



FIRE STRATEGY REPORT

St Clements House
Hallam Street
West Bromwich
B71 4HB
Date: 31/03/2025

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This strategy has been prepared for Sandwell Council by Firntec Building Compliance

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Executive Summary

This fire strategy has been completed taking into consideration the age of the building and the fact it was built to the standard of the day. It finds that good top-down support is provided by Sandwell Council and that the Principle Accountable Person has ensured that a suitable management team is in place. St Clements House operates with a stay put evacuation strategy for residents to remain in their individual dwellings until instructed otherwise by the Fire Service, or if the origin of fire is in a flat, with occupants then instructed to evacuate the building. Taking into account the use and occupancy of the premises, this would be deemed a suitable and sufficient evacuation strategy for the building. Sandwell Council have considered relevant aspects of fire safety in order to maintain legal compliance and the protection of life. As seen in the table below, there are recommended actions to be undertaken that should be addressed.

The author of this strategy (Ryan Curtis) is a full member of the Institute of Fire Engineers and the Institute of Fire Safety Managers. This would mean that thorough checks have been completed to ensure qualifications and experience are of a level that membership can be given. To maintain membership requires evidence of ongoing Continuous Personal Development (CPD).

Recommended actions

Design item	Recommendations	Reference
External wall survey, Fire Risk Appraisal External Walls and a Visual Structural Appraisal	An External Wall Survey, Fire Risk Appraisal External Walls and a Visual Structural Appraisal have been completed for St Clements House. The Principle Accountable Person for the building should ensure that any actions/recommendations arising from the reports are completed.	4.2 and 5.1.1
Firefighting equipment	If fire extinguishers are to be provided, relevant staff should be suitably trained in their use.	6.5.1
Fire risk assessment actions	There is a suitable and sufficient fire risk assessment in place. Any actions arising within this assessment should be undertaken.	7.2.1

1. INTRODUCTION

1.1 Introduction

- 1.1.1. Firntec have been appointed by Sandwell Council to provide a fire safety consultancy review and document the fire safety strategy for the building at St Clements House, with the view of providing comment regarding the level of fire safety currently offered by the design and recommendations relating to mitigate any risks posed.
- 1.1.2. This report documents the retrospective fire safety strategy for this occupied building. It consists of a review of the fire safety provisions in the building to highlight non-compliances and the fire safety strategy proposed to support those provisions. As a retrospective fire safety strategy, it is expected that this document will serve as a key reference document for on-going management of the premises, future fire risk assessments and prospective redevelopments.
- 1.1.3. This strategy will help to identify non-compliances with respect to current regulations as a 'gap analysis'. The gap analysis is useful in order to understand and visualize – to a certain extent – the overall fire risks for the premises.
- 1.1.4. This report is intended to document the strategic design rather than to provide detailed construction and specification information. This report has considered the fire safety recommendations within the 'Purpose built Block of Flats Guide' for this existing building.
- 1.1.5. The fire safety strategy documented herein is issued to building management so that the current standard of fire safety within the building can be estimated more accurately. The gap-analysis provides a summary of the identified deficiencies that are recommended to be addressed and closed out.

1.2 Legislation requirements

- 1.2.1. Fire safety in buildings is governed by various pieces of legislation in the UK. The Building Regulations 2010, Part B, Fire Safety applies to building design, whilst for fire safety management in buildings, compliance with the Regulatory Reform (Fire Safety) Order 2005 (FSO) is required.
- 1.2.2. As an existing building, the on-going use and need for compliance is primarily covered by the FSO. However, as a benchmark standard the strategy has been developed to satisfy the requirements of the Building Regulations 2010 (as amended), namely:
- B1 – Means of warning and escape.
 - B2 – Internal fire spread (linings)
 - B3 – Internal fire spread (structure)
 - B4 – External fire spread.
 - B5 – Access and facilities for the fire and rescue service
- 1.2.3. This retrospective fire safety strategy primarily addresses life safety under the Building Regulations 2010 but can also be used to support the generation of the fire risk assessment for the purposes of compliance with the FSO. This is the duty of the 'Responsible Person' & 'Accountable Person' for the building. Further information regarding the FSO is provided in the fire safety management section of this strategy (Section 7).

- 1.2.4. This report provides sufficient information, which is consistent with the requirements of Regulation 38 and Golden Thread approach, to facilitate the comprehensive and on-going operation of a building from a fire safety perspective by building management. It can be used to aid the 'Responsible Person(s)' & 'Accountable Person(s)' in maintaining the fire risk assessment for the premises, including use by their fire safety management team. In this respect, it may also be used to consult with the local fire and rescue services and inform any prospective reviews or audits of the premises.
- 1.2.5. The overall strategy has not been specifically developed to address property protection. However, the features that are included for life safety, as required by the Building Regulations 2010, are expected to contribute to some extent to business continuity and property protection.
- 1.2.6. As the apartments are in occupation, The HM Guide for Sleeping Accommodation is also used for reference where appropriate.
- 1.2.7. This strategy does not address site fire safety during any future construction / refurbishing works. The Health and Safety Executive (HSE) issues guidance on identifying and managing fire precautions during the works and this should be consulted.

1.3 Design basis and guidance

- 1.3.1. This retrospective fire safety strategy has been developed to satisfy the requirements for fire safety under the Building Regulations 2010. The existing provisions and proposed fire safety strategy have been primarily benchmarked against the recommendations as set within Approved Document B and BS9991 – the code of practice for fire safety in the design, management and use of residential buildings and the codes of practice referenced therein.
- 1.3.2. Retrospective fire strategies are necessary when the original design stage documentation is missing. This documentation typically includes fire safety features, construction materials, compartmentation details, evacuation plans, and other essential fire safety information. Without this information, it becomes challenging to accurately assess the building's fire safety measures and develop effective strategies to mitigate fire risks.
- 1.3.3. The fire safety strategy takes cognisance of the fact that the building is existing and has already been constructed and / or refurbished in various stages over several years, as a result includes aspects which do not comply with contemporary guidance. As recognised within contemporary guidance however, where adherence with prescriptive guidelines is not practicable, fire engineering principles incorporating risk-based assessment may be adopted to substantiate performance-based design solutions that meet the functional requirements of the Building Regulations 2010.
- 1.3.4. Any new installation or refurbishment should be installed according to the current edition of relevant building regulations and published guidance.

2. PROJECT OVERVIEW AND DESIGN BASIS

2.1 Building Description & Historical Context

- 2.1.1 St Clements House is an accommodation building for general needs occupation comprising of 36 self-contained flats. The building was constructed in 1962 and is built to the standard of the day. The Fire Risk Assessment (FRA) provided states that the building is of concrete construction: block work to 1st floor level and a mixture of clay tiles with Rockwool insulation and insulated render system above 1st floor. The last refurbishment was in 2007/08.
- 2.1.2 St Clements House has been registered with the Building Safety Regulator as having 10 floors above ground level. The premises consists of floors: ground and 1-9. Each floor has x4 flats, except the 9th floor which is the community room. Access to the roof is possible via a trap door adjacent to the 9th floor community room. The building height has been registered with the Building Regulator as 27m; therefore, the premises is in scope of the Building Safety Act. There are x2 final exits, a single passenger lift and x2 protected staircases. CCTV is present to both the interior and exterior of the building.



Levels



9th floor community room

- 2.1.3 Firntec have also carried out a Visual Structural Appraisal (dated 26/02/25), an External Wall Survey (dated 13/02/25) and a Fire Risk Appraisal of External Walls (FRAEW; dated 16/05/25). The FRAEW gives an overall building risk rating of 'low', with no remedial works suggested. Further information on the external walls is provided in section 5.1 of this report.

2.2 Occupancy

- 2.2.1 The total number of residents is believed to be around 72, assuming that occupancy is an average of 2 per flat. This number does not allow for visitors and contractors that could reasonably total an extra 10 persons on any given day, giving an approximate total of 82 persons in the building.

3. MEANS OF WARNING AND ESCAPE

Building Regulations requirement B1:

"The building shall be designed and constructed so that there are appropriate provisions for the early warning of fire, and appropriate means of escape in case of fire from the building to a place of safety outside the building capable of being safely and effectively used at all material times."

3.1 Evacuation Regime

- 3.1.1 The premise operates with a stay-put evacuation strategy, as denoted within the Fire Action Notices seen on site. Residents are to remain in their individual dwellings until instructed otherwise by the Fire Service. If the origin of fire is in a flat, then occupants are instructed to evacuate the building. A multilingual fire action notice is in place and site information is provided.



Multilingual fire action notice



Building information

3.2 Means of Detection and Alarm

- 3.2.1 The building benefits from an LD1/2 automatic localised fire detection system within the flats, in the form of hardwired or battery-operated smoke detectors. The main common area detection system is linked to the automatic opening vent (AOV system) only. Detection heads are at the top of both protected staircases. There are no manual call points or sounders in common areas of the building. There is a fire alarm repeater panel and flashing beacon on the ground floor which is linked to detection in the 9th floor common room. The bin store has a separate detection system for the deluge system.



Beacon (for community room)



Common area detection

- 3.2.2 The building has an AOV system which is linked to the main common area detection. AOV windows are located within both protected staircases on all floors.



AOV window to staircase

3.3 Means of Escape Overview

- 3.3.1 The general philosophy for means of escape is that persons can turn their back from a fire and use an alternative escape route, or travel distance limitations are to be met and access to a single route and final exit being available without passing through other rooms. Generally, the location of final exit and disposition of the escape routes and exits allow for suitable means of escape from all areas of the building.

3.3.2 St Clements House has x2 protected staircases (front and rear) that lead to the final exits, fresh air and a place of safety. While both staircases are open from floors 1-9, they are closed at the bottom and are therefore sufficiently protected. There are x2 final exits: the main entrance/exit and a rear exit. There is also an exit on the other side of the community room (730mm), which opens to the rear staircase. Once outside to a place of safety, a final place of safety is achievable.



Main entrance/exit



Front staircase



Rear exit



Fire stopped at base of staircase



Open staircase



Community room exit

3.3.3 As the premises is in occupation, the HM guide for sleeping accommodation can be used to ensure the exits support the number of persons evacuating the premises.

The HM guide gives 100 persons for a 750mm exit and 200 for 1050mm, with an additional 15 persons allowed for every 75mm over. The largest exit would have to be discounted due to assumed fire. If the premises has only a single final exit it should be limited to no more than 60 people.

- Main entrance/exit: 900mm **(Discounted)**
 - Rear exit: 760mm, 100 persons
- Total = 100 persons

With a maximum occupancy of 82 people, the exits widths would support a simultaneous evacuation, if this were to be considered. However, this is currently redundant, as the premises operates with a stay put evacuation strategy for residents to remain in their individual dwellings until instructed otherwise by the Fire Service, or if the origin of fire is in a flat, with occupants then instructed to evacuate the building. Both protected staircases measure 1000mm.

- 3.3.4 The HM Guide for, Sleeping Accommodation gives that where people with special needs use or work in the premises, their needs should, so far as practicable be discussed with them. These will often be modest and may require only changes or modifications to existing procedures. Building management may need to develop individual 'personal emergency evacuation plans' (PEEPs) for disabled persons who frequently use a building. They will need to be confident of any plan/PEEP that is put in place after consultation with them.

Management have given that residents are responsible for informing building management if PEEPs are required, and that this information would be stored in the Secure Information Box (SIB). To increase capacity for carrying out PEEP's, training is delivered to the Housing Management Team.

- 3.3.5 ADB v1 Dwellings gives us a maximum travel distance of 7.5m for escape in one direction and 30m for more than one direction of travel, from a flat entrance door to a common stair or stair lobby. The building is built to the standard of the day (1962) and would have been approved at the time of construction. All flats dispersing towards protected stairs/lobby and a relative place of safety. There are no dead-end situations forming a means of escape as the x2 protected staircases create x2 directions of travel. The x2 exits within the community room also give x2 directions of travel there. The current FRA does not highlight any issues with travel distances. This is in-keeping with observations made during the site familiarisation visit.

3.4 Escape Beyond Final Exits

- 3.4.1 A fire assembly point is a pre-determined location where individuals are instructed to gather during an emergency evacuation, primarily in the event of a fire. Its main goal is to provide a clear, organised, and safe location for all building occupants to assemble and be accounted for. This is not in place or required as the premises operates with a stay put evacuation strategy for residents to remain in their individual dwellings until instructed otherwise by the Fire Service, or if the origin of fire is in a flat, with occupants then instructed to evacuate the building.

3.5 Fire Doors and Escape Doors

- 3.5.1 The standard of fire doors within the building has been given as nominal & notional FD30s. Intumescent strips and cold smoke seals are present on flat front doors, service/storage cupboard doors and communal doors protecting the staircases. The glass alongside the fire doors to the front staircase is Georgian wired, which is known to be sufficiently fire resisting. The glass alongside the fire doors to the rear staircase has an unknown fire rating but does appear to be tough, thicken glass. A program to ensure that all communal fire doors are checked every 12 weeks is in place. This is undertaken by the Fire Safety Rapid Response Team. Information regarding the use of fire doors has been provided to residents.

3.6 Emergency Escape Lighting / Lightning protection

- 3.6.1 Lightning protection is in place for the building, with maintenance contracts in place for lightning conduction testing in accordance with BS6651.

3.6.2 Emergency escape lighting is installed on escape routes and on final exits to provide temporary illumination in the event of failure of the primary power supplies to the normal lighting system. As part of the emergency lighting system, escape lighting is provided to ensure that escape routes are illuminated at all material times. These were incorporated into the buildings general lighting and in the form of bulkhead directional signage. Monthly checks are carried out by Sandwell Council MBC in house electrical team, or an approved contractor. The emergency lighting covers:

- Change of level
- Final exits
- Places of special hazard (Plant areas)
- Perimeter lighting



Bulkhead directional signage



Emergency lighting

3.7 Fire Safety Signage

3.7.1 Fire safety signs should be installed where necessary to provide clear identification of fire precautions and means of escape in the event of fire. All parts of the building should be fitted with appropriate fire safety signage to comply with The Health and Safety (Signs and Signals) Regulations 1996 i.e., signage to be specified in accordance with BS ISO 3864-1 and following the principles of the Safety Signs and Signals: Guidance on Regulations Publication.

3.7.2 The purpose of fire signs is to direct persons towards fire exits, or to provide specific information or warning about equipment, doors, rooms, or procedures. They should be recognisable, readable, and informative, as they convey essential information to regular and infrequent users of the premises, and the Fire and Rescue Service. Good directional signage was seen throughout the building including above final exits.

- 3.7.3 A single lift is in place for passengers, which has a firefighter control switch available. The lift only goes to the 7th floor. The 8th and 9th floors are accessible either by stairs or the disabled platform lift. The lift motor room is on the 8th floor. Suitable signage was seen in lift lobbies, instructing building users not to use the lift in the event of a fire.



Single passenger lift



Firefighter control switch

- 3.7.4 In line with Smoke Free England regulations (2007), the premises operates a 'no smoking policy in all areas, with 'no smoking' signage seen in common areas. Good compliance with the policy was seen.



No smoking signage

- 3.7.5 In line with Fire Safety England Regulations 2022 and Approved Document B. Wayfinding signage requirements depicting floor level and flat numbers should be sited in stairwells and lobbies. Good wayfinding signage in place for the building, which does conform with current requirements.



Wayfinding

See extract from ADB detailing the necessary requirements below:

Wayfinding signage for the fire service

15.13 To assist the fire service to identify each floor in a block of flats with a top storey more than 11m above ground level (see Diagram D6), floor identification signs and flat indicator signs should be provided.

15.14 The floor identification signs should meet all of the following conditions.

- a. The signs should be located on every landing of a protected stairway and every protected corridor/lobby (or open access balcony) into which a firefighting lift opens.
- b. The text should be in sans serif typeface with a letter height of at least 50mm. The height of the numeral that designates the floor number should be at least 75mm.
- c. The signs should be visible from the top step of a firefighting stair and, where possible, from inside a firefighting lift when the lift car doors open.
- d. The signs should be mounted between 1.7m and 2m above floor level and, as far as practicable, all the signs should be mounted at the same height.
- e. The text should be on a contrasting background, easily legible and readable in low level lighting conditions or when illuminated with a torch.

4. INTERNAL FIRE SPREAD

Building Regulations requirement B2:

- To inhibit the spread of fire within the building, the internal lining shall:
 - Adequately resist the spread of flame over their surfaces; and
 - Have, if ignited, a rate of heat release or a rate of fire growth, which is reasonable in the circumstances.
- In this paragraph 'internal linings' mean the materials or products used in lining any partition, wall, ceiling or other internal structure."

Building Regulations requirement B3:

- The building shall be designed and constructed so that, in the event of fire, its stability will be maintained for a reasonable period.
- A wall common to two or more buildings shall be designed and constructed so that it adequately resists the spread of fire between those buildings.
- Where reasonably necessary to inhibit the spread of fire within the building, measures shall be taken, to an extent appropriate to the size and intended use of the building, comprising either or both of the following:
 - sub-division of the building with fire resisting construction.
 - installation of suitable automatic fire suppression systems.
- The building shall be designed and constructed so that the unseen spread of fire and smoke within concealed spaces in its structure and fabric is inhibited.

4.1 Internal Linings

- 4.1.1 In the early stages of a fire in a building, the choice of material for the lining of walls and ceilings can significantly affect the spread of fire and its rate of growth. Wall and ceiling linings should achieve at the surface spread of flame and fire classifications specified in the table below, as a minimum. This is likely to be the case due to solid walls throughout the communal areas of the building.
- 4.1.2 Parts of the wall area of an individual room are permitted to be of a poorer performance classification than those set out but no worse than European Class D-s3, d2. This variation is limited to an area not exceeding half the floor area of the room, 20 m² in residential / ancillary areas, or 60m² in commercial areas, whichever is less. Minimal amount of additional wall linings were seen on the site familiarisation visit.
- 4.1.3 Where thermoplastic materials which do not comply are used (e.g., windows, roof- lights and lighting diffusers only), these are to comply with the recommendations given in ADB.

Minimum surface spread of flame classification requirements

Location	European Class
Rooms	C-s3, d2
Escape Routes	B-s3, d2
Small rooms ≤30m ²	D-s3, d2
Other commercial rooms	C-s3, d2

4.2 Structural Fire Resistance

- 4.2.1 The building was constructed in 1962 and was built/ approved to the standard of the day. The current FRA confirms that *“the building is designed to provide as a minimum 1-hour vertical fire resistance and 1-hour horizontal fire resistance around flats, stairwells and lift shafts”*.

4.2.2 Compartmentation and Fire-Resisting Construction

- 4.2.3 In accordance with ADB, levels of compartmentation, the following internal lines of compartmentation are required:
- Floors
 - Communal corridors (walls separating residential communal areas)
 - Stair cores – including ancillary areas opening into it
 - Communal lobbies
 - Lift shaft
 - Walls in between each residential flat
 - Wall surrounding refuse store to base of fire escape stair

The FRA advises that the overall standard of compartmentation is sufficient, and states; *“The premise has sufficient compartmentation to limit the travel and effect of smoke and flame in event of a fire. Whilst the existing fire stopping is fit for purpose, there is a cyclical programme to ensure fire stopping as not been compromised by third parties and where applicable enhance the fire stopping.”*

4.2.4 Cavity Barriers and Concealed Spaces

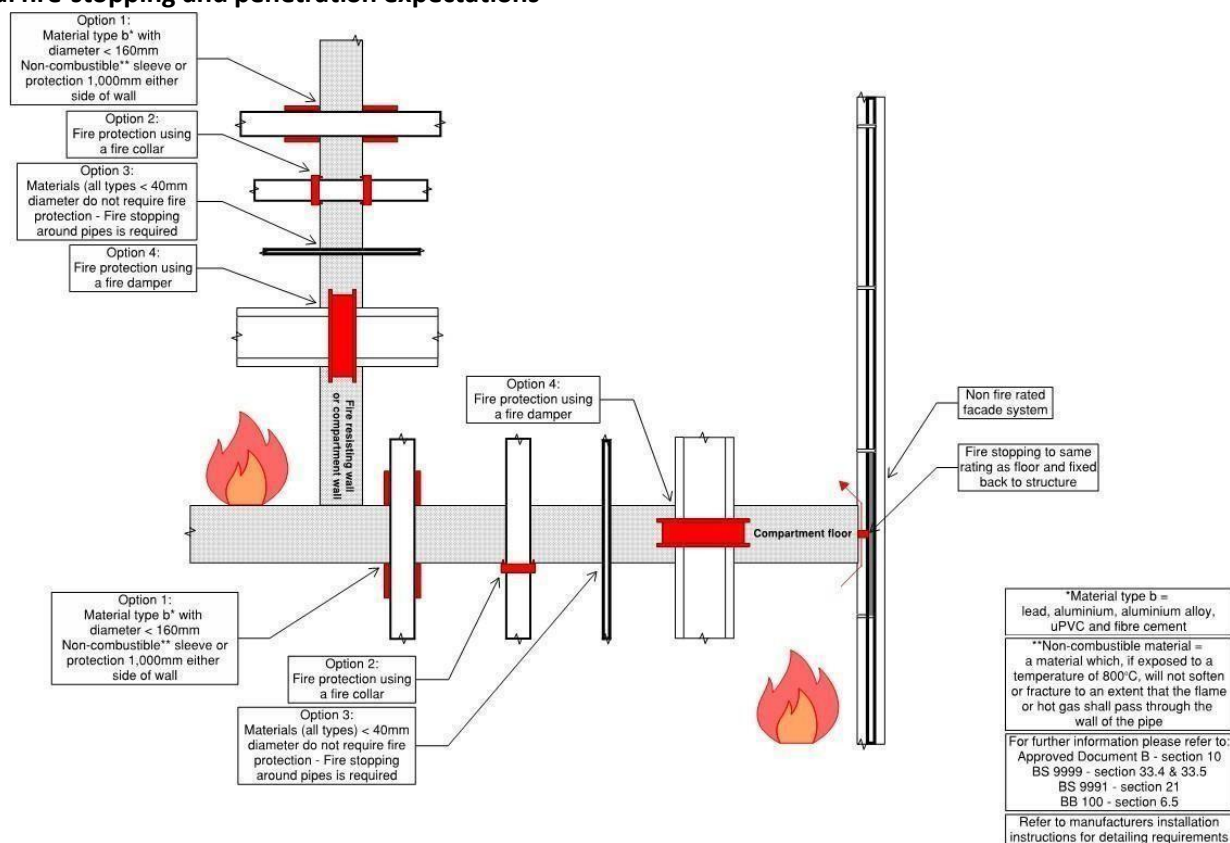
- 4.2.5 The FRAEW states that cavity barriers are present to the external wall. With the material given as ‘solid state mineral wool’ and the window apertures having Stonewool core, aluminium foil faces.

4.3 Fire-Stopping and Penetrations through Fire-Resisting Construction

Minimum periods of fire resistance for fire-separating elements are:

Elements requiring fire-separation	Period of fire resistance / Minutes (*)	Exposure	Fire doors (**)
Compartment walls	60	From each side separately	FD30S
Fire separation to escape routes	60	From each side separately	FD30S
Compartment floors - Upper floors	60	From beneath	N/A
Ancillary rooms	60	Risk side	FD30S

Typical fire-stopping and penetration expectations



5.1 External surfaces of walls

- 5.1.1 Whilst considering the stringent requirements to “relevant buildings” (as amended by the building regulations), building of these heights meet the requirements of 18m or more. The fire performance of the external wall surface is required to be a minimum A2-s1, d0.

As the property is in scope of the Building Safety Act, if newly constructed, St Clements House would be subject to the requirements of the building (Amendment) Regulations 2018, in relation to external walls. However, as the requirements are not necessarily retrospective, guidance must be taken from an external wall survey undertaken by a competent person.

The FRAEW has identified the following x3 wall construction types:

Wall Construction	Build-up
Masonry (KN53ZR)	- External Surface Material (Masonry blockwork) - Insulation (Mineral Wool Insulation) - Inner Leaf (Blockwork)
Aluminium panels (5LWID2)	- External Surface Material (Aluminium Panel) - Framework (Aluminium L/T Rail) - Insulation (Mineral Wool Insulation enclosed in - Cavity - Inner Leaf (Reinforced concrete)
Render (EY7R9V)	- External Surface Material (Sto render) - Outer leaf - Insulation (Mineral Wool Insulation) - Inner Leaf (Blockwork)

The FRAEW gives that an area inspected containing Mesh, were rated E – Highly combustible. All other elements are rated A2 (limited combustibility) or above. It goes on to state that overall, this building represents a Positive PAS9980:2022 outcome and that *“It is our professional opinion that there is no requirement for remediation within this wall type.”*

10.14 Regulation 7(2) applies to any building with a storey at least 18m above ground level (as measured in accordance with Diagram D6 in Appendix D) and which contains one or more dwellings; an institution; or a room for residential purposes. It requires that all materials which become part of an external wall or specified attachment achieve class A2-s1, d0 or class A1 in accordance with BS EN 13501-1, other than those exempted by regulation 7(3).

External surfaces

- 10.5** The external surfaces (i.e. outermost external material) of external walls should comply with the provisions in Table 10.1. The provisions in Table 10.1 apply to each wall individually in relation to its proximity to the relevant boundary.

Table 10.1 Reaction to fire performance of external surface of walls

Building type	Building height	Less than 1000mm from the relevant boundary	1000mm or more from the relevant boundary
'Relevant buildings' as defined in regulation 7(4) (see paragraph 10.14)		Class A2-s1, d0 ⁽¹⁾ or better	Class A2-s1, d0 ⁽¹⁾ or better
All 'residential' purpose groups (purpose groups 1 and 2)	More than 11m	Class A2-s1, d0 ⁽²⁾ or better	Class A2-s1, d0 ⁽²⁾ or better
	11m or less	Class B-s3, d2 ⁽²⁾ or better	No provisions

5.2 Roof coverings

5.2.1 The premise has an original flat concrete roof in place.

The Visual Structural Appraisal states:

"The original roof is a reinforced concrete cast slab with perimeter RC parapet wall allowing safe access. There is an enclosure which partially covers the roof area comprising the lift plant. This structure is formed of solid masonry walls.

There were no tell-tale signs of any significant structural movement noted at the time of our inspection. The exterior walls were noted to be plumb with no signs of significant bowing, bulging or leaning noted to the masonry walls.

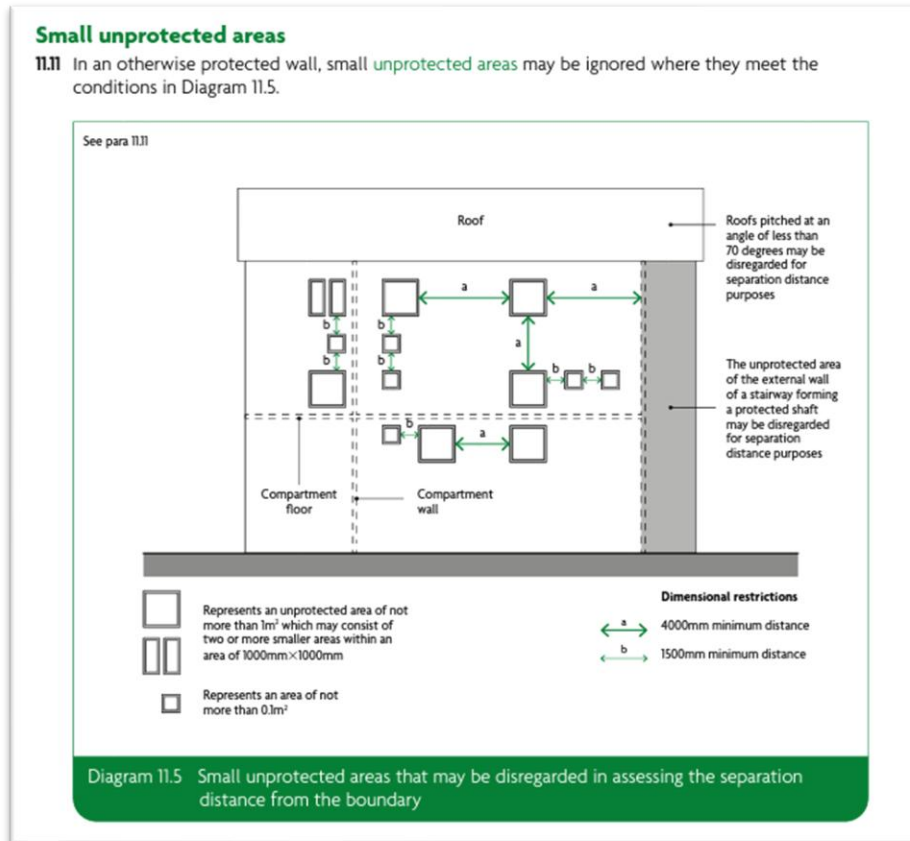
The roof has subsequently been covered with a new waterproofing covering formed of a steel frame installed to the existing roof which supports pitched corrugated sheets. This roof is not insulated and therefore acts purely as a weather barrier. The fire protection of the steel is unclear as the beams do not appear to be unprotected. Details of this frame should be requested from the contractor who completed the works in 2007. No signs of water ingress of that the roof is not performing as intended."

5.2.2 'Roof covering' describes one or more layers of material, but not the roof structure as a whole. ADBv1 gives that the performance of roof coverings of AA, AB or AC are required and that materials are of limited combustibility. In the case of flat roofs, the covering will usually consist of the deck (top supportive layer), vapour control layers, insulation, waterproofing membranes, and any other layers and spaces. It is assumed that the building currently complies with these requirements, however, these should be confirmed on site if confirmation is desired.

Limitations on roof coverings

Distance from relevant boundary	Designation of roof covering		
	AA, AB, or AC	BA, BB, or BC	CA, CB, or CC
Less than 6m	✓	✗	✗
At least 6m	✓	✓	✗
At least 20m	✓	✓	✓

- 5.2.3 The total amount of combustible material on external walls will also be limited in practice by space separation provisions, following details within Section 11 of ADB, including the fact that the premises is an existing building which has historically been approved by external Approved Inspectors and local Fire Service at the time of construction, the number of unprotected openings can be accepted.



6 ACCESS AND FACILITIES FOR THE FIRE AND RESCUE SERVICE

Building Regulations requirement B5:

- The building shall be designed and constructed so as to provide reasonable facilities to assist firefighters in the protection of life.
- Reasonable provision shall be made within the site of the building to enable fire appliances to gain access to the building."

6.1 Means of notifying the fire and rescue service

- 6.1.1 In the event of a fire, tenants of the flat and/or other relevant persons should alert the local Fire and Rescue Service by contacting the emergency services, calling 999 or 112. A Fire Action Notice is in place that highlights this, which is advertised on the ground floor corridor noticeboard.

6.2 Fire appliance access to and around the site

- 6.2.1 As the premises and area is existing, there is no need to retrospectively upgrade the surrounding areas. However, access is available for firefighting appliances.

- 6.2.2 In line with ADB 13.2 as below; the exits/entrance point in the building is over 750mm in width.

13.2 For flats, either of the following provisions should be made.

- a. Provide access for a pumping appliance to within 45m of all points inside each flat of a block, measured along the route of the hose. Every elevation to which vehicle access is provided should have a suitable door(s), not less than 750mm wide, giving access to the interior of the building. Door(s) should be provided such that there is no more than 60m between each door and/or the end of that elevation (e.g. a 150m elevation would need at least two doors).

- 6.2.3 The close location available for fire service vehicles, including the location of the fire hydrant, will allow for sufficient distance/coverage to the premises.

6.3 Firefighting facilities provided within the development

- 6.3.1 Firefighting access for the Fire and Rescue Service to the building would be via Hallam Street or St Clements Lane. The building sits on the corner of both roads. The nearest fire station is West Bromwich Fire Station which is 0.5 miles away.

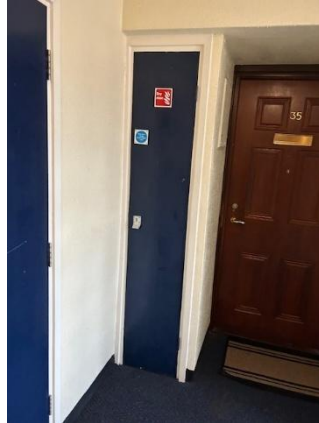


- 6.3.2 The building is not fitted with a sprinkler system in common areas but does have a deluge to the bin room, which is tested 6-monthly. As the requirements in ADB for sprinklers in accommodation over 11 meters are not retrospective, this is acceptable.

- 6.3.3 A dry riser is a system that has an empty pipe running up the inside of a building, with inlet connections on the outside. The system allows Fire and Rescue Services to pump water through the building before connecting hoses to internal outlets of each floor to extinguish fire. The premises has a dry riser system for use by the Fire and Rescue Service in place. The inlet cupboard is on the ground floor. Internal outlets cover floors 1-8. A maintenance contract is in place to service the dry riser system twice yearly.



Dry riser inlet cupboard



Dry riser outlet cupboard

6.4 Water supplies

- 6.4.1 The close location of the main entrance and fire hydrant will allow for sufficient coverage and access to the building with all areas within 90m.

6.5 Firefighting equipment

- 6.5.1 The accepted practice for general needs accommodation is that fire extinguishers do not need to be present in communal areas. St Clements House does have fire extinguishers located in the lift motor room and community room which are serviced annually (every October). It is understood that caretaking staff are not currently trained in the use of fire extinguishers.

7 FIRE SAFETY MANAGEMENT

7.1 Fire Safety Management Documentation

- 7.1.1 Under Regulation 38 of the Building Regulations, this fire safety strategy report should form part of the information handed over to the Principal Accountable Person to enable them to enact fire safety management in the building. A suitable and sufficient Resident Engagement Strategy is in place for the premises.
- 7.1.2 Under the FSO, the Principal Accountable Person is responsible for developing a fire safety plan. To achieve the required level of information dissemination and availability, a fire manual should be produced specific to the site.

- 7.1.3 With the premises over 7 stories, as detailed in the Fire Safety (England) Regulations 2022, a SIB (Secure Information Box) is required. The building has an SIB in place which located in the ground floor front entrance lobby.



SIB

- 7.1.4 The SIB should be maintained and kept up to date to avoid a breach of Article 38 of the Regulatory Reform (Fire Safety) Order 2005. Information within this box could not be confirmed as the unit was secured/locked. This SIB should be regularly updated and include the following:

- a) Positioned at a location in or on the building which is readily accessible to the fire and rescue authority.
- b) Capable of containing the documents required to be placed in it by these Regulations.
- c) Reasonably secure from unauthorised access and vandalism.
- d) The name, address, and telephone number within the United Kingdom of the accountable and responsible person.
- e) The name and contact information of such other persons within the United Kingdom who are provided with the facilities to, and are permitted to, access the building as the responsible person considers appropriate.
- f) Details of any bedridden or persons within the building who have a PEEP
- g) Such documents as are required to be placed in it by these Regulations.

The responsible person must ensure the following: —

- h) The responsible person must provide the local fire and rescue authority with anything required to enable it to access the secure information box and must provide anything additional required as soon as reasonably practicable if there are any changes to those requirements.
- i) The responsible person must inspect the secure information box at least annually and ensure that it continues to meet the necessary requirements.

7.2 Maintenance of fire safety systems

7.2.1 The responsible person(s) and/or accountable person(s) should ensure that all fire safety arrangements being maintained are accounted for as part of their fire risk assessments. There is currently a suitable and sufficient FRA in place for the St Clements House building, dated 10/03/25.

7.3 Management of Fire Safety

7.3.1 The Principal Accountable Person will be responsible for ensuring that fire safety provisions and assumptions for these areas are maintained and enforced. These include (but not limited to):

- Common corridors, lobbies, risk areas such as electrical intake rooms/cupboards and stairs remain suitably fire sterile (no stored combustible goods or obstacles which may hinder escape.)
- Ensuring that fire doors within the common areas may operate effectively and are not propped open.
- Fire safety information and instructions are provided to residents.
- Fire safety information including the use of fire doors and their importance/operations provided to residents.
- Up to date floor plans available.
- Details on all lifts and firefighting equipment
- Wayfinding signage which has since been installed remains up to date and correctly sited.
- Management should ensure that service risers and storage cupboards accessed from common corridors and stairs are locked shut whenever these are not in use.

All of the above are addressed in the fire risk assessment undertaken for St Clements House at regular intervals by a competent person. Any gaps or deficiencies found are addressed in an action plan.

7.3.2 The Fire Safety (England) Regulations 2022 made it a legal requirement from 23 January 2023 for responsible persons of all multi-occupied residential buildings in England with two or more sets of domestic premises (and which have common parts), to provide residents with fire safety instructions. Responsible persons should make sure that these instructions are shared with their residents in a form that residents can reasonably be expected to understand as below.

Responsible persons need to provide residents with instructions on:

- how to report a fire
- a reminder of what the evacuation strategy is for that building
- any other instruction that tells residents what they must do once a fire has occurred, based on the building's evacuation strategy

The principal accountable person, must:

- Prepare a resident engagement strategy
- act in accordance with the strategy
- review and revise the strategy and keep a record of the reviews
- provide the latest version to each accountable person
- when necessary, consult residents, owners of residential units, and accountable persons about the strategy and take their opinions into account.

Accountable persons, for the parts of the building that they are responsible for, must:

- provide the latest version of the strategy to residents and owners of residential units
- tell residents about building safety work
- tell them about who will carry out the work

The above is addressed via suitable Resident Engagement Strategy that is in place. This is advertised to relevant persons via the Sandwell Council website link. Sandwell Council have also appointed Resident Engagement Officers.