LONDON FIRE BRIGADE

London Fire Brigade Headquarters
169 Union Street London SE1 0LL
T 020 8555 1200
london-fire.gov.uk

Freedom of Information request: Reference number FOI2026/01262

Date of request: 5th October

Request:

Information Request – 2017 Enforcement Notice – Rennie Court, 11 Upper Ground, London SE1

I am writing to request information held by the London Fire Brigade concerning fire-safety enforcement action at Rennie Court, 11 Upper Ground, London SE1.
Contemporaneous reporting by Inside Housing states that the London Fire Brigade served an enforcement notice in respect of Rennie Court in August 2017 on Kings Reach Flats Management.
I would be grateful if you could provide the following information and records held by LFB in relation to that enforcement action:

1. The August 2017 Enforcement Notice
A complete copy of the enforcement notice served in August 2017 in respect of Rennie Court, including any schedules, appendices or other documents forming part of the notice.

2. Fire-safety deficiencies identified
Any Notification of Deficiencies, schedule of deficiencies or other document recording the fire-safety deficiencies identified by LFB in connection with the inspection/audit which resulted in the August 2017 enforcement notice.
In particular, I am seeking any recorded information identifying the nature and location of the deficiencies and whether these concerned or included:

* compartmentation or fire-resisting separation;
* fire-stopping;
* concealed spaces or voids;
* service penetrations;
* service risers, shafts or vertical service arrangements; and/or
* conditions within individual residential flats.

3. Fire Safety Audit
Please provide the outcome and recorded findings of the Fire Safety Audit or inspection which resulted in the August 2017 enforcement notice, including the date of the inspection/audit and its recorded outcome or classification.
If LFB considers that the underlying Fire Safety Audit report itself is exempt from disclosure, please nevertheless provide any non-exempt information capable of being disclosed from it, together with the applicable exemption and reasons for withholding the remainder.

4. Action taken in response to the Enforcement Notice
Please provide any records identifying the remedial action which Kings Reach Flats Management stated or demonstrated had been undertaken in response to the enforcement notice, including any:

* schedule of remedial works;
* response to the enforcement notice;
* evidence or notification of compliance;
* subsequent inspection or revisit record;
* record of outstanding items; and
* record confirming whether and when LFB considered the requirements of the enforcement notice to have been complied with.

5. Subsequent inspection and closure/compliance
Please provide the date and outcome of any subsequent LFB inspection, audit or review undertaken to establish whether the requirements of the August 2017 enforcement notice had been complied with. Please also provide any record confirming the eventual status or outcome of the enforcement notice, including the date upon which LFB recorded the required remedial action as completed or otherwise considered the matter concluded, if such a record is held.

6. Scope of inspection – residential flats and compartmentation
Please provide any recorded information showing:

* whether individual residential flats within Rennie Court were inspected in connection with the 2017 inspection, enforcement action or subsequent compliance process and, if so, which flats were inspected;
* the areas of the building included within the scope of the inspection/audit;
* whether compartmentation, fire-stopping, concealed spaces or voids, service penetrations, service risers, shafts or other vertical service arrangements within individual flats were within the scope of the inspection/audit or subsequent remedial verification;
* whether any subsequent inspections or visits were undertaken and, if so, their scope and outcome; and
* whether any intrusive inspection, compartmentation survey or other specialist fire-safety investigation was undertaken or considered.

For clarity, I am seeking recorded information already held by LFB and am not asking LFB to provide a new technical opinion or undertake any new assessment.
If any of the requested information is withheld in whole or in part, please identify the relevant statutory exception or exemption and provide the remainder of the information to the extent that it can reasonably be separated from exempt material.
If any requested document or information is no longer held, I would be grateful if you could confirm that fact.
I am happy for this request to be considered under the Freedom of Information Act 2000 and/or the Environmental Information Regulations 2004, as LFB considers appropriate.

Response:

Thank you for your request for information relating to the Enforcement Notice issued in respect of Rennie Court in August 2017.

The London Fire Brigade can confirm that it holds recorded information falling within the scope of your request.

Following searches of our records, we have identified the following documents, copies of which are enclosed with this response:

- Enforcement Notice dated 17 August 2017.

- Letter granting an extension of time in relation to the Enforcement Notice dated 21 February 2018.

- Fire Safety Audit record dated 3 July 2018, recording the premises as Broadly Compliant.

- Compliance letter issued to the Responsible Person dated 15 July 2018, confirming that the requirements of the Enforcement Notice had been addressed and that the matter had been concluded.

These documents contain the information held by the Brigade regarding the enforcement action taken, the subsequent regulatory activity undertaken and the eventual compliance outcome.

Some information has been redacted from the enclosed documents under Section 40(2) of the Freedom of Information Act 2000 as it constitutes the personal data of third parties. Disclosure of this information would contravene the data protection principles set out in the UK General Data Protection Regulation and the Data Protection Act 2018.

The Brigade also holds additional information relating to its regulatory activities at the premises, including the full Fire Safety Audit report, correspondence between the Brigade and the Responsible Person, records provided to the Brigade by the Responsible Person, inspection notes, internal correspondence and other supporting fire safety information.

This information is exempt from disclosure under Section 31(1)(g) of the Freedom of Information Act 2000, by virtue of Sections 31(2)(a) and 31(2)(c), which relate to the exercise of functions for the purposes of ascertaining whether any person has failed to comply with the law and whether circumstances exist which would justify regulatory action.

The London Fire Brigade recognises the public interest in understanding the fire safety arrangements of buildings and in transparency regarding its enforcement activities. However, there is a strong public interest in protecting the Brigade's ability to carry out its regulatory functions effectively. The disclosure of detailed audit reports, supporting evidence, correspondence, inspection records and information provided during the course of regulatory engagement would be likely to prejudice the Brigade's regulatory functions by undermining the safe and candid exchange of information between enforcing authorities and those responsible for compliance with fire safety legislation.

The Brigade considers that the correct balance of the public interest is achieved by disclosing information relating to the enforcement action taken and its outcome, whilst withholding the supporting regulatory information gathered and created during the course of its investigations and enforcement activities. In addition, some of the withheld information was provided to the Brigade in circumstances giving rise to a duty of confidence and is therefore exempt under Section 41(1) of the Act.

In relation to the enforcement process, the Brigade holds a record confirming that an extension of time was granted on 21 February 2018, and a copy of the extension letter is enclosed. Any additional correspondence relating to that extension request is withheld under the exemptions outlined above.

The Brigade also holds records confirming the subsequent regulatory history of the Enforcement Notice. A Fire Safety Audit undertaken on 3 July 2018 recorded the premises as Broadly Compliant, and a compliance letter was issued to the Responsible Person on 15 July 2018 confirming that the outstanding matters had been satisfactorily addressed. The Enforcement Notice was subsequently closed on that basis.

Information relating to the detailed scope of the 2017 inspection, including whether individual flats were inspected and whether matters such as compartmentation, fire-stopping, concealed spaces, service penetrations, service risers or similar features formed part of the inspection activity, is contained within the Fire Safety Audit report. As explained above, that report is exempt from disclosure under Section 31(1)(g), by virtue of Sections 31(2)(a) and 31(2)(c) of the Freedom of Information Act 2000 and is therefore withheld.

Your request has been handled in accordance with the Freedom of Information Act 2000. Further information about requesting information from the London Fire Brigade is available on our website: https://www.london-fire.gov.uk/about-us/transparency/request-information-from-us/

LONDON FIRE
AND EMERGENCY
PLANNING AUTHORITY

169 Union Street
London SE1 0LL
T 020 8555 1200

Minicom 020 7960 3629
london-fire.gov.uk

The Company Secretary
Kings Reach Flats Management Ltd
Kings Reach Flats
11 Upper Ground
London
SE1 9LP

[redacted]

London Fire and Emergency Planning Authority runs the London Fire Brigade

Date 17 August 2017
Our Ref 91/00505[redacted]

ENFORCEMENT NOTICE

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

TO :

Name: **Kings Reach Flats Management Ltd**

Address: **Kings Reach Flats, 11 Upper Ground, London SE1 9LP**

Concerning Premises at: **Rennie Court, 11 Upper Ground, London SE1 9LP**

I [redacted] Assistant Commissioner (Fire Safety Regulation) on behalf of the London Fire & Emergency Planning Authority (the Authority) hereby give you notice that the Authority 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 (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 Authority, constitute the failure(s) to comply with the Order are specified in the Schedule of Fire Safety Observations attached to this notice. The Authority 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 Authority.

The steps must be taken by **30 November 2017** (or such extension if granted by the Authority).

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 Authority, 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 Authority 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, 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 [redacted]

Signed: [redacted] **Dated:** 17 August 2017

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 Authority 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.

[redacted]
[redacted]
[redacted]@london-fire.gov.uk

Encl: FS03_01a
FS03_01b
FS03_06

ENVIRONMENT AND SAFETY INFORMATION ACT 1988
SECTION 4 - PROTECTION OF TRADE SECRETS

The above Act requires the London Fire and Emergency Planning Authority to maintain public registers of notices issued under Article 30 of the Regulatory Reform (Fire Safety) Order 2005, (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 Fire Authority 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 Authority 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 fire authority, **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 Authority.

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: Rennie Court, 11 Upper Ground, London SE1 9LP

File Number: 91/005051

This schedule should be read in conjunction with the Authority's Notice dated **17 August 2017**.

The condition(s) specified in the Regulatory Reform (Fire Safety) Order 2005, 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 9(1)	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 assessment had not addressed or recorded:	The fire risk assessment should be reviewed, with specific consideration given to:
	1) The general information regarding the premises and its layout, including the podium level and ground floor area used by staff.	1) Providing a detailed description of the layout of the building.
	2) The fire safety provisions and/or systems that are present within the premises and their application.	2) The fire safety provisions and systems installed in the premises, including the sprinkler and fire detection and warning systems.
	3) The need for cooperation and coordination with the responsible person(s) of the neighbouring buildings regarding the shared emergency routes and exits and areas.	3) Ensuring that there is suitable co-operation and coordination between all the responsible persons that share emergency routes and exits.
	4) The prescribed emergency plan for the premises taking into account the different commercial and residential uses in the premises.	4) The emergency plan for the premises, including procedures for residents and person(s) working in the premises.
	5) The suitability of flat entrance doors as fire doors to provide 30 minutes FIRE RESISTING protection to the escape route.	5) The flat entrance doors and their suitability to ensure 30 minute FIRE RESISTANCE to the escape route.

Article 9(1) continued	6) That the smoke control system has been compromised by installing doors across the cross corridor ventilation grilles in the south block. 7) The potential for fire and/or smoke spread through the service riser cupboards through poor and/or inadequate fire stopping. 8) The signage required for the fire fighting facilities provided and their location within the premises.	6) The functionality of the smoke control system within the lift lobby areas of the south blocks. 7) The fire stopping of services that pass through the walls and ceilings within risers and cupboards. 8) The fire fighter facilities available and their various locations throughout the premises.
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) Fire stopping in service risers was inadequate. 2) No schedule to maintain passive fire protection, including fire doors, has been implemented. 3) There was poor waste management within the service risers, cupboards and behind ventilation grilles. 4) There was no evidence of portable appliance testing within the areas used by employees.	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) The safety signage installed on the emergency routes did not clearly indicate the direction of escape. 2) Some areas with the building did not have emergency escape lighting installed where borrowed lighting levels are inadequate. 3) A number of doors separating the stairways from the lift lobbies would be inadequate at preventing the spread of fire and/or smoke due to large gaps between the door leafs, glazing panels that are not fixed properly into the frame and self-closing devices that do not close the door leaf fully.	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) Providing adequate signage to clearly indicate the emergency routes and exits from the premises, including the podium level. 2) Ensuring there are emergency escape lighting provisions to the requirements of BS5266 part 1 in all areas without adequate borrowed lighting levels. 3) Ensuring all doors leading on to the protected stairways meet the fire resisting requirements of BS476 part 22 and prevent the spread of fire and/or smoke.
Article 17(1)	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: 1) The fire detection and warning system was showing a fault condition that could prevent and/or delay the detection or warning of a fire emergency. 2) A number of fire doors were found not to close fully into their frames due to issues with self-closing devices. 3) The glazed panels of some lobby fire doors in the south block were found to be loose.	Arrange initial and on-going maintenance to ensure fire safety measures are kept in an efficient state, working order and good repair. This can be achieved by: 1) Ensuring the fault on the fire alarm system is repaired and maintained in efficient working order. 2) Ensuring all fire door self-closing devices are repaired and maintained to ensure that all door leafs close fully into their frames. 3) Ensuring the integrity of all fire doors by making sure all glazed panels are repaired to meet the requirements of BS476 part 22.

Article 17(1)	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 ventilation of the PROTECTED ROUTE and/or required rectification of defects that have arisen in, and/or alterations made to the ventilation of the access route. The PROTECTED ROUTE has been compromised by overboarding of the permanently open ventilation system within the lobbies with a door thereby preventing effective ventilation of smoke and fumes in the event of fire.	Ensure the lobbies are returned to their intended state as a PROTECTED ROUTE to afford protection from fire in a flat to relevant persons who may require use of that lobby 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.
Article 17(1)	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.	Ensure the access lobbies are returned to their 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(1) continued	The PROTECTED ROUTE has been compromised by: 1) The fitting of flat entrance doors that do not provide 30 minutes fire protection to the access route. 2) Flat entrance doors that do not have self-closing devices installed. 3) Flat entrance doors that have large letter box apertures fitted that are not intumescent.	
Article 21	At the time of the audit your employees had not been provided with adequate safety training. It was found that the concierge staff had not received training in what actions and/or procedures to undertake in the event of a fire emergency.	Provide your staff with adequate safety training. In particular ensure all staff including the concierge are: 1) Aware of the actions and procedures to undertake in the event of a fire emergency. 2) Trained on how to operate the fire alarm panel, including testing and resetting the system. 3) Know and understand the fire fighter facilities including, fire fighter lifts, dry rising main inlets, sprinkler shut off valve and basement car park ventilation override and there locations.
Article 22	At the time of the audit you had not cooperated and coordinated with other responsible persons. It was found that the shared emergency routes and exits from the basement car park and podium level were locked and not available for use by relevant persons in the premises.	You must take all reasonable steps to cooperate and coordinate with other responsible persons. In particular, ensure all shared 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.
Article 38(1)	At the time of the audit a suitable system of maintenance of the fire fighting measures was not in place. It was found that dry rising main inlets for the three separate blocks were located in three separate streets and have inadequate identification signage.	Arrange initial and on-going maintenance to ensure fire fighting measures are kept in an efficient state, working order and good repair. This can be achieved by providing adequate identification signage adjacent to each dry rising main inlet.

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: 1) The breaches in compartmentation identified had not been fire stopped. 2) Electrical warning signs had not been displayed on the electrical service cupboards. 3) Storage of waste items, including combustible materials had not been removed from service cupboards. 4) Maintenance of self-closing devices for fire doors has not been carried out.	Implement the significant findings of your fire risk assessment, in particular: 1) Provide adequate fire protection to all breaches in fire stopping. 2) Install correct electrical hazard signage to BS5499 and the Health and Safety (Safety Signs and Signals) Regulations 1996 on all electrical service cupboards. 3) Ensure arrangements are in place to remove and prevent the storage of waste items and combustible materials in the service cupboards. 4) Carry out maintenance on all fire doors to ensure they close fully into their frames.
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 were numerous breaches in compartmentation within the service riser cupboards, where electrical cables and pipework pass through the walls and ceilings.	Take the general fire precautions required to prevent fire and smoke spread by ensuring all penetrations in compartments are adequately fire stopped to provide at minimum 30 minutes fire separation where services pass through holes in the ceilings and walls. 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.

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

The Authority 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 Authority would urge you to consider application of the disapplication provisions under Section 20ZA of that Act.

LONDON FIRE
AND EMERGENCY
PLANNING AUTHORITY

Fire Safety Regulation, South East 4 Team
169 Union Street London SE1 0LL
T 020 8555 1200[redacted]

Minicom 020 7960 3629
london-fire.gov.uk

The Company Secretary
Kings Reach Flats Management Ltd
Kings Reach Flats
11 Upper Ground
London
SE1 9LP

London Fire and Emergency Planning Authority runs the London Fire Brigade

Date 21st February 2018
Our Ref 91/005051[redacted]

EXTENSION OF TIME IN RESPECT OF ENFORCEMENT NOTICE

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

Premises: Rennie Court, 11 Upper Ground, London SE1 9LP

I refer to the Authority's enforcement notice dated **17th August 2017** when you were given notice of steps to be taken by **30th November 2017**.

You have since contacted the Authority to advise that you will be unable to complete the work within time allowed.

The time limit in which to deal with these outstanding matters has been extended to **31st May 2018**.

If at the end of the time limit the matters have not been rectified, further extensions of time will not be granted, except in exceptional circumstances, and consideration may be given to the initiation of legal proceedings.

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

[redacted]

LONDON FIRE BRIGADE - FIRE SAFETY REGULATION
Fire Safety Audit Summary

Audit Information

Audited By	[redacted]
Audit Completed	3 July 2018

Location Summary

File No:	91/005051
UPRN:	200003500709
Building Name:	RENNIE COURT
Address:	RENNIE COURT 11 UPPER GROUND LONDON SE1 9LP
Use:	D - Purpose Built Flats>=4 floors
Borough:	Southwark
Responsible Team:	FSR Southwark & Lewisham
Station Ground:	E34 - Dockhead
Risk Score:	5.5
Number of Floors:	Total: 11 Basement: 1
No. of Beds:	0
Special Features:	
Additional Detail:	
Environmental Risks:	
Site Reinspection Date:	2019-08-15
Heritage Building:	
Petroleum Redevelopment:	
Fire Fighter Risk:	Low

Inspected property summary

Occupier Contact:	
Address:	RENNIE COURT 11 UPPER GROUND LONDON SE1 9LP
Responsible Team:	FSR Southwark & Lewisham
Occupancy Type:	Occupier - multi or single occupancy
Use:	D - Purpose Built Flats>=4 floors
Valuation Office:	R3 - Flats/Mais 4 Flrs and over PB
Risk Score:	5.5
Total Capacity:	0
Maximum Number of people:	100 - 999

Property Size for Use:	Very Large In M²: 10301 to 12600

Environmental Risks:
Building features that may assist fire spread:
Flammable Materials
Stored:
Type:

Contacts

Contact Type	Managing Agent
Sole Supplier Risk	
Name	Kings Reach Management Ltd
Responsible Person	
Position	
Address	c/o A1 Company Services Ltd 788-790 Finchley Road London NW11 7TJ
Telephone	
Fax	
Email	
URL	
Contact Type	Occupier
Sole Supplier Risk	
Name	Default Property
Responsible Person	
Position	
Address	Rennie Court Upper Ground Kings Reach LONDON SE1
Telephone	
Fax	
Email	
URL	
Contact Type	On Site Representative
Sole Supplier Risk	
Name	Kings Reach Flats Management Ltd
Responsible Person	[redacted]
Position	Property Services Manager
Address	Rennie Court 11 Upper Ground LONDON SE1 9LP
Telephone	0207 620 3470
Fax	
Email	[redacted]@krfm.org.uk
URL	

Enforcement History

Infringements:

Type	Date	Prohibition Restriction Date	Prosecution Date
Art30 Enforcement	2017-08-17		

Articles

Article 9 - Risk Assessment

SAFETY CRITICAL
Has a suitable and sufficient Fire Safety Risk Assessment been carried out for the premises?

"The responsible person shall make a suitable and sufficient assessment of the risks to which relevant persons are exposed to identify the preventive & protective measures"

Compliance Level: Broadly Compliant

Observations: 03/07/2018 11:57: The current fire risk assessment was carried out by IFC Group 17th September 2017 with a partial re-inspection 30th April 2018 on completion of all remedial works. The fire risk assessment makes a thorough and detailed assessment of the fire risks within the premises. The fire risk assessment is suitable and sufficient and identifies the significant findings within an action plan, based on risk priority and with target dates for completion. 14/08/2017 11:09: A fire safety risk and Health and Safety assessment was carried out on the 15th June 20:.6 by 'Safety For Work' and has a review date of June 2017. There is a premises overview and an action plan indicating the hazard, risk and control measures required. However, the premises overview is does not provide any pertinent information on the premises such as design or lay out. The action plan fails to address some of the deficiencies found during the audit.

Article 11 - Fire Safety Arrangements

SAFETY CRITICAL
Is there effective Fire Safety Management?

"The responsible person shall make appropriate arrangements for the effective planning, organisation control, monitoring & review of preventive and protective measures"

Compliance Level:Broadly Compliant

Observations: 03/07/2018 12:06: Appropriate arrangements have been put in place for the preventive and protective measures. All fire stopping has been addressed using IFC approved intumescent sealant. IFC Group have, as noted in the fire risk assessment, have provided the Property Manager with advice on routine inspections of compartmentation and fire doors. The service risers and cupboards sampled were found cleared of stored items with a letter issued to all residents with regard to not using these areas for storage. The on site staff as part of their daily routine, now inspected these areas and notify the property manager of any items found in these areas. 14/08/2017 15:09: Electronic records of testing and maintenance where kept, however no fire log book was kept on site. There is a monthly removals of storage from lobbies within the blocks. However, this does not extend to risers and cupboards. The was no evidence of

	portable appliance or BS7671 electrical testing. The property managers office was using multi socket adaptors, the property manager ensures these are all switched off when the office is not in use. Fire alarm test carried out fortnightly. The residents newsletter has been used to reinforce the stay put policy and offers advice to residents smoke detectors in flats. Despite this some residents did not have any smoke detection installed

Article 17 - Maintenance

SAFETY CRITICAL **Are fire safety provisions being adequately maintained?**	*"Where necessary in order to safeguard the safety of relevant persons, the responsible person must ensure that the premises and facilities, equipment & devices provided. are subject to a suitable system of maintenance, in an efficient state, in efficient working order and in good repair"*
Compliance Level:Broadly Compliant	Observations: 03/07/2018 12:21: The fire alarm system has been repaired and returned to an efficient state, working order and good repair. There was no faults on the control indicating equipment. As discussed in Article 14, all repairs to fire doors have been carried out. There was no evidence of doors sampled, to show doors were not self-closing or that glazed vision panels were loose. A programme of works and inspection routine has been implemented by the responsible person to ensure that any door defects are highlighted and repaired in the future. 14/08/2017 11:37: The dry rising mains were last tested 19th April 2017 [redacted] (Fire Applinaces) Ltd and were found to be satisfactory. The same company maintained the portable fire fighting equipment, last done November 2016. The fire alarm system and emergency lighting was serviced by All London Fire 24th April 2017. Records of all these seen. The sprinkler system is in the process of being refurbished and upgraded at the time of the audit by Compco Fire System that was started July 2017. The fire alarm panel was showing a fault condition. An engineer has been call to investigate the fault of the system. A number of fire doors were found in poor condition, with damaged or poor functioning self-closing devices and glazing panels that were loose within the frame or the door leafs.

Article 38 - Maintenance of Measures Provided for Protection of Fire-Fighters Safety Critical

SAFETY CRITICAL **Are suitable arrangements in place to ensure that facilities, equipment and devices for use by or the protection of fire fighters are maintained in an efficient state, in efficient working order and in good repair?**	*"Where necessary.to safeguard the safety of fire-fighters in the event of fire, the responsible person must ensure.facilities, equipment and devices provided.use by or protection of fire-fighters.suitable system of maintenance.maintained.working order and in good repair"*

Compliance Level:Broadly Compliant	Observations: 03/07/2018 12:26: Signage has been added to all dry rising main inlet valves to clear identify the block that each feed. 14/08/2017 12:18: There are three dry rising mains, one supplying each block, that are regularly maintained by [redacted] (Fire Appliances) Ltd. However each inlet valve is located on a separate street and has no indication signage. As such any major road works such as those taking place on Rennie Street at the time of the audit, may affect appliance attendance. There are 3 'firemans' lifts within the premises, one for each block. There is a Colt mechanical ventilation system in the basement car park that has cyclone fans that vent C02 and C0.

Article 22 - Co-operation and co-ordination

Is there adequate co-operation and co-ordination between responsible persons where there are two or more sharing responsibilities or have duties in respect of premises?	*"Where two or more responsible persons share, or have duties in respect of, premises (Whether on a temporary or a permanent basis) each such person must, co-operate, Take all reasonable steps to co-ordinate necessary measures, and provide information"*
Compliance Level:Broadly Compliant	Observations: 03/07/2018 12:28: There is adequate co-operation and co-ordination between the parties who share responsibility in respect of the block. An e-mail chain between the Property Manager and CBRE Southbank manager in regards to the shared fire escape routes was seen during the re-visit that shows discussions and actions to take in ensuring all routes are available for all persons at all times. 14/08/2017 12:30: The block of flats shares some areas with the neighbouring office block managed by CBRE. These areas, that include the basement car park and the first floor podium level have shared emergency escape routes. At the time of the audit it was found that both these emergency exits was unavailable and locked from the office side, even though signage directed the residents and staff from Rennie Court to use these.

Article 21 - Training

SAFETY CRITICAL **Are employees being effectively trained?**	*"The responsible person must ensure that his employees are provided with adequate safety training"*

Compliance Level:Broadly Compliant	Observations: 03/07/2018 12:23: General fire safety training has been delivered by IFC Group to the property services manager and all staff. This was confirmed by questioning the head concierge in regards to action to undertake in response to a fire emergency. 14/08/2017 11:18: After discussion with the on site concierge staff, it was clear no staff training has been undertake. This was confirmed by the property manager who informed that the staff were to receive training on the fire alarm system in August.

Article 14 - Emergency routes and exits

SAFETY CRITICAL Is effective means of escape provided and maintained?	*"Where necessary to safeguard the safety of relevant persons in case of fire the responsible person must ensure that routes to emergency exits, and exits, are kept clear at all times and where required, to be adequately illuminated by emergency lighting"*
Compliance Level:Broadly Compliant	Observations: 03/07/2018 12:17: There is an effective means of escape provided and maintained. A number of fire exits signs have been removed or replaced where necessary within the building. This has had the impact of simplifying the escape routes, especially on the ground floor and podium levels. Emergency escape lighting is confirmed, as per the fire risk assessment, as being installed through all circulation spaces, including stairs, stair lobbies and ground floor corridors. A number of repairs have been carried out to the fire doors, with a programme of works in place to continue repairs and replacements. There was no evidence of fire doors sampled that any were in a poor state of repair. 15/08/2017 11:31: The are three protected stairways, one for each block that lead to a final exit at ground floor level and podium level exits. The podium itself has 3 exits and the basement car park has 4 exits. There is fire safety signage and emergency escape lighting is present below ground level. There is adequate borrowed lighting in most areas of the staircase. These routes were found clear of waste and rubbish. There are lobby door on the ground floor that have mag-lock hold open devices, linked to the fire alarm system. Basement Car Park - Of the four exits, only one was available at the time of the audit. The exit by parking spaces 23+29 was padlocked shut. By space 111, this exit had a key fob but the was no emergency door release. The space by 110 this was signed as a fire exit by is a shared exit with the office next door and had a notice on saying "do not use" and the door in the lobby was locked with a key fob. It was confirmed by CBRE that this route is available and the locked door will open on actuation of their fire alarm. The fire exit door of the West block had a sign "do not use" on it. Instead of using this exit the route brought people back into the building and through the main entrance as a means of escape. It was found that, because of previous works outside this exit, it had been blocked off. These

	works have since finished and yet this door has not been reinstalled as an exit. On the podium level there are three exits. However, there are no fire exit signs and there locations are not clear when entering the podium. The is also no emergency escape lighting on this level, although the property manager informed that there is lighting in that area that comes on automatically when dark. One of the exits on this podium is again part of the adjoining office block and was locked from the inside although this was signed as a fire exit. All fire exit signage from the protected stairways leads onto the podium level rather than down to the final exits at the foot of the stairs. Some of the signage is confused and doesn't led to the nearest of most direct final exit. This is probably due to the area below podium level of the South and East block being complicated in its layout to the final exits to Upper Ground. There are a number of doors that lead onto the stairway from the lift/flat lobbies area that are in poorly maintained state.

Article 8 - General Fire Precautions

SAFETY CRITICAL **Are employers carrying out their general fire precaution responsibilities?**	*"The responsible person must - Take such general precautions as will ensure, so far as is reasonably practicable, the safety of any of his employees or relevant persons"* *(see Article 4, meaning of general fire precautions)*
Compliance Level:Broadly Compliant	Observations: 03/07/2018 12:36: The consultant from IFC Group and the fire risk assessment have confirmed that all fire stopping remedial works have been completed using an IFC Group approved PFC Corofil Acoustic Intumescent Sealant (certificate number: FS453/05). A product information and data sheet was provided from the product that shows PFC Corofil are registered to ISO 9001 quality management. All significant findings as per the Enforcement Notices have all been implemented, including, electrical hazard signage to intake cupboards, removal of combustible items storage in communal areas and service risers and fire door maintenance. 14/08/2017 14:30: There was numerous fire stopping issues and breaches within the riser cupboards, especially the electrical services risers in all blocks. A number of the significant findings from the fire risk assessment action plan have not been implements within the timescales suggested.

Article 13 - Fire Warning Arrangements

SAFETY CRITICAL **Are effective fire warning arrangements provided?**	*"Where necessary.the responsible person must ensure that the premises are equipped with appropriate fire detection equipment, alarms, and fire-fighting equipment"*

Compliance Level:Broadly Compliant	Observations: 14/08/2017 10:49: There is a battery smoke alarm in the lobby area on the 8th floor of the west block that provides access to the roof plant room areas. 14/08/2017 10:42: The is ar AFA with AFD system installed within the ground floor and basement car parks, the ground floor areas houses the concierge desk, the staff areas and the property managers office. The control indicating equipment is located outside the property managers office and has a zone map attached. This zone map was not readily available at the time of the audit and the property manager was advised to display it above the fire alarm panel so it was easily accessible in case of a fire emergency (or to carry out the seek and search procedures). There are manual call points located on the storey exits of the ground floor and the basement car park.

Article 13 - Fire Fighting Equipment

Are effective fire fighting equipment arrangements provided?	*"Where necessary.the responsible person must ensure that the premises are equipped with appropriate..fire-fighting equipment"*
Compliance Level:Broadly Compliant	Observations: 14/08/2017 11:55: Foam portable fire fighting equipment is sited in the main entrance adjacent to the concierge desk. There is 2 x foam and 2 x C02 extinguishers sited within the basement car park area. There is a wet pipe sprinkler systems that covers the basement car park and partial ground floor area.

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

SAFETY CRITICAL Are there adequate procedures for serious and imminent danger and for danger areas?	*"The responsible person must establish & where necessary give effect to, procedures, to be followed in the event of serious & imminent danger to relevant persons, nominate competent persons to implement procedures, inform & instruct relevant persons concerned"*
Compliance Level:Broadly Compliant	Observations: 14/08/2017 10:53: There is a stay put policy in place for the block of flats and action notices have been installed within the blocks. However, some of these notices are not been filled in. The property manager was advised to fill in the notices that have not been completed.

Overall Safety Standard

Broadly Compliant

Observations:

Management Compliance Level

Management Compliance Level: 1 - Well above average

Initial Expectation: Verbal Action Considered EMM

Confirmed Action: Verbal Action

Audit Conclusion: 03/07/2018 15:20

Carried out an FS03 Enforcement Notice follow up 5th June 2018 to check compliance with the schedule. Carried out the inspection with [redacted] of IFC Group and [redacted] the Property Services Manager for Reenie Court and checked all previous deficiencies that formed the schedule have been actioned and completed to adequate standards. The majority of items have been addressed with report sheets and confirmations available from IFC Group and the current fire risk assessment for all the remedial works that have taken place. These works have been completed to an adequate standard and the premises is now broadly compliant with the requirements of the Regulatory Reform (Fire Safety) Order 2005.

In addition to the remedial works from the Enforcement Notice, it was also noted during the follow up that the RP had installed bespoke fire action and procedures for Rennie Court. These are really clear and detail actions specific for Rennie Court. These have been installed throughout the communal areas of the block.

During the audit I sampled the rising and service cupboards in the South Tower on the first and second floor, the North Tower on the First Floor and the West Tower on the 9th and 11th Floors. All compartmentation breeches in these risers had been adequately fire stopped. IFC Group confirmed they had checked all risers and had found no issues. A number of fire doors in all three towers were checked and again no issues were found in regard to self-closing devices, loose glazing and damaged doors. Due to the age of the doors and the lack of intumescent strips and smoke seals (the current doors are Type 2 as defined in CP3), it was advised that any refurbishment works going forward should consider the replacement of these doors with FD30S doors. The shared fire exits from the podium level and basement car park were checked, with no issues identified. CBRE from the adjoining Southbank office have confirmed to RP of Rennie Court that the shared fire exit fails safe on actuation of their fire alarm. The Rennie Court RP has requested the installation of a manual emergency override switch. I was shown the e-mail chain for this discussion.

Please note the number of post audit hours claimed is so high as it also includes, all correspondents between myself and the Property Services Manager as well as their appointed Fire Safety Consultants IFC Group in regards to the Enforcement Notice and the subsequent remedial works during the whole Enforcement process. It also includes the time taken for the administration required for the Enforcement Notice extension that was request by the Responsible Person and subsequently granted. This extension required detailed discussions with CREG due to the requested extension time of 6 months. The reasoning behind the extension was to was due to the issues regarding the smoke control, as the works required are quite extensive. The premises themselves are a block of flats with a complex layout consisting of three towers connected via a ground floor, designed to CP3 Chapter IV Part 1:1971 and used a smoke dispersal system. This system, on the advice of a fire safety expert in approximately 2006/7 was boarded up due to energy efficiency concerns and due to the permanently open vent design. As this decision was taken on good

faith at the time, there was some confusion within the management company as to why this was an issue and included on the Enforcement Notice. As this type of smoke control system has proven not to be very effective and is no longer be acceptable by todays standards, an engineered approach to reinstalling smoke control was deemed necessary by the RP to meet the smoke control and energy efficiency needs. An on-site meeting at the premises took place 19th December 2017 with myself and IFC Group to agree the fire engineered approach to solving the smoke control issues. This approach was discussed and agreed in principle with FEng.

The agreed solution was;

Lobby vents via plena were retained in their original condition (1.5 m2 natural vent, of which approximately 0.15 m2 is permanent, the rest manually openable).

Lobby vents which pass directly through an external wall - which were originally permanently open, but have been converted to become manually openable - will be converted to provide similar ventilation areas as the vents via plena, i.e. 1.5 m2 natural vent, of which approximately 0.15 m2 will be permanent, the rest manually openable.
03/07/2018 12:37
Initial Expectation: Verbal action

Specific instructions for Admin to action

Admin please prepare and send FS03_04 compliance letter to [redacted],
The Company Secretary, Kings Reach Flats Management Ltd, Reception, 11 Upper Ground, London, SE1 9LP.

Audit Calculation & Signature

Management Compliance Level:	1 - Well above average
Property Risk Group:	B - Sleeping familiar or Licensed Premises
Life Risk:	1
Relative Risk:	5.03
Signature of Occupier:	
Date Completed	

Fire Safety Regulation, South East 4 Team
169 Union Street London SE1 0LL
T 020 8555 1200[redacted]
Minicom 020 7960 3629
london-fire.gov.uk

The Company Secretary
Kings Reach Flats Management Ltd
Kings Reach Flats
11 Upper Ground
London
SE1 9LP

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

Date 13 July 2018
Our Ref 91/005051/[redacted]

[redacted]

Dear Sir/Madam

REGULATORY REFORM (FIRE SAFETY) ORDER 2005

Premises: Rennie Court, 11 Upper Ground, London SE1 9LP

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

Further to the recent inspection by an authorised officer I confirm that the works specified in the Enforcement Notice dated **17 August 2017**, 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]