire suppression system onto the balconies. For instance, freezing of pipes in extremely cold weather conditions had not been considered.	The fire risk assessment should be reviewed, with specific consideration given to : 1) The fire risk appraisal of the external wall system, including the level of combustibility of materials used in the construction of the balconies throughout the premises, and the suitability and quality of installation of the rainwater pipes penetrating these balconies. 2) The suitability of the fire retardant treatment of the balconies throughout the premises and assessment of whether treating them is achievable. 3) The consequences and practicality of extending the automatic water fire suppression system in case of extremely cold weather conditions.

Article 9 continued	4) It had not been specific to this premises and covers multiple blocks with different risks. 5) the risks to relevant persons posed by the external wall façade which includes the timber balconies, as only the roof was taken into account as part of the 2020 façade report, carried out by Jason Hill of F.I.R.E Consultancy.	4) The fire risk assessment is specific to the premises. 5) Considerations given to the risks to relevant persons posed by the external wall façade which includes the timber balconies.
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*****RECOMMENDATIONS NOT FORMING REQUIREMENTS OF THE SCHEDULE*****

The Commissioner would strongly urge that you consider the presence of combustible façade cladding materials as part of the risk assessment process for these premises. All relevant information about any replacement window and facade schemes should be made fully available to fire risk assessors. Where no reliable information is available for a given property, a strategy to assess the risk and where necessary implement short, medium and long term actions to address the risk should be implemented.

Where remedial measures are to be undertaken to which consultation requirements under Section 20 of the Landlord and Tenant Act 1985 will apply, the Commissioner would urge you to consider application of the disapplication provisions under Section 20ZA of that Act.

The Company Secretary
Cathedral (Bromley) Limited
100 Victoria Street
London
SW1E 5JL

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

Date 6 June 2023
Our Ref 92/259153/

Dear Sir/Madam

REGULATORY REFORM (FIRE SAFETY) ORDER 2005 (as amended)

Premises: Varney Court, 10 St. Mark's Square, Bromley, BR2 9YD

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 (as amended) (The Order) in London.

Further to the recent inspection by an authorised officer I confirm that the works specified in the Enforcement Notice dated **12 October 2022**, issued by the Commissioner in respect of the above mentioned premises have been satisfactorily completed within the specified time limit. The Enforcement Notice has been complied with and at the time of the inspection the premises were deemed to comply with the above Order.

Should the circumstances change in the future affecting the risk to persons in case of fire, a further risk assessment of the premises should be carried out and the findings addressed. The law requires that if you have:

- 5 or more employees,
- a licence under an enactment in force in respect of the premises, or
- an alterations notice in force requiring such,

your risk assessment should be recorded and made available for future inspection in order to ensure continued compliance with the Order.

Any queries regarding this letter should be addressed to the person named below. If you are dissatisfied in any way with the response given, please ask to speak to the Team Leader quoting our reference.

[REDACTED]

FSR-AdminSupport@london-fire.gov.uk

Direct T 020 8555 1200

 livingcity.co.uk