

**Apparent Breaches of London Plan Policies on Fire Safety and Security on  
3 MAJOR DEVELOPMENTS in ROYAL BOROUGH OF KINGSTON UPON THAMES**

|   |  |   |   |
|---|--|---|---|
|   | <b>Cambridge Road Estate</b><br>Full permission for demolition and building of 9 high rise towers and 3 other buildings; outline permission for rest of <b>2100 unit development</b> , mainly for private sale   | <b>Canbury Place Car Park</b><br>23 storey tower and other buildings in a small “island” between roads on the edge of Kingston Town in Canbury Ward   | <b>Regent’s Wing – Kingston Hospital – demolition of Victorian heritage building and rebuild old people’s housing with care near Norbiton station</b>   |
| <b><u>Officer recommendation</u></b>  | <b><u>APPROVAL</u></b>   | <b><u>NOT YET ANNOUNCED</u></b>   | <b><u>APPROVAL</u></b>  |
| <b>Policy D12 A: Highest standards of fire safety</b><br><br><b>London Plan Policy D12 A</b> states that ALL development proposals MUST achieve the highest standards of fire safety and “ensure” that they do six essential things, including <i>providing sufficient unobstructed outside space for fire appliances to be positioned on and for use as an evacuation assembly point</i> | <b>Policy D12 A 1 (b):</b> The Fire Statement does not include any information that provides assurance that the developer has identified “ <i>suitably positioned unobstructed outside space appropriate for use as an evacuation fire point</i> ”.  | Possible breach of London Plan policies <b>D12 A1 a. and b.</b> due to lack of regard to requirement for the “ <i>identification of suitably positioned unobstructed outside space</i> ” for fire appliances and particularly, and of great concern, as an <i>evacuation assembly point</i> (A1b and 3.12.4). | Possible breach of London Plan policies <b>D12 A1 a. and b.</b> regarding the requirement for the “ <i>identification of suitably positioned unobstructed outside space</i> ” for fire appliances and particularly, and of great concern, as an <i>evacuation assembly point</i> (A1b and 3.12.4).<br><br>NONE of these is assured in the current planning application which completely IGNORES Part A of Policy D12. Planning officers have therefore failed to inform decision makers of a key policy which this development Possible Breaches.<br><br>The Possible Breach is extremely serious given that this development is for elderly people who will be slow to escape in the event of a fire |
| <b>Policy D12 B – Fire Statements</b>   | <b>Possible Breach of D12 A1 a and B5</b><br><br>The Fire Statement shows access to Buildings B, C and E <u>only AFTER the rest of the estate has been built as does the Gateway One Fire Statement</u> . However, Buildings B, C and E are the first buildings to be erected on the site and it seems that access will be needed by the Fire Brigade and emergency services who may not be able to use the routes shown on the diagram while the rest of the estate | Possible breach of <b>London Plan D12 B (4)</b> in that the Fire Statement does not include information on “water supplies and positioning of equipment....any fire suppression and smoke ventilation systems proposed”   | <b>This planning application was recommended for APPROVAL with NO Fire Statement</b><br><br>London Plan <b>policy D12B</b> states that a Fire Statement “should” be submitted with all major development proposals. Given the size of this proposal, the nature of its occupants and the proximity of existing residential homes and a  |

|  |   |   |  |
|--|---|---|--|
|  | <p>is being demolished and rebuilt (and for which outline permission is currently sought)</p> <p>Lack of consideration in the Fire Statement of the safety from fire of people continuing to live on the Cambridge Road Estate during the multiple year predicted demolition and construction period for the Buildings, comprising seven high-rise towers 9-12 storeys and 3 smaller buildings</p> <p>According to the diagram showing <b>fire access</b>, the Fire Statement <i>only covers those residents who live in the Buildings once the whole estate fully operational</i> ie when the development for which only outline permission is currently being sought has also been built.</p> <p>Strategies and action plans that confirm necessary access by fire engines and space for fire appliances to be positioned on for:</p> <ul style="list-style-type: none"> <li>i. residents remaining on the estate during the demolition and construction phases of the Buildings and</li> <li>ii. living in the Buildings when the demolition and development of the rest of the estate takes place appear to have been completely overlooked</li> </ul> <p><i>It is particularly worrying that the Fire Statement only considers fire safety at the time when the whole development is fully operational</i> and does not consider at all the impact of the demolition and construction process <i>over a predicted 12 years</i> on residents who will remain or be living on the estate at various times during that period</p> |   | <p>hospital to the site, it cannot be justified that such as statement should be omitted.</p> <p>The statement ensures that key issues such as the fabric of the development, construction methods, means of escape, fire reducing features, access for service personnel and equipment, access for fire appliances and future modifications to the building will be dealt with during the planning process. There will be no certainty as to whether this policy will be met if the Fire Statement is left as a vague condition of planning approval.</p> |
| <p><b>Policy D12 3.12.4 – evacuation assembly points</b></p> | <p>Lack of provision of evacuation assembly points is in breach of this policy requirement and point 3.12.4 of Policy D12 which states that “<i>Applicants should also show on a site plan appropriate evacuation assembly points</i>” (London Plan highlighting)</p> <p>It is critical - given the scale of the development and the phasing of demolition and construction involved- that existing and new residents know at all times that suitable</p>   | <p>Lack of provision of evacuation assembly points is in breach of this policy requirement and point 3.12.4 of Policy D12 which states that “<i>Applicants should also show on a site plan appropriate evacuation assembly points</i>” (London Plan highlighting)</p> <p>It is critical - given the scale of the development and the phasing of</p> | <p>Lack of provision of evacuation assembly points is in breach of this policy requirement and point 3.12.4 of Policy D12 which states that “<i>Applicants should also show on a site plan appropriate evacuation assembly points</i>” (London Plan highlighting)</p> <p>It is critical - given the scale of the development and the phasing of demolition and construction involved-</p>  |

|   |  |  |   |
|---|--|--|---|
|   | outside space will be available for them to assemble upon safely in the event of a fire.   | demolition and construction involved- that existing and new residents know at all times that suitable outside space will be available for them to assemble upon safely in the event of a fire  | that existing and new residents know at all times that suitable outside space will be available for them to assemble upon safely in the event of a fire   |
| <b>Policy requirement 3.12.10</b> states that <i>“Fire safety and security measures should be considered in conjunction with one another, in particular to avoid potential conflicts between security measures and means of escape or access of the fire and rescue service. Early consultation between the London Fire Brigade and the Metropolitan Police Service can successfully resolve any such issues”</i> | This appears to have been breached as there is no evidence that the London Fire Brigade and Metropolitan Police Service (the “Met Police”) has been consulted on the co-ordination of fire, rescue and security measures for this development.   | There is no evidence that fire safety and security measures have been considered “in conjunction with one another” as required in 3.12.10.   | There is no evidence that fire safety and security measures have been considered “in conjunction with one another” as required in 3.12.10.  |
| <b>Policy D11 3.11.2 and 3.11.4 – Consultation with London Fire Commissioner and Met Police</b>   | There is no evidence that The London Fire Commissioner has been consulted either on the design of the Cambridge Road Estate as required in D11 3.11.2 or on the implications of the phased demolition and construction process for fire safety or that the Met Police has been consulted on security and crime measures as required in D11 3.11.4.<br><br>The Gateway One Fire Statement that accompanies the planning application states that “Consultation with the approving authorities has NOT been undertaken for Building C | There is no evidence that the London Fire Commissioner was consulted early in the design process for this proposed development.<br>No evidence that Met Police consulted as required in 3.11.4 | There is no evidence that The London Fire Commissioner was consulted early in the design process for this proposed development.<br>No evidence that the Met Police has been consulted on security and crime measures as required in D11 3.11.2. and 3.11.4. |
| <b>The Met Police has already commented – in their statutory response to the first Regulation 18 consultation on Kingston Council’s new Local Plan<sup>1</sup> – on their concerns for the safety of residents who are being housed in major new developments without any physical police presence in the form of District Ward Offices that provide a 24/7 base of operation in a local area for the police</b>  |  |  |   |

<sup>1</sup> Met Police response available through this link: <https://www.shahscott.com/post/are-we-safe-in-kingston>