

Fire Safety Guidance Note: Consultation process with London Fire Brigade (LFB)

GN83

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Contents:

1	Introduction	2
2	Section 1 - General process.....	2
	Submitting a Building Regulations consultation.....	2
	Email correspondence -.....	3
	Timescale for a response -	3
	Response format -.....	3
3	Section two – Consultation submission checklist.....	3
4	Section three – Pre-consultation meetings	4
5	Section Four - Contacts.....	5
	Appendix 1 – Consultation pro-forma document.....	6

This Guidance Note provides fire safety advice in respect of building consultations made under Building Regulations.

This Note is one of a series produced by the Fire Authority to provide advice on various aspects of fire safety. If you require any further guidance on the advice given or require advice on another topic please visit your local Fire Safety Office, telephone 020 8555 1200 and ask for the nearest Fire Safety Office, or visit the London Fire Brigade web site at <http://www.london-fire.gov.uk>

1 Introduction

- 1.1 This guidance has been written specifically with aim of improving the statutory consultation process with London Fire Brigade specifically for consultations received in relation to the Building Regulations 2010. It forms part of our drive to improve the quality of our service.

2 Section 1 - General process

Submitting a Building Regulations consultation

- 2.1 All consultations should be sent in hard copy to the following address:

Fire Safety Regulation
London Fire Brigade
169 Union Street
London SE1 0LL

- 2.2 Each consultation package should be accompanied with a letter clearly detailing the Legislation under which we are being consulted;
- Building Act 1984 – Section 15
 - The Building (Approved Inspectors etc.) Regulations 2010 – Regulation 12
 - Regulatory Reform (Fire Safety) Order 2005 Article 45
 - Regulatory Reform (Fire Safety) Order 2005 Article 46
- 2.3 The letter should also provide full address details (including postcode) of the premises being consulted upon and we request that each letter covers one premises and not multiple addresses. Where multiple consultations are being sent in one postal package these should be clearly separated from each other by, for example, an elastic band and have the consultation letter attached.
- 2.4 The consultation should be accompanied by the Building Control Alliance (BCA) pro-forma consultation document populated with the relevant information. Note: a copy of the pro-forma is attached in Appendix 1 of this guidance.
- 2.5 Where further information is submitted on an existing consultation the same process should be followed and hard copies are still expected to be sent addressed as above and include the LFB reference number from the previous LFB consultation response where available.

NOTE: correspondence should be provided via a building control body (BCB - Local Authority or Approved Inspector) and not provided directly from a third party.

Email correspondence -

- 2.6 At present the only correspondence that will be accepted via email are initial notices, pre-completion notices and final certificates but we ask that these are clearly identified in the subject header of the email and include LFB reference number (where available) as this will assist our administrative process. The email address for these types of correspondence is FSR-AdminSupport@london-fire.gov.uk
- 2.7 All other correspondence should be sent in hard copy to the above address. This ensures that it is logged on our workload systems and allocated to an available fire safety inspecting officer.

Timescale for a response -

- 2.8 As per 'Building Regulations and Fire Safety Procedural Guidance' we aim to complete a written response within 15 working days. Where this is not possible (which is normally due to the complexity of the consultation) a letter will be sent confirming the likely delay to the consultation.

Response format -

- 2.9 Our response will include comments made in respect of the following areas;
- Matters considered under the Building Regulations
 - Matters relating to fire precautions that will be necessary to meet their duties under the Regulatory Reform (Fire Safety) Order 2005 once the building is in use.
 - Matters which have to be complied with to meet other Legislation other than Building Regulations
 - Matters which are advisory and not enforceable under Legislation

3 Section two – Consultation submission checklist

- 3.1 In order to assist in making the Building Regulations consultation process as efficient and effective as possible, formal submissions made to the LFB should consist of the following:
- 3.2 For consultations relating to simple (code compliant) works, it would be expected as a minimum that these documents/ items are provided by the building control body in one collated submission to the Authority:
- A copy of the formal building control body consultation letter and completed Building Control Alliance consultation pro-forma document. This should provide commentary from the building control body confirming their assessment of the proposed scheme, and if conditional approval is to be provided, confirmation of what fire safety conditions the building control body is proposing to apply. **Consultations should not be sent where the building control body are not satisfied with the proposals.**
 - A legible set of scaled current plans relating to the proposed building works, that clearly show the fire safety arrangements being implemented. These plans should ideally be no smaller than A3 size. Elevations and site plans showing brigade access will be required for consideration of B5 access proposals.
 - Whether on plan or in writing, confirmation of the passive and active fire precautions being provided in order to demonstrate compliance with the functional fire safety requirements of the Building Regulations.
- 3.3 For complex submissions or where fire engineered solutions are being applied there will be an internal referral to LFB Fire Engineering Group. It would be expected that the following materials are provided in the same collated submission:
- A copy of the formal building control body consultation letter and completed Building Control Alliance consultation pro-forma document. This should provide commentary from the building control body confirming their assessment of the proposed scheme, and if conditional approval is

to be provided, confirmation of what fire safety conditions the building control body is proposing to apply. **Consultations should not be sent where the building control body are not satisfied with the proposals.**

- A legible set of scaled current plans relating to the proposed building works, that clearly show the fire safety arrangements being implemented. These plans should ideally be no smaller than A3 size. Elevations and site plans showing brigade access will be required for consideration of B5 access proposals.
- Whether on plan or in writing, confirmation of the passive and active fire precautions being provided in order to demonstrate compliance with the functional fire safety requirements of the Building Regulations.
- Additional commentary from the relevant building control body confirming their assessment of any fire engineered solutions being applied.
- A copy of any fire strategy document and/ or technical notes being used to justify the proposed scheme.
- Where computer modelling (for example, CFD analysis, evacuation modelling, structural fire engineering) is being relied upon as part of the proposed design scheme, then the supporting modelling report should be provided. If the computer models have been completed using Fire Dynamics Simulator (FDS), Pyrosim, or Smartfire software then the relevant input/output computer files should be supplied on a suitable portable media device (CD/DVD, USB, HDD) to this Authority for review.
- Modelling data should be provided along with evidence that the building control body (or their third party reviewer's) have assessed and agreed the analysis. We would request this information as part of the consultation package so that it can be considered as part of our review.
- Where complex active fire safety systems, e.g.: mechanical smoke ventilation, are being proposed, design and equipment specification details should be provided, demonstrating how they are fit for purpose in the context of the specific project in question.

3.4 By providing the above items where appropriate, LFB will be much better placed to efficiently review and process formal Building Regulations consultations received. We will continue to develop other initiatives internally to help improve response letter times, and will continue to keep all building control bodies informed of any further changes via our regular engagement with ACAI and LDSA fire committees.

4 Section three – Pre-consultation meetings

4.1 For certain projects early consultation with LFB during the design development stage, particularly in relation to non-standard design approaches to fire service access arrangements or complex fire engineered solutions, is considered beneficial to all stakeholders on a project (including ourselves). Therefore we will consider attending such meetings where possible/ appropriate dependent on available resources.

4.2 Any requests for pre-consultation meetings should be forwarded to the local fire safety team leader for their consideration and should be received via the appointed building control body (BCB). This includes consultations where LFB fire engineering group may be involved as the local team retain the overall lead on these projects. The local fire safety team will contact fire engineering group if their involvement is needed. Requests should be sent to the local fire safety team leader at least 4 weeks in advance of any proposed meeting date (albeit it should be noted that this does not guarantee attendance of LFB for that particular date; alternatives will be offered if we cannot attend).

NOTE: It is our expectation that the appointed BCB will also attend any meeting and it is unlikely that we will be able to fulfil a meeting request where a BCB has not been appointed on the scheme.

4.3 In order for pre-consultation meetings to be constructive for all parties involved, we please request that the following information is provided when approaching LFB in order for requests to be dealt with efficiently:

- Confirmation that the project in question does indeed contain aspects of complex fire service access arrangements and/or complex fire engineering and what these are specifically.
- Confirmation of what documents/ materials will be circulated pre-meeting, and how these will be made available. Dependent on the complexity of the issue, a reasonable review period of any materials sent prior to any meeting may need to be agreed between parties.
- Confirmation of the proposed meeting agenda should be confirmed well in advance of the meeting date, it should also be confirmed that formal meeting minutes will be taken by the BCB or a nominated member of the design team and circulated post-meeting for agreement by all parties. Please note that we may not be able to discuss items that have not been included on the agenda so please be specific about what items you would like to discuss.
- The agreed formal meeting minutes should ideally form part of the strategy document or be included in the consultation package provided at formal consultation stage so that any earlier agreements are documented and can be considered as part of the review process.

4.4 Once a meeting is agreed upon then it will be the responsibility of the requesting party to send an outlook diary appointment with the following information;

- Date, time and location of the meeting (LFB may be able to host at their headquarters or a local office by agreement)
- Proposed attendees

4.5 Depending upon available resources, we may not be able to fulfil multiple meeting requests on the same project, thus we advise that meeting requests are submitted to LFB only when the project design team and building control body are in a position to discuss all of the relevant fire engineering issues at one meeting (rather than a piecemeal approach).

4.6 An alternative approach is to request a involvement in a formal Qualitative Design Review (QDR) in line with PD7974-1 which generally relates to more complex or larger scale projects. The process for requesting LFB involvement in a QDR should follow the guidelines above but in addition we would request details on the estimated frequency and length of the meetings and we will then discuss the detailed arrangements.

4.7 Please note that LFB may charge for pre consultation discussions on a cost recovery basis and information on how charges will be applied will be provided when arranging the meeting.

4.8 Information about who will be invoiced should be provided at the time of arranging the meeting. This should include contact details and any unique reference number etc. Invoices should be paid within 28 days.

5 Section Four - Contacts

5.1 Each area in London has a team responsible for enforcing the fire safety legislation (Regulatory Reform (Fire Safety) Order 2005).

5.2 We divide London into four areas covered by a number of Fire Safety Inspecting Officers. An Area Fire Safety manager is responsible for each area, supported by Fire Safety Team Leaders and a central team of administrative staff.

5.3 There are specialist teams responsible for enforcing petroleum legislation and dealing with sub-surface railway/transport premises.

5.4 If you have any queries about the progress of a consultation, the implementation of the Order or are concerned about a fire risk then please call 020 8555 1200 X89171.

Appendix 1 – Consultation pro-forma document

FIRE OFFICER CONSULTATION

Project Ref

Description

Location

Approved Inspector

Fire Authority

Applicant

Agent

1.0 Project Details	
Type of Consultation	Preliminary Design Stage Advice <input type="checkbox"/> Statutory Consultation <input type="checkbox"/>
Site Address	
Scope of Works	
Project Reference	

2.0 Project Information	
Type of Building Work	New Building <input type="checkbox"/> Extension <input type="checkbox"/> Material Alteration <input type="checkbox"/> Change of Use <input type="checkbox"/>
Purpose Group – (please state all)	
Approx. Floor Area (m ²) (diagram C3)	Height to Top Floor (m) (diagram C6)
Number of Storeys (diagram C5)	Number of Basement Storeys (diagram C5)
Fire resistance of elements of structure	
Complexity of Scheme	Simple (code compliant) <input type="checkbox"/> Complex (engineered solutions) <input type="checkbox"/>
Type of Construction	Timber Framed <input type="checkbox"/> Concrete / Steel / Brick <input type="checkbox"/> Prefabricated <input type="checkbox"/> Other <input type="checkbox"/> (Please specify)

3.0 Fire Suppression, Smoke Control, Fire Detection	
Is a Fire Suppression Installation Proposed?	Yes <input type="checkbox"/> No <input type="checkbox"/>
Type of Installation	Sprinkler <input type="checkbox"/> Watermist <input type="checkbox"/> Gas <input type="checkbox"/> Other (detail below) <input type="checkbox"/>
Details of 'Other' Fire Suppression System (where applicable)	
Automatic Fire Detection?	Yes <input type="checkbox"/> No <input type="checkbox"/>
Details of smoke control provision (Please specify)	
Are any of the above 'Compensatory' or 'Trade-Off' features? Please provide further comments in Section 6.0	Yes <input type="checkbox"/> No <input type="checkbox"/>

4.0 Access and Facilities for Fire-Fighting	
Are facilities in accordance with Regulation B5? <i>If no please provide further comments in Section 6.0</i>	Yes <input type="checkbox"/> No <input type="checkbox"/>

5.0 Building Control Bodies Assessment	
Documents used in the assessment	AD B <input type="checkbox"/> BS9991 <input type="checkbox"/> BS9999 <input type="checkbox"/> BS7974 <input type="checkbox"/> BB100 <input type="checkbox"/> HTM <input type="checkbox"/> Other <input type="checkbox"/>
Do the works comply with guidance in Approved Document B or British Standards (prescriptive solutions)	Yes <input type="checkbox"/> No <input type="checkbox"/>
Has a performance based (fire engineered) solution been adopted	Yes <input type="checkbox"/> No <input type="checkbox"/>
Has a quantitative analysis (e.g. CFD Modelling, structural fire engineering) enclosed with this consultation already been reviewed?	Yes <input type="checkbox"/> No <input type="checkbox"/>
If 'Yes', Please provide reviewer's comments of the quantitative analysis, together with any other comments.	

6.0 Comments from the Building Control Body	
The BCB confirms that the details submitted have been reviewed in accordance with the Building Regulations and can confirm that:	
<input type="checkbox"/>	The submission is considered satisfactory
<input type="checkbox"/>	The submission is considered satisfactory subject to additional information as noted below:

Additional details requested:

Building Control Comments

No.	Item
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7.0 List of Supplied Information incl drawing schedule

Drawing Schedule

Title	Reference	Version
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8.0 List of Additional Information to Follow (e.g. CFD modelling discs, third party review, additional drawings)