

The Company Secretary
Amrit Holdings Co. Limited
Hallswelle House
1 Hallswelle Road
London
NW11 0DH

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

Date 20 January 2025
Our Ref 02/014067/LB

ENFORCEMENT NOTICE

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

TO :

Name: **Amrit Holdings Co. Limited**

Address: **Hallswelle House, 1 Hallswelle Road, London NW11 0DH**

Concerning Premises at: **Karridale Mansions, 72 Tottenham Court Road, London W1T 2HE**

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 Craig Carter, 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 **19 January 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 ^{2.1} notice, or are experiencing difficulty in carrying out the work, please contact **Inspecting Officer** [REDACTED]

^{2.2}

Signed:

[REDACTED]

Dated: 20 January 2025

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.

3.1
Reply to Inspecting Office
3.2
Direct T 020 8555 1200 ext
FSR-AdminSupport@london-fire.gov.uk

Encl: FS03_01a
FS03_01b
FS03_06

3.3
Cc: @hornseyestates.com
3.4
@camden.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: Karridale Mansions, 72 Tottenham Court Road, London W1T 2HE

FILE NUMBER: 02/014067

This schedule should be read in conjunction with the Commissioner's Notice dated **20 January 2025**.

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) Outstanding findings from the most recent fire risk assessment have not been monitored, reviewed, planned or organised. 2) Scheduled maintenance of residents flat front doors has not been reviewed, monitored, planned or organised. 3) Scheduled maintenance of the emergency lighting system in accordance with BS5266-1 guidance, has not been reviewed, monitored, planned or organised. 4) Fire Safety England regulations 2022 requirements for high rise buildings has not been, reviewed, monitored, planned or 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: 1) Access to the secondary	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: 1) Risk assessing the suitability of secondary means of

Article 14 continued.	means of escape is gained through residents bathroom windows, however, flats 1A and 2A on the first floor cannot gain access to the secondary means of escape as metal bars have been installed within the window frames preventing access. 2) Windows and openings on to the external means of escape metal staircase did not comply with ADBv1 guidance recommendations, windows and openings were constructed of non fire rated materials and did not provide 30 minutes FIRE RESISTANT separation to the means of escape and should be fixed shut, 1.8m horizontally, 9m vertically and 1.1m above top landing of the external metal staircase.	escape access, especially 1st floor flats, 1A and 2A. 2) Reviewing the suitability of windows and openings onto the external secondary means of escape, to comply with ADBv1 guidance recommendations for external means of escape.
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. Sampled doors to flats 7 and 8 did not fully close on their self	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 continued.	closing device. Sampled flat doors did not have intumescent strips and cold smoke seals fitted in accordance with British Standard 476 or BS EN 1634. All sampled door frames were showing signs of wear and tear and had significant gaps exceeding 5mm between door and frame.	
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 emergency Lighting has not been serviced in accordance with BS5266-1 guidance recommendations. The system should be serviced annually.	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 servicing the emergency lighting system annually, in accordance with BS5266-1 recommendations.
Article 8	At the time of the audit the FIRE RESISTING separation in your premises was inadequate. It was found that: 1) Fire stopping within mains gas intake cupboard on mezzanine landing between ground and first floor was not suitable and sufficient, service pipework holes were observed penetrating through floors leaving large gaps and holes which had not been adequately fire stopped with FIRE RESISTANT fillers. 2) Fire stopping within ground floor mezzanine landing pump room was not suitable and sufficient, drain pipe and water supply pipework had not been filled with suitable fire resistant fillers to fire stop all gaps and holes where pipework passed through the floor.	Provide suitable FIRE RESISTING separation by: 1-2) Carrying out a fire stopping survey and associated remedial works, using suitable FIRE RESISTANT fillers, fixings and intumescent closing devices. All works to be carried out by competent persons.
Article 8	At the time of the audit the general fire precautions as identified in the significant findings of your fire risk	Implement the significant findings of your fire risk assessment, in particular:

Article 8 continued.	assessment had not been implemented. It was found that the following findings have not been completed within the time frames set by the assessor: 1) It is a legal requirement to register high rise residential buildings that are at least 7 floors high, or 18 metres tall or higher, with two or more residential units by 1 October 2023. 2) The Fire Safety (England) Regulations 2022 state that the specified electronic records in regulations 5 and 6 should be provided to the fire and rescue service. 3) The route from the external escape through to Goodge Street Station narrows from 700mm to 350mm because of the location of a drain pipe. 4) There was no evidence that the main external staircase has been examined by a competent person. The main external staircase appears to be in a poor state of repair. 5) Cable penetrations outside some flats. 6) Cable and pipe penetrations in the pump room. 7) Any update or addition to the electrical system must ensure that all cables are adequately supported using non combustible fixings to prevent premature collapse in the event of a fire. 8) It is recommended that a secure information box is wall mounted inside the front entrance and should be at least 1.4m from the ground.	1-2) Registering the high rise premises on the Building Safety Regulator and London Fire Brigade portals web page, as set out in the fire safety England regs 2022. 3) Reviewing the external means of escape route widths, making necessary adjustments to achieve compliance with ADBv1 or BS9991 guidance recommendations. 4) Reviewing and surveying the general state of repair of the external vertical means of escape stair running up the rear of the building. Carrying out remediation as necessary and setting up a regular schedule of inspection and maintenance. 5-6) Filling in all service holes, penetrations and gaps along the means of escape, service cupboards and service rooms with FIRE RESISTANT fillers to stop the spread of smoke and heat in the event of a fire. 7) Suitably housing all electrical cabling within the means of escape, service cupboards and service rooms in suitable fire resistant cable trunking and cable trays. 8) Installing a secure information box, preferably to the outside of the building for the use of London Fire Brigade staff, following Fire Safety England 2022 and NFCC guidance recommendations for content requirements.
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Article 9	At the time of the audit the fire risk assessment for your premises was not suitable and sufficient. It was found that the fire risk assessor had not identified or considered: 1) Suitability of the fire alarm and detection system to achieve the evacuation strategy following NFCC guidance for temporary change of strategy to simultaneous evacuation in residential high rise buildings. 2) First floor flats 1A and 2A cannot access the secondary means of escape due to metal bars being installed in bathroom access windows. 3) Windows and openings along the secondary means of escape metal stair did not comply with Approved Document B for FIRE RESISTANT materials and horizontal/vertical distance requirements from the escape route.	The fire risk assessment should be reviewed, with specific consideration given to: 1) Reviewing the current fire alarm system to comply with NFCC guidance for simultaneous evacuation in residential high rise blocks. 2) Reviewing the secondary means of escape window access for flats 1A and 2A on the first floor. 3) Reviewing the suitability of windows and openings along the secondary means of escape to comply with ADBv1 guidance recommendations for external openings on to the means of escape.
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*****RECOMMENDATIONS NOT FORMING REQUIREMENTS OF THE SCHEDULE*****

The Commissioner would strongly urge that you consider the presence of combustibile 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.

[End of document]

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