Fire Risk Appraisal of the External Walls (FRAEW) Report

For

145 Drury Lane
&
10 Wild Street,
London,
WC2B 5TA & WC2B 4RL

Carried out and prepared for

145 Drury Lane (Management) Limited
145 Drury Lane,
Covent Garden,
London,
WC2B 5TA

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Section 1. Executive Summary

Harris Associates internal project reference	HA\Drury Lane, 145
Project name	145 Drury Lane
Address	145 Drury Lane & 10 Wild Street, London, WC2B 5TA & WC2B 4RL
Building's storey height	20.01 m
Original year of construction	1916
Type of FRAEW assessment that has been carried out	Basic
Number of storeys above ground level	6
Building attachments Private balconies and terraces constructed with non-combustible materials.	Yes
Current evacuation policy	Full Simultaneous Evacuation Policy
Number of staircases across the building	2

1.1 External Wall Types & Fire Risk Rating

The building largely consists of the following external wall types:

Fire Risk Rating for External Wall Type 1(EW-1) – Render Facade	Low
Fire Risk Rating for External Wall Type 2(EW-2) – Masonry Façade Types (Brick, Portland stone, terracotta infills)	Low

The building overall assessment is as follows:

Building Overall External Wall Fire Risk Rating	Low
Is the fire risk to life associated with external walls tolerable?	Yes
Is remediation required in line with the PAS 9980 assessment carried out?	No
Are there any interim measures to be implemented?	No

Section 2. Quality Standards Control

2.1 Quality Standards Control

The signatories below verify that this FRAEW report has been prepared in accordance with our quality control requirements. These procedures do not affect the content and views expressed by the originator.

This document must only be treated as a draft unless it has been signed by the Originator and approved by the Managing Director.

2.2 Disclaimer

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Our liability shall not increase by reason of a shortfall in recovery from any other party, whether that shortfall arises from an agreement between you and them, your difficulty in enforcement, or any other cause

Section 3. Statement of Competence

3.1 The FRAEW has been carried out by engineers and technicians who have the appropriate level of experience and expertise in respect of the inspection, assessment and provision of advice in connection with external walls.

3.2 The full scope of the FRAEW services provided by Harris Associates are executed in-house. This extends to the planning and preliminary site inspection assessments, desktop assessments, all on-site investigations and the preparation of the output FRAEW report.

3.3 Competency Statement of the Assessor:

The principal engineer engaged in connection with the production of this FRAEW on behalf of Harris Associates is Mr. Tamer Duman who has gained in excess of 12 years' experience in façade engineering and fire safety including the design of new and investigations on the existing buildings. His core special abilities have been developed in the fields of fire safety, forensic investigation, construction oversight, intrusive assessments, and particularly in the context of multi-storey residential blocks, mixed use developments and education / student accommodation assets.

As the Head of Façade Consultancy at Harris Associates, Tamer is responsible for the delivery of all façade(s) and cladding related services, extending across our investigations, design guidance and consultation, due diligence provision, statutory compliance and construction oversight. I lead the team of skilled professionals on the delivery of FRAEW's across England and Wales.

3.4 Mr. Duman holds the following professional memberships:

→ Chartered Engineer, Engineering Council (CEng)
→ Full Member of Institution of Chartered Institution of Building Services Engineers (MCIBSE)
→ Full Member of Chartered Association of Building Engineers (C. Build E MCABE)
→ Full Member of the Society of Façade Engineering (MSFE)

3.5 As required by the PAS 9980 guidance Tamer Duman makes the following statement:

→ I have read and understood the commentary and provisions relating to the competence of external wall assessors set out in Section 8 and Annex H of PAS 9980:2022.
→ I have adequate and relevant competence to undertake an FRAEW.
→ I have sufficient knowledge, skills and experience in relation to fire safety of external walls to be able to complete an assessment at the level required.
→ I have the relevant skill, knowledge and experience to manage and interpret the results of intrusive inspections.
→ I have the competence to appraise and assess the nature of external wall construction in terms of fire performance and provide an opinion on the risk.
→ There are no conflicts of interest in the production of this report. The conclusions of the reports are my independent assessment of the risks and remedial actions and have not been influenced in any way by the opinions or actions of others.

On behalf of Harris Associates

Section 4. Instructions, Confirmation Of Parties

Confirmation of instructions received, client and other relevant parties

Harris Associates have been instructed by 145 Drury Lane (Management) Limited to undertake a Fire Risk Appraisal of External Wall (FRAEW) assessment in line with PAS 9980.

The confirmation of instruction was received via email on the 22nd of March 2024.

On the 1st of May 2025, the invasive and visual surveys were carried out by Harris Associates with an access contractor team assisting us with opening and making good works.

Section 5. Evidence of Documents Reviewed

5.1 Harris Associates were provided with the building` s fire risk assessment. Therefore, the building's fire risk assessment has been taken into consideration as part of this FRAEW.

Reviewed Document(s):

Latest Fire Risk Assessment (dated 2021) by Tri-Fire

Scanned plan of the premises of the property

Scanned floor plans

O&M Manuals inspected on-site (paper copies) to include Floor Plans, Elevation drawings and Sections through elevations

Service record of sprinkler system conducted on 14/04/2025

Section 6. Applicable Building Regulations and Approved Document B

6.1 Based on the information we received and having conducted a planning research, we understand that the building was originally constructed in 1916, and was repurposed during 2000, presumably under the Building Regulations 1991, with amendments made in 1999 and the relevant Approved Document B which was in effect at the time of construction (ADB 1999).

6.2 Building Regulations are a statutory instrument. i.e. it is a law. Building Regulations set standards for the design and construction of buildings, including minimum standards for fire safety, usually evidenced via linear design & / or testing.
The functional requirements of the fire performance are subject to Schedule 1 B1 to B5 requirements :

- 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 F&R Service

6.3 In the context of external wall systems and façades, the current Building Regulations 2010 Schedule 1 requires:

B4.(1) "external walls of the building shall adequately resist the spread of fire over the walls and from one building to another, having regard to the height, use and location of the building".

B3.(4) "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"

The need to assess and manage the risk of external fire spread applies to buildings of any height. With regard to B4(1) this regulation has not been the subject of any amendment and is therefore considered as the de facto standard since at least 2000.

6.4 Government provides guidance on how to satisfy the Building Regulations standards, via published documents referred to as Approved Documents. These Approved Documents provide general guidance on the performance expected of materials and building work in order to comply with the Building Regulations and they also provide practical examples and solutions on how to achieve compliance for some of the more common building situations.

6.5 Approved Document B (ADB) provides practical guidance with respect to required performance provisions of the fire safety elements of the Building Regulations.

6.6 Although ADB does not cover all possible building scenarios and may not be applicable in all cases to all buildings, ADB does provide guidance in respect of the following:

→ Restricting the risk of ignition by an external source to the outside surface of a building.

→ Restricting the spread of fire over the outside surface of a building.

→ Constructing external walls / attachments so they do not contribute to rate of fire spread.

→ Assembly of materials and components so they do not contribute to the rate of fire spread.

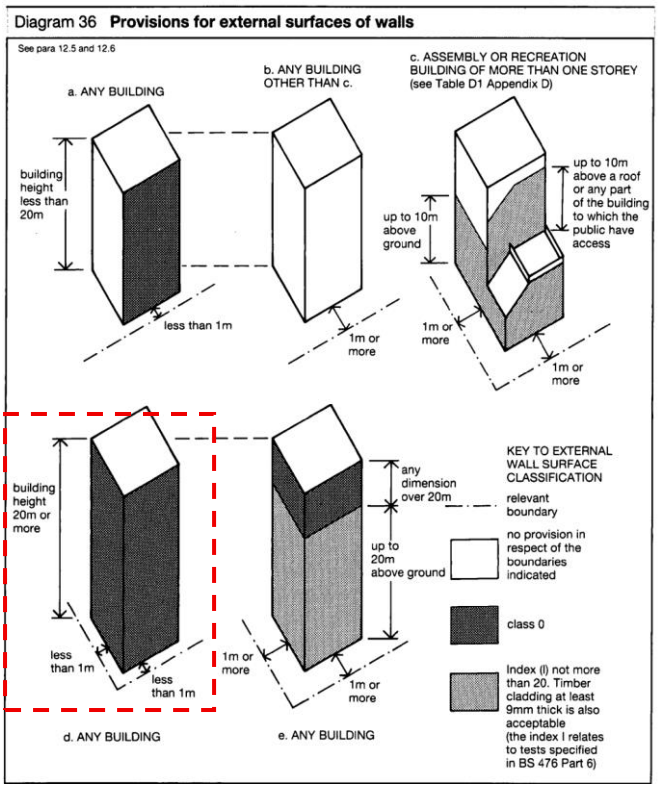


Table 13 **Provision of cavity barriers**

Cavity barriers to be provided:	Purpose group to which the provision applies(3) 1b & c dwelling houses	1a Flat or maisonette	2 Other residential and institutional	3-7 Office, shop & commercial, assembly & recreation, industrial, storage & other non-residential
1. At the junction between an external cavity wall, which does not comply with Diagram 28, and a compartment wall that separates buildings; and at the top of such an external cavity wall.	x	x	x	x
2. Above the enclosures to a protected stairway in a house of three or more storeys (see Diagram 29a). (1)	x	-	-	-
3. At the junction between an external cavity wall which does not comply with Diagram 28, and every compartment floor and compartment wall.	-	x	x	x
4. At the junction between a cavity wall which does not comply with Diagram 28 and every compartment floor, compartment wall, or other wall or door assembly which forms a fire resisting barrier.	-	x	x	x
5. In a protected escape route, above any fire resisting construction which is not carried full storey height, or (in the case of a top storey) to the underside of the roof covering.(1)	-	x	x	x
6. Above any bedroom partitions which are not carried full storey height, or (in the case of the top storey) to the underside of the roof covering.(1)	-	-	x	-
7. Above any corridor enclosures which are not carried full storey height, or (in the case of the top storey) to the underside of the roof covering, where the corridor (which is not a protected corridor) should be sub-divided to prevent fire or smoke affecting two alternative escape routes simultaneously (see paragraph 3.21 & Diagram 30).(2)	-	-	x	x
8. To sub-divide any cavity (including any roof space) so that the distance between cavity barriers does not exceed the dimensions given in Table 14.	-	-	x	x
9. Within the void behind the external face of rainscreen cladding at every floor level, and on the line of compartment walls abutting the external wall, of buildings which have a floor more than 20m above ground level.	-	x	x	-

Key x provision applies
- provision does not apply

Notes
1. The provisions in items 2,5 and 6 do not apply where the cavity is enclosed on the lower side by a fire resisting ceiling (as shown in Diagram 31) which extends throughout the building, compartment or separated part.
2. The provision of item 7 does not apply where the storey is sub-divided by fire resisting construction carried full storey height and passing through the line of sub-division of the corridor (see Diagram 30), or where the cavity is enclosed on the lower side as described in Note 1.
3. The classification of purpose groups is set out in Appendix D, Table D1.

Extracts from ADB 1992 showing the provisions for external surfaces or walls and provisions for cavity barriers.

6.7 Given that the property is above 18m, the applicable ADB at the time for the external surfaces that are less than 1000mm from the relevant boundary requires index (I) not more than 20.

6.8 With regards to the fire performance of the insulation material, ADB states " In a building with a storey at more than 20m above ground level, insulation material used in the external wall construction should be of limited combustibility product, filler material (not including gaskets, sealants and similar) etc. used in the external wall construction should be of limited combustibility (see Appendix A). This restriction does not apply to masonry cavity wall construction which complies with Diagram 28 in Section 9."

6.9 The external envelope of a building should not provide a medium for fire spread if it is likely to be a risk to health or safety. The use of combustible materials for cladding framework, or of combustible thermal insulation as an overcladding or in ventilated cavities, may present such a risk in tall buildings, even though the provisions for external surfaces in Diagram 36 may have been satisfied.

6.10 It is not compulsory to follow the provisions detailed in ADB and other methodologies are possible to evidence compliance with Building Regulations. These alternatives include:

→ Adoption of a full fire engineering solution.

→ Achieving a BR135 classification (for an external wall system) via a BS 8414 test.

6.11 However, following the guidance of ADB is considered the most common and widely adopted methodology when seeking to evidence compliance with Building Regulations. Where the provisions in ADB do not cover a scenario in a building, or if it is specifically decided not to follow a provision in ADB, a building then needs to be assessed under one of the referred methodologies to establish that the building in question complies with the performance provisions of the Building Regulations.

6.12 Please note that the legal implications of compliance or non-compliance with ADB are addressed in section 7 of the Building Act 1984 but fall outside the scope of this FRAEW report. Furthermore, PAS 9980 considers that it would be unreasonable to expect an existing building necessarily to comply with the most up to date Building Regulations.

6.13 PAS 9980 references ADB and notes the relevance of ADB in the context of understanding potential issues regarding ignition risk, propagation / external fire spread, possible mitigation measures etc. PAS 9980 also notes that it is important to understand the thinking and approach behind the relevant version of the Building Regulations and applicable guidance such as ADB, and how this has altered over the years.

6.14 Compliance with the Building Regulations has been taken into consideration as part of this assessment and to that end in respect of the building ADB has been used as a benchmark guidance but has not overtly determined the outcome of this FRAEW.

6.15 The current Building Regulations and Approved Document B (fire safety) volume 1: Dwellings, 2019 edition (incorporating 2020 and 2022 amendments) requires that all external wall components for a relevant buildings (with storey height over 18m), such as this block, be constructed with Euroclass A2, s1-d0 or better materials, including the insulation products. The provision of cavity barrier and the functional requirements of the current building regulations and ADB have not changed.

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
Assembly and recreation	More than 18m	Class B-s3, d2[2] or better	From ground level to 18m: class C-s3, d2[3] or better From 18m in height and above: class B-s3, d2[2] or better
	18m or less	Class B-s3, d2[2] or better	Up to 10m above ground level: class C-s3, d2[3] or better Up to 10m above a roof or any part of the building to which the public have access: class C-s3, d2[3] or better[4] From 10m in height and above: no minimum performance
Any other building	More than 18m	Class B-s3, d2[2] or better	From ground level to 18m: class C-s3, d2[3] or better From 18m in height and above: class B-s3, d2[2] or better
	18m or less	Class B-s3, d2[2] or better	No provisions

NOTES:

In all cases all the following provisions apply.

- Regulation 7(1A) prohibits the use of relevant metal composite materials in the external walls, and specified attachments, of all buildings of any height (see paragraphs 10.11 and 10.12).
- The advice in paragraph 10.4 should always be followed.

In addition to the provisions within this table, buildings with a storey 18m or more above ground level should also meet the provisions of paragraph 10.6.

In addition to the provisions within this table, buildings with a storey 11m or more above ground level should also meet the provisions of paragraph 10.7.

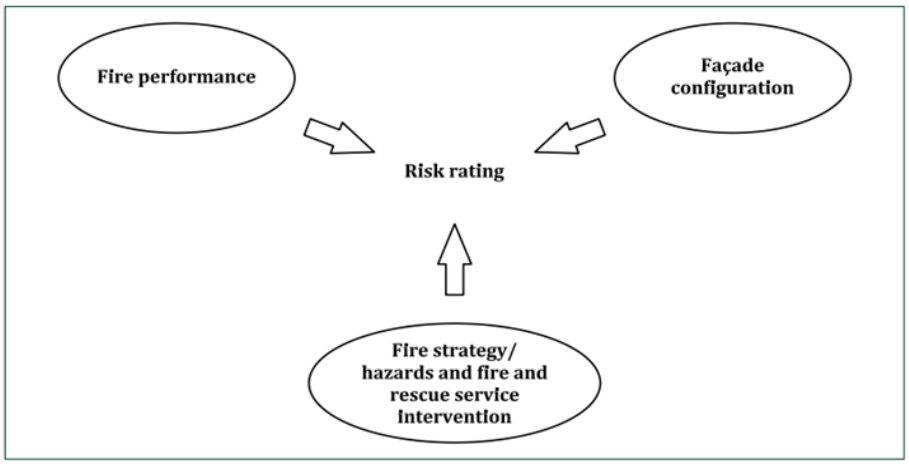
1. The restrictions for these buildings apply to all the materials used in the external wall and specified attachments (see paragraphs 10.13 to 10.16 for further guidance).
2. Profiled or flat steel sheet at least 0.5mm thick with an organic coating of no more than 0.2mm thickness is also acceptable.
3. Timber cladding at least 9mm thick is also acceptable.
4. 10m is measured from the top surface of the roof.

6.16 Consequently, it is reasonably considered that the building` s external envelope complies with the relevant Building Regulations that were in effect at the time of its construction, as well as with current Building Regulations.

Section 7. APPLICATION OF PAS 9980

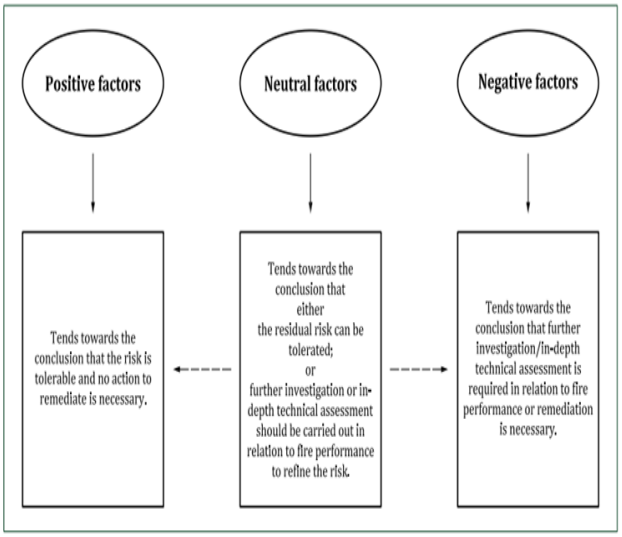
7.1 Application of PAS 9980: Risk Rating

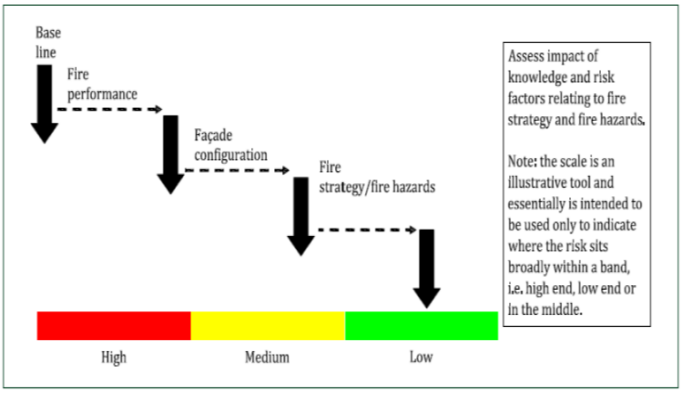
7.1.1 There are three key considerations in arriving at a risk rating for external walls from PAS 9980 guidance. Each of these three considerations hold a group of risk factors relevant to risk of fire spread over the external walls.



7.2 Application of PAS 9980: Risk Influence & Weighing

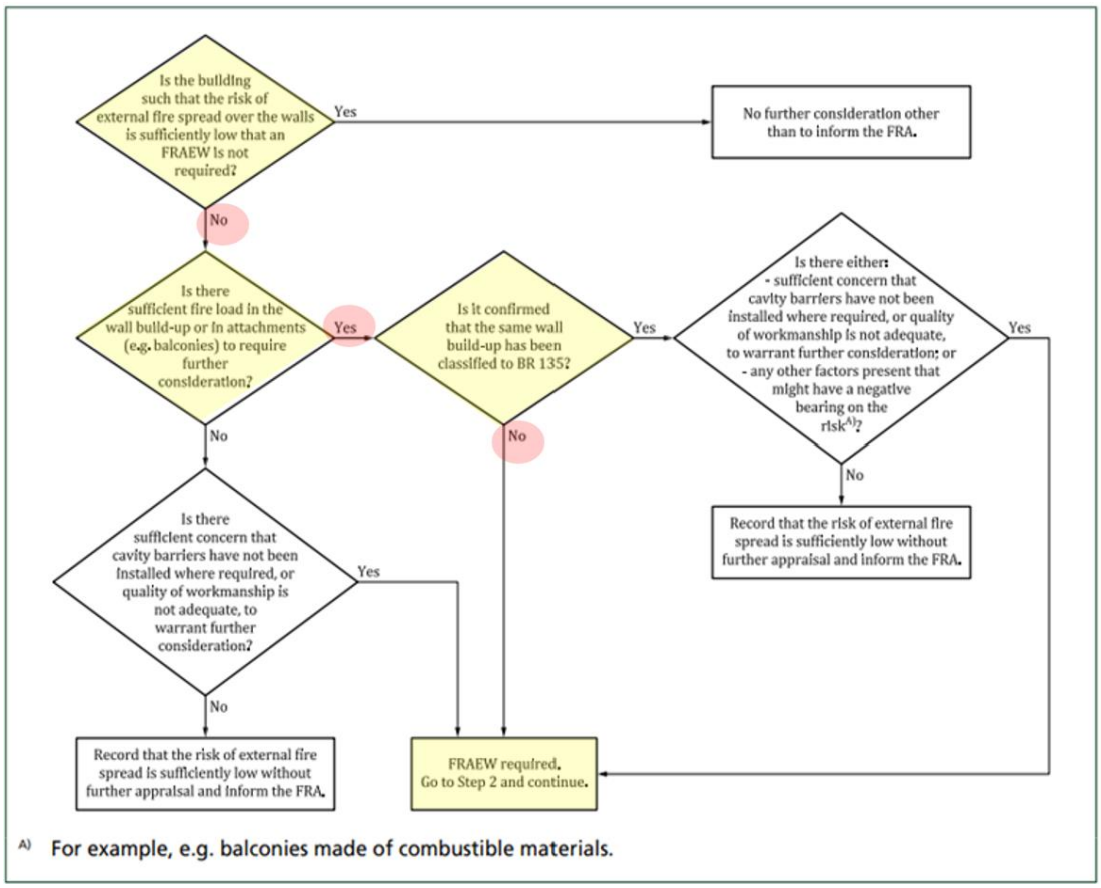
7.2.1 Each risk factor is to be considered and determined if it has a positive, negative or neutral influence, and the weight of each risk on the overall fire risk.
A positive factor limits the possibility of secondary fires igniting within the building.
A neutral risk factor does not have a great influence on the chance for secondary fires to ignite.
A negative risk factor would notably influence the chance of secondary fires across the external wall.
The illustration below has been extracted from the PAS 9980 to highlight the findings of the risk factor analysis is overlayed to determine the overall risk.





7.3 FRAEW Determination, PAS 9980 Benchmark Criteria & Key Principles

7.3.1 APPENDIX A: FRAEW Determination, PAS 9980 Benchmark Criteria & Key Principles



7.3.2 In summary the PAS 9980 outlines a five-step approach as follows:

→ Step 1 – Confirm that a full FRAEW is required.

→ Step 2 – Gather all necessary information to complete the FRAEW.

→ Step 3 – Identify and group factors that are significant in determining the risk rating.

→ Step 4 – Consider risk factors to determine their potential contribution to overall risk.

→ Step 5 – Review risk factor analysis against benchmark success criteria to determine outcome.

7.3.3 Benchmark Criteria

7.3.3.1 The benchmark criteria for a PAS 9980 compliant FRAEW is as follows:

(i) That fire spread is likely to result in only limited secondary fire and / or either occur at a rate within expectations for a building of this height

(ii) or at a higher / faster but still tolerable rate, given the circumstances at the building in question; and/or

(iii) That occupants in places to which fire has spread are not unduly harmed, or prevented from escaping, by the time such secondary fires occur; and/or

(iv) That secondary fires do not compromise the communal means of escape before those needing to use the escape routes have left the building; and/or

(v) That fire and rescue service intervention is likely to be effective in avoiding undue secondary fires, or in ensuring that occupants at risk are not prevented from escaping or can be rescued.

7.3.3.2 Other notable considerations in respect of using and applying benchmark criteria include the following:

a. Failure to meet benchmarks for external wall construction in the Building Regulations current or at the time of construction, should not be used as the sole basis of determining the outcome of the FRAEW.

b. The requirements for remedial works are based on measures which are reasonably practicable. The cost, time and effort in eliminating the hazard should not necessarily be grossly disproportionate to the risk created by the hazard.

c. Compliance with BR 135 typically is considered low risk. However, failure with BR 135 does not inherently mean an unacceptable risk.

d. Acceptable risk in the context of this PAS might not be equivalent to acceptable risk in the case of the fire-engineered solution for the design of a new building.

e. A fundamental premise of controls on external walls under building regulations/guidance has always been that the possibility of fire spread across the compartment floor to the flat above is accepted provided that the risk to life safety remains at an acceptable level. But it is not expected to occur at such speed that intervention by fire and rescue service cannot be effective

7.3.3.3 Under PAS 9980, the risk-based assessment approach is to take account of the following:

(i) The combustibility and fire performance of external wall construction and cladding.

(ii) The likelihood of undue speed of fire spread over the external walls of the building.

(iii) The likelihood of secondary fires, (occurrence and extent).

(iv) Whether the secondary fire is likely to result in direct harm to occupants or prevent them escaping.

(v) The likely consequences in terms of evacuation form the onset of untenable conditions (considering type of escape strategy being simultaneous evacuation, stay put or a hybrid).

(vi) The role of fire and rescue service intervention, its effectiveness, and its limitations.

(vii) The time it might take for adverse consequences to occur and whether this can be mitigated by, for example, suitable fire safety design.

(viii) The extent and effectiveness of fire safety management.

7.4 Key Principles & Intent of PAS 9980

The intent of the PAS 9980 assessment is to satisfy the Fire Safety Order.

Building design varies considerably and no code of practice such as the PAS 9980 can ever provide guidance for all possible circumstances. Accordingly, although PAS 9980 refers to specific materials, systems and configurations used in external wall construction, it cannot address all possible circumstances, and the general principles set out within the PAS need to be applied carefully when considering other types of external wall construction that are not specifically addressed within the PAS.

In addition to providing recommendations and a recognized methodology, a further objective of PAS 9980 is to assist those receiving an FRAEW, and their other advisers, to understand the meaning of the risk rating determined by the methodology, how the risk rating was derived, where it fits in the context of the building's FRA and the limitations that apply to it.

Section 8. General Description of the Property

8.1 General Information

145 Drury Lane is a large residential block comprising of a concrete frame, solid floors / ceilings and flat roof(s) with a combination of solid masonry brick, Portland stone, conventional render and limited terracotta cladding tile envelope to the façades.

The building is 7-stories in height (ground floor and 6 upper floors) and therefore exceeds the 18m-tall building threshold. The original building was developed in 1916 as a Tobacco Warehouse, and was converted into residential apartments in 2000. It features a refuse store accessible via the outside, which appears to be adequately compartmentalized, and an underground car park with seemingly sufficient ventilation provided and adequately segregated from the rest of the building.

The property occupies the intersection of Drury Lane and Great Queen Street, as well as Wild Street, which has a separate entrance. Some of the apartments overlook the Great Queen Street Piazza and the Freemason's Hall across the road.

8.2 Building Arrangements and Fire Safety/Strategy Measures

The property is split into 2 cores which are identified as Block A & B. The property has 2 Nos internal protected stairways one per core, both of which serve all floor levels. To block B, there are two separate staircases provided, where one of the staircases only runs from the 5th to the 6th floor. Additionally, both other staircases lead to the underground car park, where they are interconnected via a network of corridors. This would allow good access to all flats to escape using the stairwells in the event of a fire. There are two firefighting passenger lifts (one per core) at the property with adequate signage saying not to be used in the event of a fire.

We were provided with the previous FRA document for review from 2021. The FRA states the building adopts a ‘stay put’ evacuation strategy is in place.

Good vehicular Fire & Rescue service access is available to the building from Drury Lane and Great Queen Street, as well as Wild Street, for fire services to reach the building, however accessing the courtyard may prove challenging, as the only route to access that is over the roof of the pub, sharing a joint wall with the property, overlooking the plaza.

The building is occupied by general needs housing and thus it is assumed that occupants represent a typical cross-section of the local population and are therefore not especially vulnerable or at risk as a majority, and the premises do not hold sheltered or extra care housing support.

There are cantilevered balconies and terraced balconies on site that have all-metal construction, and paved tiles respectively, with no soffits in place. Where the cantilevered balconies are vertically stacked, these are only constructed using thick, non-combustible, metal materials. Overall, no combustible materials were identified for the balconies.

8.3 Building Storey Height

The uppermost storey height is 20.01 metres, retrieved from the building elevation drawings reviewed on site.

The storey height is derived from the Approved Document B (fire safety) volume 1: Dwellings, 2019 edition incorporating 2020 and 2022 amendments. The top storey height is measured as shown below in ADB`s Appendix D, Diagram D6 from the lowest ground point to the highest habitable finish floor level.

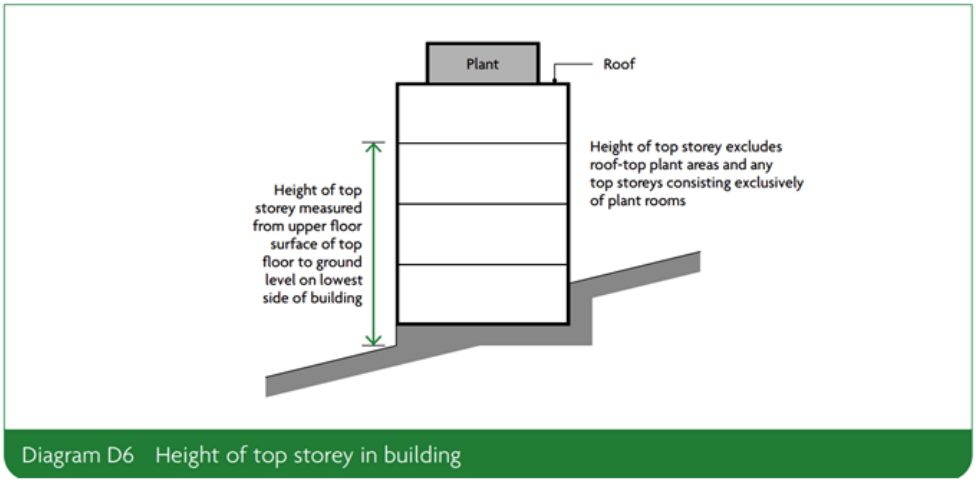
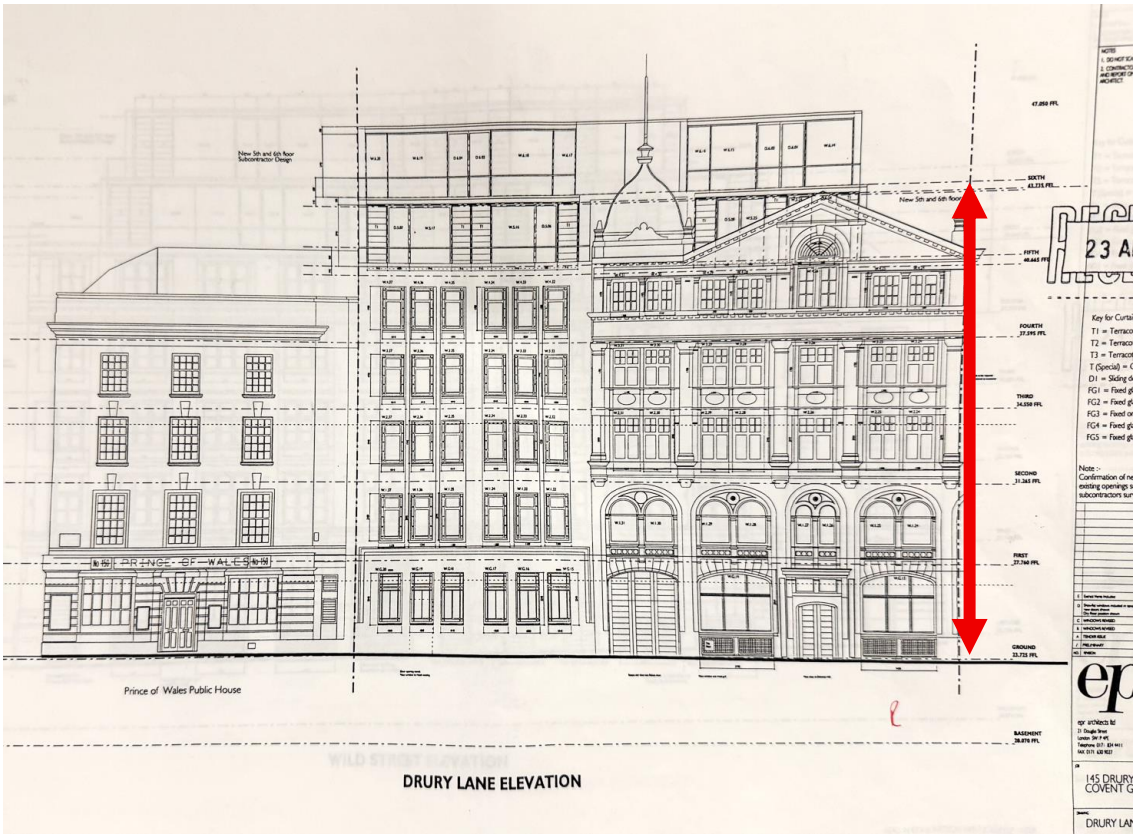


Diagram D6 Height of top storey in building

8.5 Internal Escape Staircase Highlight



Elevation Drawing

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8.6 Internal Escape Staircase Highlight

Escape staircases overview

Section 9. Internal Fire Safety Measures / Strategy in Place

Photo 3 – Fire alarm panel, with error displayed for Zone1

Photo 4 – Smoke vents triggers

Photo 5 – Fire Fighting lift signage; No-smoking sign

Photo 6 – Fire Action Plans are displayed around the building

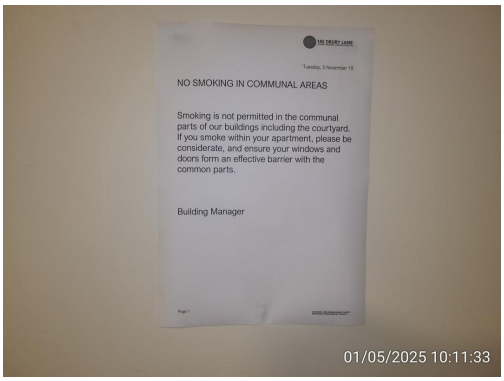


Photo 7 – No smoking notice

Photo 8 – Dry riser outlet overview

Photo 9 – Some internal compartmentation is carried out with concrete infills

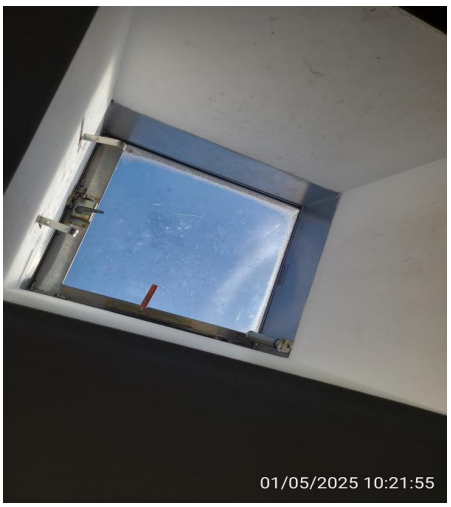


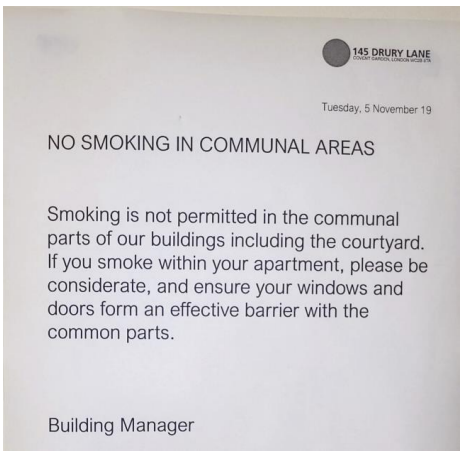
Photo 10 – Overview of the Automatic Opening Ventilation (AOV) unit at the top of the staircase.

Photo 11 – Ventilation Alarm Panel overview

Photo 12 – Fire Alarm call point overview

Building Management Policies

No record of Building Management Policy was received.
However, during our investigation of the premises, we did not observe any barbecues being used on the balconies or terraces. No smoking signs were displayed appropriately.



The building operates a No-Smoking policy across all communal areas

Section 10. Building Attachments

Attachments Overview

Photo 13

Photo 14

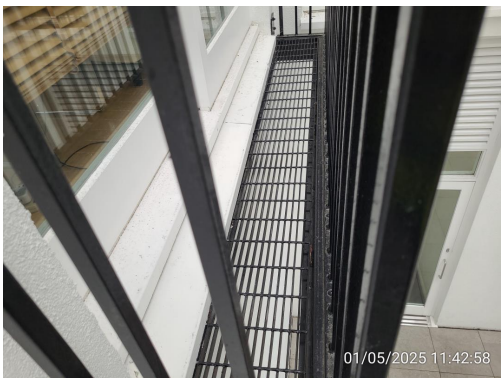


Photo 15

Photo 16

Section 11. Fire Strategy Risk Factors (PAS9980 Annex F)

1. Occupancy	
General needs housing. The building houses occupants with varying degrees of physical disability in line with the general population expected.	Neutral
2. Evacuation Strategy	
The latest FRA from 2021 states that the building operates a “Stay Put” policy for the residential areas. The car park has a full evacuation procedure in place with manual call points, sounders and detection.	Neutral
3. Escape Route design	
Single protected internal staircase provided per core, with lobby approach – interconnected via the basement. Travel distances are within acceptable limits.	Neutral
4. Compartmentation	
FRA identifies inadequacies in the compartmentation. For the purposes of this FRAEW, deficiencies identified in FRA or compartmentation survey are expected to be rectified and are not considered. Any defects relating to internal compartmentation must be investigated and remediated.	Negative
5. Smoke Control	
FRA notes that vents provided to communal areas and an AOV are available on the top of each staircase. Furthermore, a mechanical smoke extraction provided in the car park.	N/A
6. Fire Detection and Fire Alarm System	
FRA notes that suitable fire alarm and detection system in place.	Neutral
7. Fire Suppression	
Sprinkler system installed inside the car park and basement service rooms, and interim service carried out on 14/04/2025	Neutral
8. Firefighting Facilities	
Generally, the building has adequate access for firefighting vehicles.	Neutral
9. Rising Mains	
Suitable rising mains installed, with inlets / outlets	Neutral
10. Firefighting Lifts	
Firefighting Lift(s) fitted, as is appropriate for this type of building.	Neutral
11. Specific Fire Hazards	
Underground car park is available in the basement of the building. Refuse store is available inside the ground floor of the building.	Negative

Section 12. External Walls Investigations and Findings

12.1 Façade Investigations

12.1.1 The invasive and visual surveys were carried out by Harris Associates with an access contractor team. The survey was conducted using a borescope by core-hole drilling through the external façades and opening up the select pre-identified wall areas to view the cross-sectional compositions of the external wall systems.

12.1.2 This enabled us to partially identify the materials present within the wall cavities and helped us to understand the overall façade components, configuration and fire performances to support our assessment.

12.1.3 The invasive surveys were carried out in multiple locations to ensure that we obtained a high degree of certainty and consistency in the context of our findings.

12.1.4 The aim is also to confirm the location of key safety components of the External Wall Types including cavity barriers and fire stops, check location, type and condition of primary materials, and check the quality of workmanship of the construction and installation works.

12.1.5 Intrusive investigations have been strategically conducted and targeted at key locations. These investigations focused primarily on compartment walls & floors, around façade fenestrations and penetrations and at other critical junctions. The aim was to thoroughly examine these crucial locations within the wall structure.

12.2 Building Overview Photographs

Photo 17

Photo 18

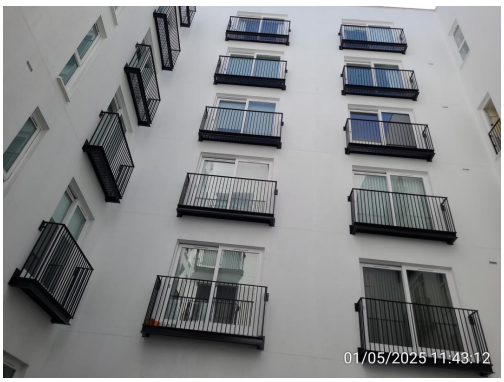


Photo 19

Photo 20

12.3 Overview of intrusive investigations locations

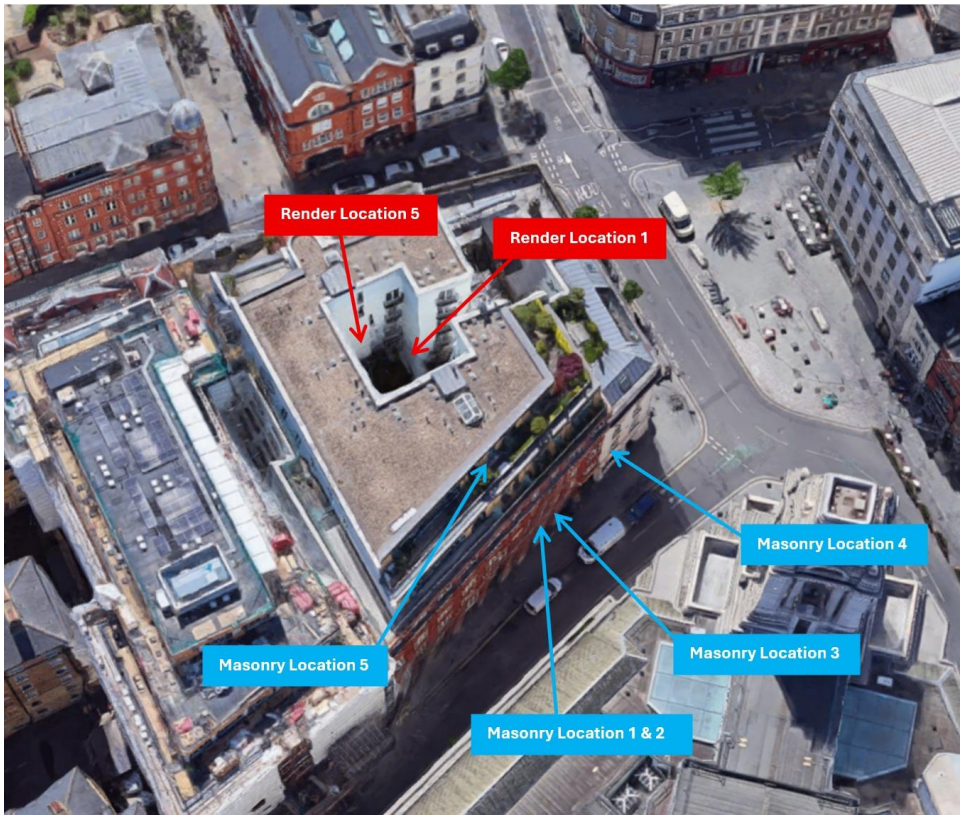


Photo 21

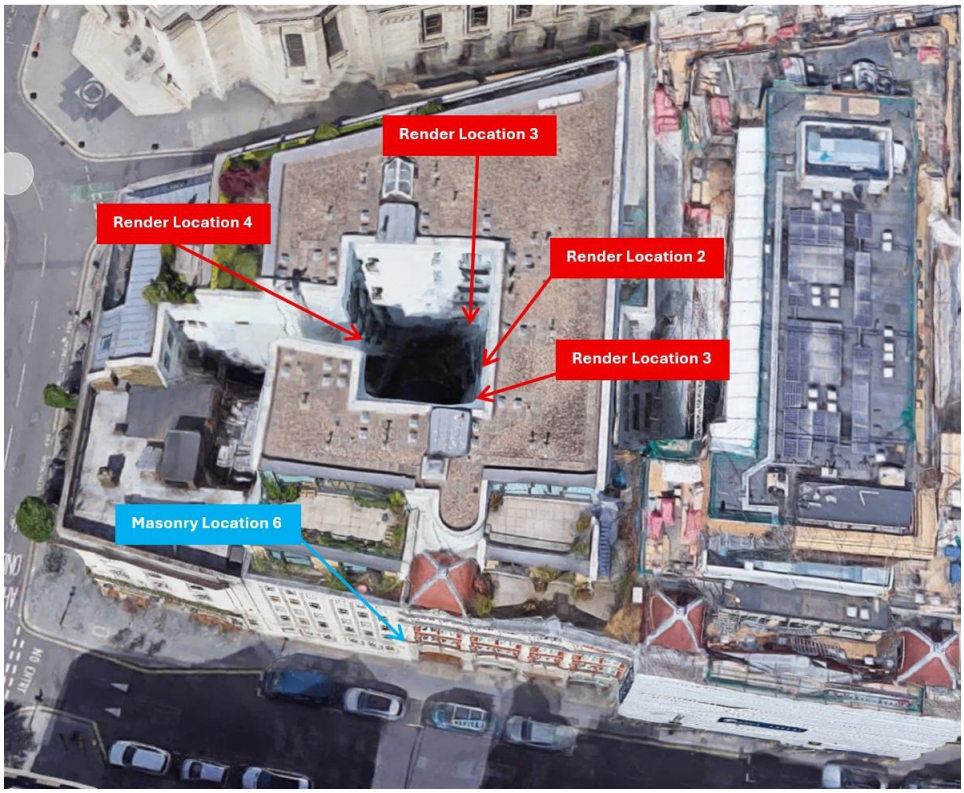

Render Location 3
Render Location 4
Render Location 2
Render Location 3
Masonry Location 6

Photo 22

12.4 Investigation and Description of External Wall Type 1

EW-1: Investigation Location 1

Investigation Photographs

Photo 23

Photo 24

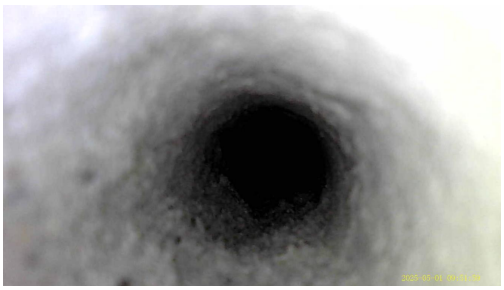


Photo 25

Photo 26

Photo 27

Photo 28

Investigation Findings

Window frame Jamb investigation to ground floor, North elevation, courtyard sliding door.

Thick 10mm cementitious render layer was applied directly on a 100mm blockwork. The blockwork leads to a 70mm cavity, followed by a 75mm mineral wool insulation. The insulation is applied mechanically onto an inner blockwork layer, forming the external wall infill. This leads to the inner plasterboard lining.

The blockwork returning to the side of the window frame was observed to form an adequate cavity closer, as it was observed to terminate against the internal blockwork leaf by the means of a vertical mortar joint.

EW-1: Investigation Location 2

Investigation Photographs

Photo 29


Photo 30


Photo 31


Photo 32


Photo 33

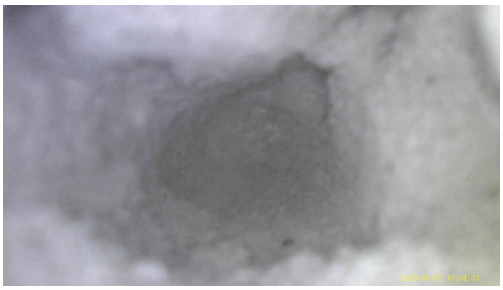


Photo 34

Investigation Findings

Compartment wall investigation, to floor one, East elevation - Courtyard

Thick 10mm cementitious render layer was applied directly on a 100mm blockwork.
The blockwork leads to a 70mm cavity, followed by a 75mm mineral wool insulation. The insulation is mechanically fixed onto an inner blockwork layer.
This leads to the inner plasterboard lining.

No vertical fire barrier was observed in place at the compartment wall location, however, all materials comprising the external wall are non-combustible. Furthermore, the provision for fire barrier is not required per ADB.

EW-1: Investigation Location 3

Investigation Photographs

Photo 35


Photo 36

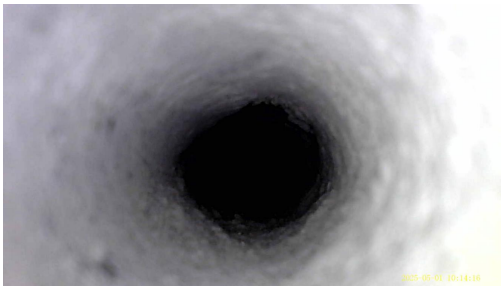


Photo 37

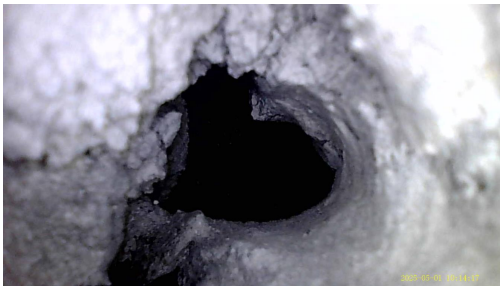


Photo 38


Photo 39


Photo 40

Investigation Findings

Investigation of ventilation duct penetration, ground floor, West elevation - Courtyard

Thick 10mm cementitious render layer was applied directly on a 100mm blockwork.
The blockwork leads to a 70mm cavity, followed by a 75mm mineral wool insulation. The insulation is mechanically fixed onto an inner blockwork layer.
This leads to the inner plasterboard lining.

The ventilation penetration did not appear to feature any firestopping materials installed around it. Instead, the plastic duct is directly exposed to the cavity.

EW-1: Investigation Location 4

Investigation Photographs


Photo 41


Photo 42

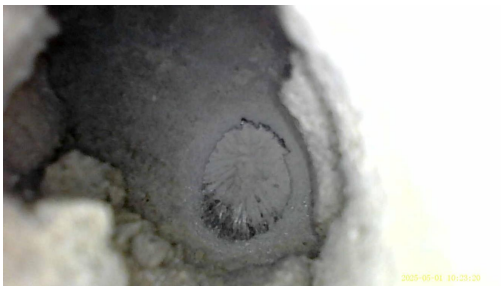


Photo 43


Photo 44


Photo 45


Photo 46

Investigation Findings

Compartment floor investigation, First floor balcony installation detail - North elevation - Courtyard

Thick 10mm cementitious render layer was applied directly on a 100mm blockwork.
The blockwork leads to a 140mm cavity, partially clogged by mortar.
The cavity features the bolt-on balconies overlooking the courtyard.
The balconies were observed to be mechanically fixed to the superstructure of the building, by the means of threaded rods and nuts.

No horizontal fire barriers were observed to be in place at the floor slab level to this location. However, the provision for fire barrier is not required per ADB.

EW-1: Investigation Location 5

Investigation Photographs

Photo 47

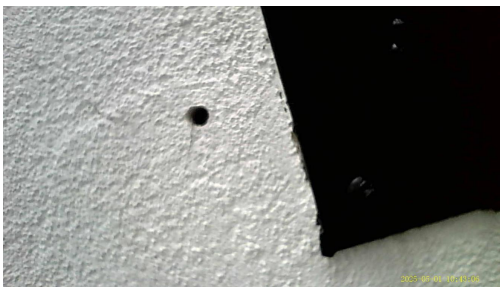


Photo 48


Photo 49


Photo 50

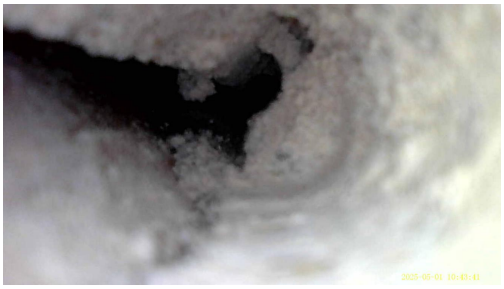


Photo 51


Photo 52

Investigation Findings

Window jamb investigation, near balcony railing, First floor balcony - West elevation - Courtyard

Thick 10mm cementitious render layer was applied directly on a 100mm blockwork.
The blockwork leads to a 140mm cavity, partially clogged by mortar.
The cavity features mineral wool insulation, fitted in the cavity leading away from the window

Penetrating the façade in this location revealed the blockwork return runs continuously across the cross-section of the external wall, creating an adequate cavity closer to the window frame jamb.

EW-1: Investigation Location 6

Investigation Photographs


Photo 53


Photo 54


Photo 55


Photo 56


Photo 57


Photo 58

Investigation Findings

Compartment floor location, South elevation, First floor slab - Courtyard

Thick 10mm cementitious render layer was applied directly on a 100mm blockwork.
The blockwork leads to a 140mm cavity, fully filled with mineral wool insulation. The insulation is fixed directly onto the slab edge.

The floor slab investigation at this location revealed the presence of a horizontal fire barrier fitted at the top of the floor slab.

12.4.1 Fire Risk Assessment for External Wall Type 1 – Render \

12.4.1.1 Generally

The render facade covers the entirety of the courtyard, as well as some of the return walls and an additional wall to the top floor of the East elevation. The EW-1 configuration is as follows:

- 10mm Cementitious Render layer.
- 100mm concrete blockwork.
- 70mm cavity with drainage provisions.
- 75mm mineral wool insulation
- Concrete backing wall (or lightweight block)

Some horizontal fire barrier provisions were observed to be in place.

12.4.1.1 Assessment

EW-1 configuration consists of materials such as cementitious render, mineral wool insulation and concrete blockwork for both the external leaf, and substrate wall, all of which achieve a Euroclass A1/A2 rating when tested in accordance with BS-EN13501-1 and are non-combustible materials. No proprietary cavity closers were identified within EW-1 compartment boundaries.

It was observed that the blockwork returns form adequate closers due to their construction. Our intrusive investigations revealed presence of horizontal fire barrier but not at all locations. However, the provision for fire barrier is not required per ADB.

Plastic ventilation ducts were observed throughout EW-1, penetrating the entire cross-section of the cavity without intumescent collars or any other proprietary fire stopping. However, due to the lack of combustible elements in this wall type, this should not present itself as being an issue. In a scenario where the uPVC ducting does combust into the EW-1 cavity, it is not likely toxic smoke and fire would spread at an uncontrollable rate, as EW-1 cavity is primarily constructed of non-combustible materials sufficient to delay fire spread and providing adequate time for occupants' safe evacuation.

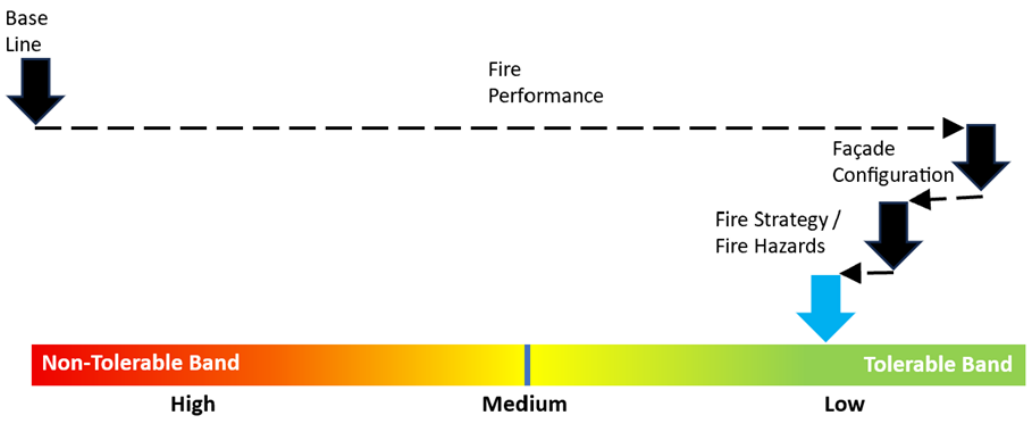
The plastic ventilation ducts and absence of vertical fire barriers is unlikely to result in the undue rate of fire and smoke spread between the compartments as EW-1 cavity is constructed with materials that does not contribute to combustion and masonry returns around openings form acceptable cavity edge closers to delay smoke and fire spread to neighbouring compartments.

12.4.1.1 Conclusion

Following the risk factors such as fire performance, façade configuration and fire strategy measures, as given in PAS 9980 guidance, the risk of external fire and smoke spread ought to be low due to render finish and two leaves of masonry wall construction as well as lack of any combustible material in the makeup of the wall type. Therefore, EW-1 does not pose a detrimental risk of external fire spread.

Consequently, we have holistically assessed and proportionately concluded that no remedial action is required to EW-1

External Wall Type 1 Overall Fire Risk Rating	Low



12.4.2 Fire Performance Risk Factors (PAS9980 Annex K) for External Wall Type 1 – Render

1. K.1: General (Materials Calorific Value)	
This wall type consists of a render finish directly applied on concrete blockwork. Cavities are partly filled with non-combustible mineral wool insulation. The overall calorific value expected to be achieved is <3MJ/kg	Positive
K.2: External Surface Reaction to Fire Classification	
Euroclass A1/A2 cementitious render finish	Positive
K.3: Facing / Cladding	
Non-combustible blockwork with low heat release rate (HRR)	Positive
K.4: Panel Construction	
Continuous cementitious Render layer with no open gaps or joints.	Positive
K.5: Cavities & Cavity Barriers Provision	
The rear of the blockwork (non-combustible) and inner masonry leaf (non-combustible) have fire barriers, albeit missing at some locations, but not required per ADB as cavities are closed around the openings	Positive
K.6: Insulation	
Non-combustible mineral wool insulation that achieves Euroclass A1 Non-combustible	Positive
K.7: Substrate	
The substrate is a mix of concrete slabs and posts, and concrete blockwork.	Positive
K:8: Sheathing Boards	
No sheathing boards are available to this EW Type	N/A
K.9: Insulated Core Panels	
There are no insulated core panels available to this EW Type	N/A
K.10: ETICS	
Thick cementitious render on block	Positive
K.11: Infill / Spandrel Panels	
This external wall type does not feature any infill and/or spandrel panels	N/A
K.12: Internal Finishes	
Inner plasterboard lining	N/A
Overall Risk Rating in accordance with Annex K	**Low**

12.4.3 Facade Configuration Risk Factors (PAS9980 Annex N) for External Wall Type 1 – Render

N.1: Building Height	
The building is more than 18 meters in height when measured from the ground to the uppermost storey.	Negative
N.2: Height of The Cladding Base from Ground Floor Level	
This external wall type starts less than 2 meters above the ground. However, the likelihood of a fire originating externally is very low due to the blockwork masonry layer behind the non-combustible cementitious render and fire spread not likely be rapid at an early stage in the development of the fire.	Neutral
N.3: Extent of Cladding	
Limited in extent such as to delay fire spread over the external walls	Neutral
N.4: Cavities	
Continuous vertically running cavity within two leaves masonry and openings are closed off with block returns, deemed neutral risk.	Neutral
N.5: Infill / Spandrel Panels	
No Infill / Spandrel Panels are available for this EW type	N/A
N.6: Setbacks	
Some locations of this external wall type are set back, which is seen as a positive risk factor.	Positive
N.7: Overhangs and Projections	
This external wall type does not feature any overhangs and/or projections	N/A
N.8: Proximity to Window and Other Openings to The Accommodation	
Horizontally adjacent to windows, and vertically in line with such openings. However, EW-1 is comprised fully of materials that do not contribute to combustion.	Neutral
N.9: Presence of Vents or Other Openings for Services In The Façade	
Vents pass through the cavity, however, ducts are wrapped with mineral wool insulation and the cavity does not include any combustible materials	Neutral
N:10 Proximity of Combustible Elements of a Façade to Escape Route Window and Other Openings	
Adjacent to windows and openings onto escape routes, but the same fire could not spread to affect more than one escape route	Neutral
N.11: Attachments	
The building features non-combustible open balconies	Positive
N.12: Proximity of Combustible Elements of a Façade Neighbouring Building	
Windows or other openings in adjacent or abutting neighbouring buildings that are sufficiently close that direct flame impingement from a fire in the neighbouring building is foreseeable	Negative
Overall Risk Rating in accordance with Annex N	**Medium**

12.5 Investigation and Description of External Wall Type 2 - Masonry

EW-2: Investigation Location 1

Investigation Photographs

Photo 59


Photo 60


Photo 61

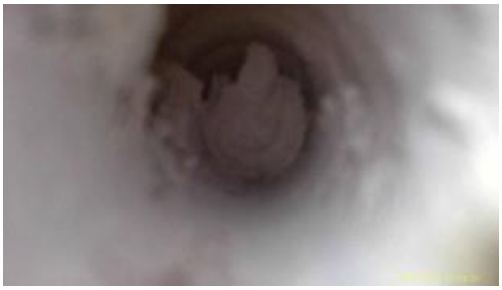


Photo 62


Photo 63

Investigation Findings

Masonry solid wall - Compartment wall investigation to first floor - North elevation

The brickwork external wall was established to be a thick, solid masonry construction wall with thickness that exceeds 450mm.
There are no cavities to this wall.

EW-2: Investigation Location 2

Investigation Photographs

Photo 64


Photo 65


Photo 66


Photo 67

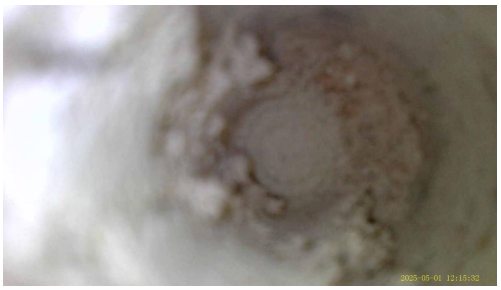


Photo 68

Investigation Findings

Masonry solid wall - Compartment floor investigation to first floor - North elevation

The masonry external wall was established to be a thick, solid masonry construction wall with thickness that exceeds 450mm.
There are no cavities to this wall.

EW-2: Investigation Location 3

Investigation Photographs


Photo 69


Photo 70


Photo 71


Photo 72


Photo 73


Photo 74

Investigation Findings

Masonry solid wall - Window jamb investigation to first floor - North elevation

The brickwork external wall was established to be a thick, solid masonry construction wall with thickness that exceeds 450mm.
There are no cavities to this wall.
A small air pocket was observed circa 380mm inside the wall, however, this was discovered to likely be a void created by the masonry laying process and does not constitute a continuous cavity.

EW-2: Investigation Location 4

Investigation Photographs

Photo 75

Photo 76

Photo 77

Photo 78

Photo 79

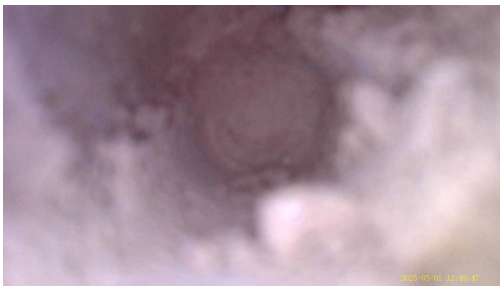


Photo 80

Investigation Findings

Masonry solid wall - Portland Stone investigation to first floor - North elevation

The Portland stone external wall was established to be a thick, solid masonry construction wall with thickness that exceeds 450mm.
There are no cavities to this wall.

The Portland stone-effect was observed to be a thin layer of non-combustible stone, applied on top of the brickwork investigated at previous locations which is a solid wall with at least 450mm thickness.

EW-2: Investigation Location 5

Investigation Photographs


Photo 81


Photo 82


Photo 83


Photo 84


Photo 85

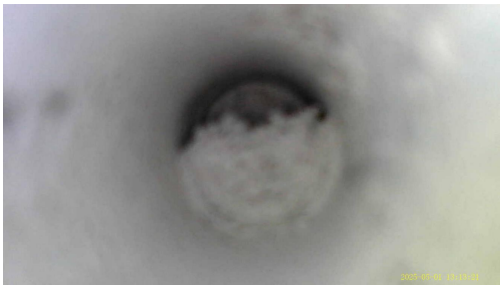


Photo 86

Investigation Findings

Masonry solid wall - Marble Stone investigation to first floor - South elevation

The Marble stone external wall was established to be a thick, solid masonry construction wall with thickness that exceeds 450mm.
Circa 100mm marble was observed to be directly applied on the inner masonry layer, forming the overall thickness.
There are no cavities to this wall.

EW-2: Investigation Location 6

Investigation Photographs

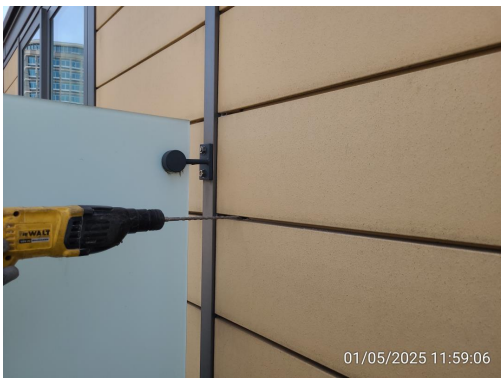


Photo 87


Photo 88


Photo 89

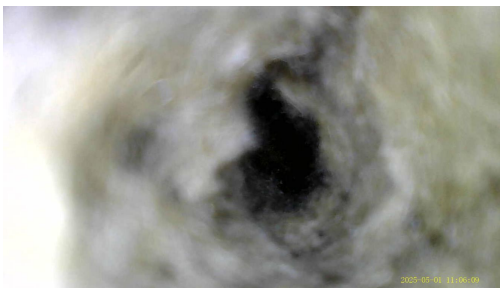


Photo 90


Photo 91

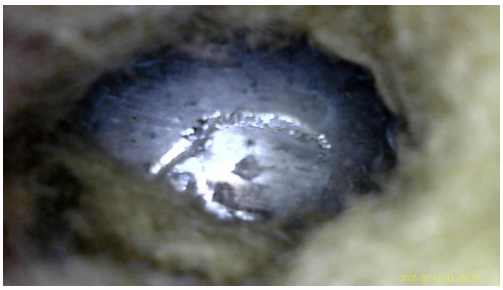


Photo 92

Investigation Findings

Terracotta-tile infill panel to compartment wall location, North elevation.

Terracotta tiles glazed into curtain walling system.
35mm terracotta interlocked tiles comprising an infill panel.
A small gap was observed behind the terracotta tiles, formed by the supporting framework.
A paper-like membrane leads to a cavity, infilled with mineral wool insulation.
The panel was observed to be backed by a thick solid metal sheet backing, leading into the internal wall.

No combustible materials were observed to be used within the make-up of the infill panels.

12.5.1 Fire Risk Assessment for External Wall Type 2 - Masonry

12.5.1.1 Generally

The portion of the building that has been retained from the original building is fully covered with External Wall 2 which comprises a multiple-course brick wall. To the ground floor on all elevations, the solid masonry walls have features applied on the external face, such as Portland Stone, Marble stone and blockwork exteriors. Generally, the build-up of EW-1 was identified as follows:

- Varying masonry exteriors
- Solid masonry wall with thickness of at least 450mm
- No cavities are present to this EW type.
- Inner plasterboard lining

There are infill panels installed to the top two floors, in between the fenestrations. The panels have been glazed into the curtain walling installed to the top two floors, where each floor is set back from the previous by no less than 1.2 meters, creating a sufficient set back. For the purpose of this report, the terracotta panels have been classified as a sub-type of EW-2. The terracotta panels build-up is generally as follows:

- 35mm Interlocked Terracotta Tiles
- Small gap (Circa 20mm)
- Membrane
- Cavity
- Mineral Wool Insulation
- Metal backing plate.

12.5.1.2 Assessment

The EW-1 wall build up does not incorporate any cavities or insulation and is generally considered solid masonry wall construction with outer brick and inner masonry wall layers, both having dimensions of more than 75mm.
The only combustible material is limited to plastic ventilation flues, installed within some of the penetrations of this external wall type which is considered to present an acceptable risk in terms of life safety.

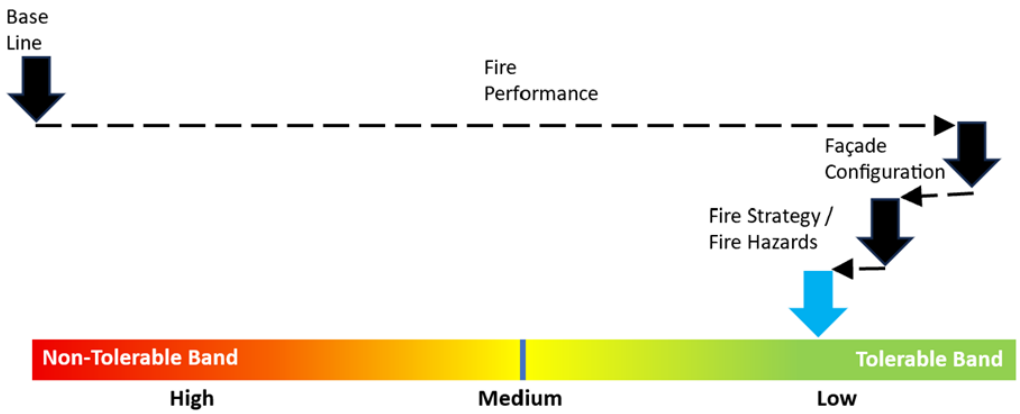
The terracotta tiles-clad infill panels, glazed into the curtain walling are entirely comprised of non-combustible materials and backing sheet, are installed to a limited extent as setbacks, and as such are not expected to have any detrimental impact on the overall fire safety of the external envelope.

12.5.1.3 Conclusion

Following the risk factors such as fire performance, façade configuration and fire strategy measures, as given in PAS 9980 guidance, the risk of external fire and smoke spread ought to be low due to lack of of any combustible materials within in the makeup of the external wall constructions. Therefore, EW-2 and its sub-type terracotta panels do not pose a detrimental risk of external fire spread.

Consequently, we have holistically assessed and proportionately concluded that no remedial action is required to EW-2

External Wall Type 2 Overall Fire Risk Rating	Low



12.5.2 Fire Performance Risk Factors (PAS9980 Annex K) for External Wall Type 2 - Masonry

1. K.1: General (Materials Calorific Value)	
This wall type consists of a solid masonry cavity wall construction with no cavities. The calorific value of the materials comprising this external wall are <3MJ/kg and are non-combustible.	Positive
K.2: External Surface Reaction to Fire Classification	
Euroclass A1 non-combustible brick, masonry, Portland / Marble stone and terra cotta finish.	Positive
K.3: Facing / Cladding	
Non-combustible facing with low heat release rate (HRR)	Positive
K.4:Panel Construction	
Brickwork or stone masonry with no gaps between the bricks, terra cotta is limited in extent and set back	Positive
K.5: Cavities & Cavity Barriers Provision	
This external wall system does not feature cavities as part of its construction. Cavities behind the terra cotta are not vertically or horizontally continue with no scope of breach of compartmentation.	Positive
K.6: Insulation	
Primarily solid masonry façade with no insulation. Terracotta cladding infills incorporate non-combustible Euroclass A1 insulation.	Positive
K.7: Substrate	
This external wall comprises solid masonry walls with thickness of at least 450mm	Positive
K:8: Sheathing Boards	
No sheathing boards are available to this EW Type	N/A
K.9: Insulated Core Panels	
Insulated core panels with A1-rated terracotta facings and non-combustible insulation	Positive
K.10: ETICS	
This EW type does not contain any ETICS	N/A
K.11: Infill / Spandrel Panels	Other
Infill panels are entirely comprised of non-combustible materials, such as Terracotta (clay) external facing, and metal backing combined with non-combustible mineral wool insulation.	Positive
K.12: Internal Finishes	
Inner plasterboard lining	Neutral
Overall Risk Rating in accordance with Annex K	**Low**

12.5.3 Facade Configuration Risk Factors (PAS9980 Annex N) for External Wall Type 2 - Masonry

N.1: Building Height	
The building height is below 18 meters but above 11 meters.	Neutral
N.2: Height of The Cladding Base from Ground Floor Level	
This external wall type is entirely comprised of non-combustible masonry, therefore ignition of EW-2 externally is highly unlikely.	Positive
N.3: Extent of Cladding	
Limited in extent such as to delay fire spread over the external walls	Neutral
N.4: Cavities	
No cavities are present to this External Wall type.	Positive
N.5: Infill / Spandrel Panels	
Adjacent to, but not in a vertical continuous line with, windows	Neutral
N.6: Setbacks	Other
Infill panels are sufficiently set back from the main building elevations, and furthermore do not contain any combustible materials.	Positive
N.7: Overhangs and Projections	
This external wall type does not feature any overhangs and/or projections	N/A
N.8: Proximity to Window and Other Openings to The Accommodation	
Horizontally adjacent to windows, and vertically in line with such openings. However, EW-1 is comprised fully of materials that do not contribute to combustion	Neutral
N.9: Presence of Vents or Other Openings for Services In The Façade	
Vents pass through the cavity, however, the cavity is not a medium for fire spread.	Positive
N:10 Proximity of Combustible Elements of a Façade to Escape Route Window and Other Openings	Other
There are no combustible materials in proximity to either of the escape routes windows, or any other openings.	Positive
N.11: Attachments	
The building features non-combustible open balconies	Positive
N.12: Proximity of Combustible Elements of a Façade Neighbouring Building	
Windows or other openings in adjacent or abutting neighbouring buildings that are sufficiently close that direct flame impingement from a fire in the neighbouring building is foreseeable	Negative
Overall Risk Rating in accordance with Annex N	**Medium**

Section 13. EWS1

13.1 EWS1 Form Provision

13.1.1 The provision of an EWS1 form was requested as part of our instructions. Following this FRAEW, a holistic assessment has been undertaken in line with PAS9980, and it has been reasonably concluded that a RICS EWS1 Certificate ought to fall into the A1 rating category.

13.2 EWS1 Form Rating

A1

13.2.1 The EWS1 Certificate with a A1 rating is referred to as Option A. Option A is for buildings where the external façade materials are unlikely to support combustion. Option A1 means the assessor has concluded in his view that there are no remedial works required to the external facades.

Section 14. Recommendations & Actions

14.1 General Assessment

14.1.1 Based on our intrusive façade investigation and having reviewed the fire safety measures in place externally and internally, the overall risk of fire spread relating to the external walls has been holistically assessed whether any remedial works required. This judgement has been made when considering the benchmark criteria and risk factors provided within the PAS9980 document as it assesses the overall level of fire life safety risk relating to external walls.

14.1.2 Our overall risk assessment has initiated with the High risk as the base line and gradually dropped to the relevant risk band when considering the benchmark criteria and risk factors provided within the PAS9980 document as it assesses the overall level of fire life safety risk relating to the external walls.

14.1.3 Following the risk factors such as fire performance, façade configuration and fire strategy measures, as given in PAS 9980 guidance, the overall risk of external fire spread risk in relation to EW Types 1 & 2 has been assessed as **"Low"**

14.1.4 Based on the **"Low"** risk outcome above, it was concluded that unduly rapid external fire spread was not anticipated, but, in any case:

→ it was unlikely that occupants would be unduly harmed from secondary fires before escaping or prevented from escaping; and
→ it was unlikely that the communal means of escape would be compromised before occupants could safely use them to escape.

14.1.5 Accordingly, no remedial action is considered necessary for EW Types 1 & 2 following the PAS9980 methodology.

14.2 Evacuation Policy & Interim Measures

14.2.1 Evacuation Policy

A stay-put evacuation strategy is currently in place. This policy heavily relies on effective compartmentation. The FRA and our visual inspection have noticed inadequacies with the internal compartmentation. These include defective self-closing door mechanisms, excessive gaps around the doors and insufficient fire stopping around services that span across multiple compartment lines within the service risers. For the purposes of this FRAEW, deficiencies identified in FRA or compartmentation survey are expected to be rectified and are not considered. Any defects relating to internal compartmentation must be investigated and remediated

14.2.2 No interim measures are recommended in this FRAEW. However, this FRAEW report must be made available to the Fire Risk Assessor who then can ensure that the level of risk to life safety presented by the external wall construction has been assessed in the context of the risks presented by the whole building. It is crucial that the fire risk assessor considers the findings and outcome included in this PAS 9980 / FRAEW.

14.2.3 In accordance with best practices for fire safety management and regulatory compliance, it is recommended that the Fire Risk Assessment (FRA) for this block be renewed. The most recent FRA was conducted in 2021, and as per industry standards, regular reviews, particularly for high rise buildings, are essential to ensure that fire safety measures remain effective and up to date.

It is strongly advised that the renewal of the Fire Risk Assessment be scheduled at the earliest opportunity to maintain a robust fire safety regime and to fulfil statutory obligations

Section 15. FIRE RISK APPRAISAL OF EXTERNAL WALL (FRAEW) LEGISLATIVE CONTEXT & PAS 9980

15.1 Introduction & Background PAS 9980: 2022

15.1.1 This section of this report provides a summary of the core principals of PAS 9980 and outlines how PAS 9980 and the FRAEW process dovetails with other key areas of statute.

15.1.2 PAS 9980 is a code of practice and was introduced to drive a change in how the assessments of external wall systems are carried out. In essence, PAS 9980 provides a clearer and more proportional and holistic guidance to assessing risks associated with external wall systems, specifically in respect of the risk of fire spread via external wall construction. It sets out a methodology for performing a risk-based assessment to determine the requirement for any remedial works to protect the life safety of the building occupants.

15.1.3 PAS 9980 brought with it the adoption of the FRAEW. The FRAEW for a multi-occupied building is the process by which the external wall system is appraised and risk assessed, all in line with the framework and methodology outlined in PAS 9980. The FRAEW will be used to directly inform the fire risk assessment (FRA) which is a statutory requirement under the Regulatory (Fire Safety) Order 2005.

15.1.4 The purpose of a FRAEW is to review and analyse in detail the risk of fire ignition and propagation over the external walls of a building or from the external walls into the building. This determines the level of safety for the occupants of the building.

15.1.5 A FRAEW is only deemed necessary where there is a risk suspected or known from the composition of the external walls. For example, where combustible materials exist. Where an FRAEW is considered necessary, PAS9980 is intended to provide recommendations and guidance tailored to the particular risk posed by fire spread over external walls, and to provide tools for a competent person to carry out the FRAEW.

15.1.6 The outcome of a FRAEW is to provide an opinion on whether a building requires remediation, temporary mitigation measures or no actions at all. The provision of an FRAEW is therefore now a critical element of the overall fire risk assessment process for multi-occupied buildings.

15.1.7 The scope of PAS 9980 this document covers residential buildings, including flats, student accommodation sheltered housing, specialised housing, buildings converted to flats and flats in mixed use buildings. Therefore, the building falls within the scope of the PAS 9980.

15.2 The Regulatory (Fire Safety) Order 2005 & The Fire Safety Act 2021

15.2.1 The Regulatory Reform (Fire Safety) Order 2005 ("the Order") came into force in October 2006. It applies to all non-domestic premises in England and Wales. The Order sets out the duties of the person responsible for premises (known in the Order as the "responsible person"). The responsible person is required to carry out a suitable and sufficient fire risk assessment (FRA) and then implement the necessary fire precautions and management procedures.

15.2.2 The Order is the primary legislation that requires the responsible person / entity (usually and freeholder or landlord), to maintain the fire safety standards of a premises once in use. This includes the undertaking of regular fire risk assessment (FRA) of their premises, which then enables appropriate fire safety provisions to be put in place and maintained.

15.2.3 The Fire Safety Act 2021 came into force in May 2022. The Fire Safety Act is supplementary to the Order and has had the effect of providing additional provisions for the application of the Order to residential buildings.

15.2.4 Under the 2021 Act the application of the Order extends to the building's structure, common parts, external walls, including doors/windows, balconies and attachments as well as doors between domestic premises and common parts.

15.2.5 The Order, The Fire Safety Act and PAS 9980 are all related and interconnected strands to ensuring that a buildings such as this meet the required fire safety standards.

Section 16. SCOPE, LIMITATIONS & METHODOLOGY

16.1 Scope

16.1.1 The scope of this report is limited to the known / accessible external wall systems and any associated building attachments only, and is in line with the Harris Associates methodology and reporting framework as set out within Harris Associates services proposal and instructing documentation. All other areas including tenants demised areas are excluded from this report and investigation.

16.1.2 The external wall system(s) survey and investigation process is intended to provide indicative evidence as to the composition and the materials used within the external façade(s). Where relevant, an assessment of building attachments such as balconies has been made to assist with the assessment and evaluation of potential risks relating specifically to external fire spread across the external wall(s).

16.1.3 The collective result of the investigations carried out is intended to assess whether, in the specific circumstances of the building, remediation or other mitigating measures to address any highlighted associated external wall system risks, are considered necessary. Statements regarding the fire resistance of the external façade(s) and external wall system(s) have been based on our own investigations and typical expected resistances of materials and construction.

16.1.4 No testing, accurate measurements or any calculations were carried out as part of this FRAEW process. Any measurements referred to in this report will be approximate only.

16.1.5 Where appropriate, a further fire risk assessment (FRA) which includes consideration of the findings of this FRAEW and report may also be required to provide a wider holistic determination of potential fire safety risks. Such a FRA may be required to establish strategies to mitigate, manage or remove risks. Where this is recommended, Harris Associates will advise the responsible entity / instructing entity.

16.1.6 The external wall systems survey and our investigations although thorough cannot be considered wholly and completely conclusive, due to the extent of those investigations which by their nature are restricted to representative sampling. Where we consider further investigation are required, specific reference to this will be made in this report. This report has where reasonable feasible to do so, commented on the condition, quality, and competency of installations to external wall system(s) and their component on risk-based approach.

16.1.7 Where structure and façade elements were concealed by cladding and other coverings, the assessment was based on experience of similar buildings and construction. Where necessary, we may recommend further investigation for such items. If significant issues with the façade design beyond the scope of work have been identified, then the analysis of these defects will fall outside the scope of this commission, we will however provide comments based on our visual assessment of the issues.

16.2 Limitations

16.2.1 As detailed within PAS 9980, this FRAEW has limitations, and the instructing / responsible entity has accepted said inherent limitations, which for the avoidance of doubt are summarised below:

16.2.2 This FRAEW and report are intended primarily to inform the subject building's fire risk assessment (FRA). The provision of any potential FRA falls outside the scope of this FRAEW and report.

16.2.3 This FRAEW and report cannot warrant absolute safety, as it will be risk-based and therefore reliant on professional judgement by competent persons.

16.2.4 It might not be possible to identify the full scope of work needed as part of the FRAEW process, as the conclusion(s) might be that further inspection or in-depth technical assessment, testing etc, is needed (which might necessitate the involvement of other professionals).

16.2.5 This FRAEW report is not specifically intended to address protection of firefighters.

16.2.6 This FRAEW report is not intended to address property protection.

16.2.7 This FRAEW report is not intended to deal with any additional insurance related requirements including specific building insurance requirements.

16.2.8 This FRAEW and report can only be based on available industry knowledge at the time of the FRAEW and more definitive information on the fire performance of external wall construction might come to light subsequently.

16.2.9 This FRAEW and report is not intended to address business continuity.

16.2.10 This FRAEW and report excludes matters pertaining to any assessment on the structural stability of the building.

16.2.11 Harris Associates has provided this report based upon information gained through documents sighted and provided by the responsible entity / instructing party, and our own investigations. The advice in this FRAEW and report is therefore given in good faith and is based upon the evidence seen, the information provided at the time and the points discussed at the time of the visits and prior to the issuance of this report.

16.2.12 Whilst every care is taken to interpret the Acts, Regulations and Approved Codes of Practice, these can only be authoritatively interpreted by Courts of Law.

16.2.13 No guarantee can be given that during any subsequent visit by inspectors with statutory powers other non-compliance may not be found. Harris Associates will not accept responsibility for any loss arising from such a discovery.

16.2.14 Any client information which is of a confidential or sensitive nature will be treated in the strictest confidence by Harris Associates and will not be communicated or otherwise transmitted to a third party unless expressly authorised to do so by the responsible entity / instructing entity.

16.3 Methodology

16.3.1 The PAS 9980 publication provides a structured approach to follow to effectively complete an FRAEW. The methodology that has been followed in respect of this assessment meets the requirements of PAS 9980.

16.3.2 Prior to the completion of the FRAEW the following criteria was considered.

→ The anticipated performance of the external wall, given the known components / materials used and the configuration of the external wall build-up.

→ The likelihood of fire propagation, given the location of the external wall build-up and the location and extent of the cladding / façade(s).

→ The ability of a potential fire to impact the occupants of the building and their ability to escape, either directly or indirectly; such considerations to be given to the fire safety design of the building, means of escape provision(s) and strategy, fire detection and alarm system provision and proximity of the fire and rescue service.

16.3.3 The methodology adopted by Harris Associates is summarised below:

(i) Harris Stage 1 (PAS 9980 Stage 1) Documentation Assessment, including initial desktop assessments of available / provided documentation to include FRA, operation & maintenance information, any test data etc. A decision is made in the context of whether an FRAEW is required.

(ii) Harris Stage 2 (PAS 9980 Stage 2) Orientation, Site Access Assessment & Method Statements, including a remote assessment to plan extent of the investigations. If required a preliminary site visit may be carried out. Risk assessment / methodologies are provided ahead of the investigations.

(iii) Harris Stage 3 (PAS 9980 Stage 2 & 3) Intrusive Investigations & Data Collection, including detailed site investigations, which can include removal of external elements, use of borescopes, opening up (externally and in some circumstances internally), thus allowing a determination and validation of the as built / existing construction arrangements / compositions of the façade(s), building attachments etc.

(iv) Harris Stage 4 (PAS 9980 Stage 3 & 4) Fire Risk Appraisal of External Wall(s): All data is reviewed and appraised and the framework and guidance contained within PAS 9980 applied to the subject building. The purpose of the FRAEW is to provide a formal understanding of the external wall systems / construction / fire safety arrangements and to provide formal due diligence advice in determining the risks posed.

(v) Harris Stage 5 (PAS 9980 Stage 4 & 5) Review & Report Publication to include a review of data and FRAEW report internally. Once the FRAEW report has been reviewed and signed off, the FRAEW report is issued directly to the responsible entity / instructing entity.

17. Appendicies

APPENDIX A: Professional Indemnity Insurance Certificate

TURNER RAWLINSON

Jubilee House, Townsend Lane, Kingsbury, NW9 8TZ
020 8450 5336 | enquiries@turnerrawlinson.co.uk | www.turnerrawlinson.co.uk

15th August 2024

Mr S Harris
S Harris Associates Ltd t/a Harris Associates
Colonial Buildings,
59-61 Hatton Garden,
London, EC1N 8LS

Our Reference: 62197737

Dear Mr Harris,

RE: Professional Indemnity Insurance (RICS Approved)
2nd August 2024 — S Harris Associates Ltd

As requested we have provided this cover letter for forwarding on to any relevant and interested parties requiring evidence of the cover now in place.

We can confirm that we act as insurance brokers on behalf of the above insured, and that the following cover is in place:

Professional Indemnity

Insurer:	AXA Insurance UK Plc
Policy number:	AB CPI 4645693
Cover period:	3rd August 2024 to 2nd August 2025
Indemnity limit:	£5,000,000 Any One / Each & Every Claim
Excess:	£25,000

Please Note:
The information provided in this document provides a brief overview of cover in place at the time this was sent. The full details of the above policy, including terms and conditions, are provided in their respective policy documentation. The expiry date given represents the normal expiry date of the policy. This document does not change cover provided. The cover stated above may change or be cancelled, and we are under no obligation to advise you as such.

Please contact us if you require any further information.

Yours faithfully,

Gary Field
Director
PSC UK Insurance Brokers Ltd
Tel: 0208 208 7092
Email: garyf@turnerrawlinson.co.uk

Turner Rawlinson is a trading name of PSC UK Insurance Brokers Limited
Authorised and Regulated by the Financial Conduct Authority no. 457721
Registered in England & Wales no. 04338485 and Registered Office: 75 King William Street, London, EC4N 7BE

Media summary

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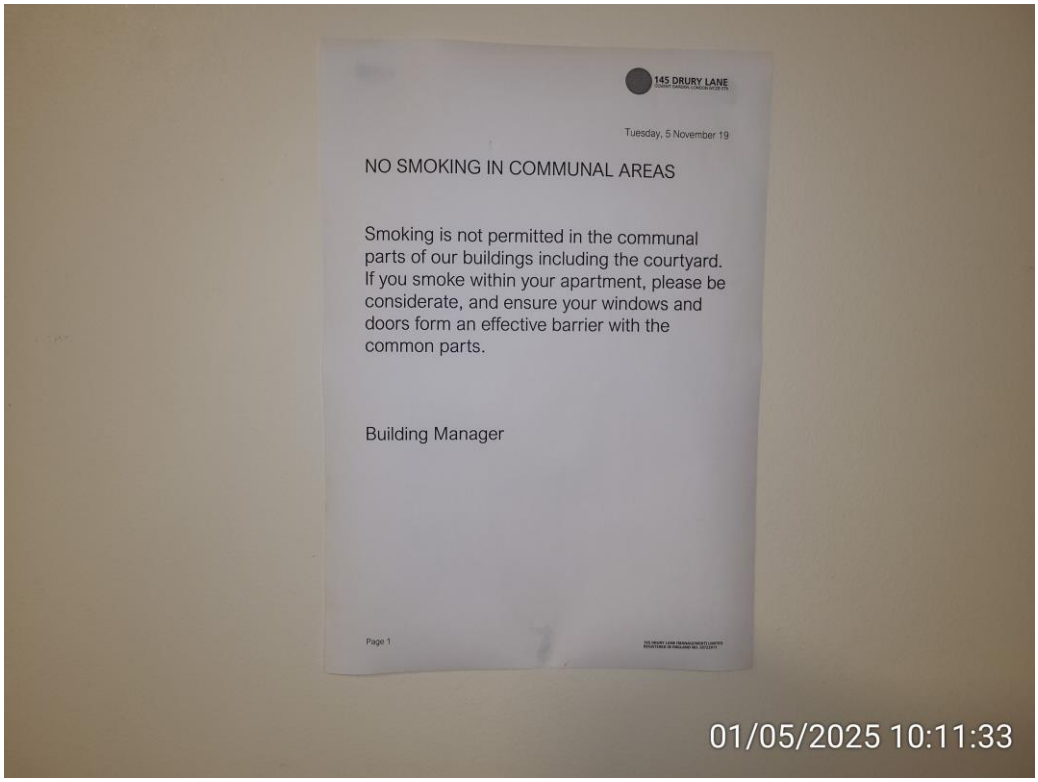

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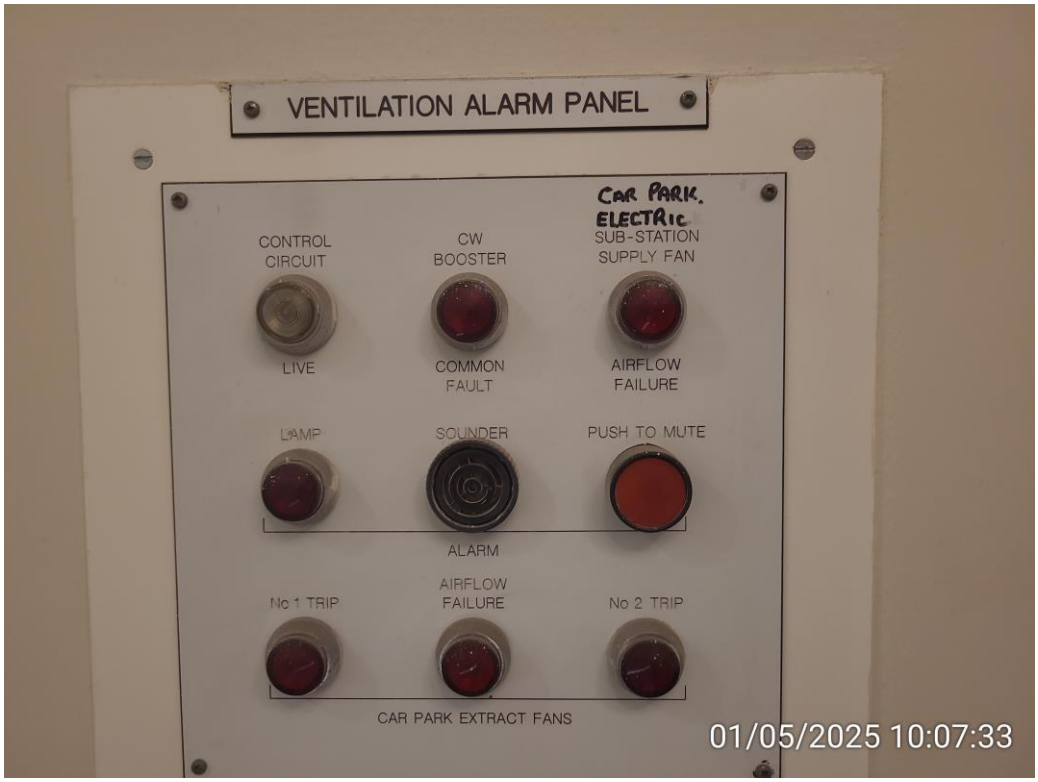

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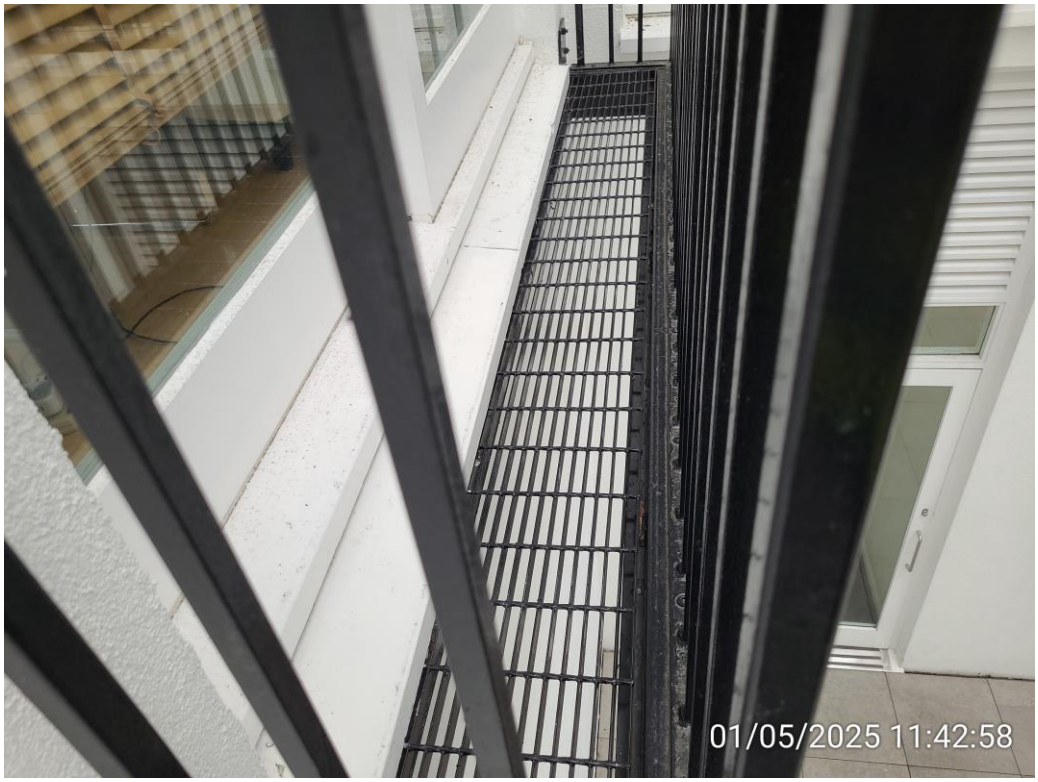

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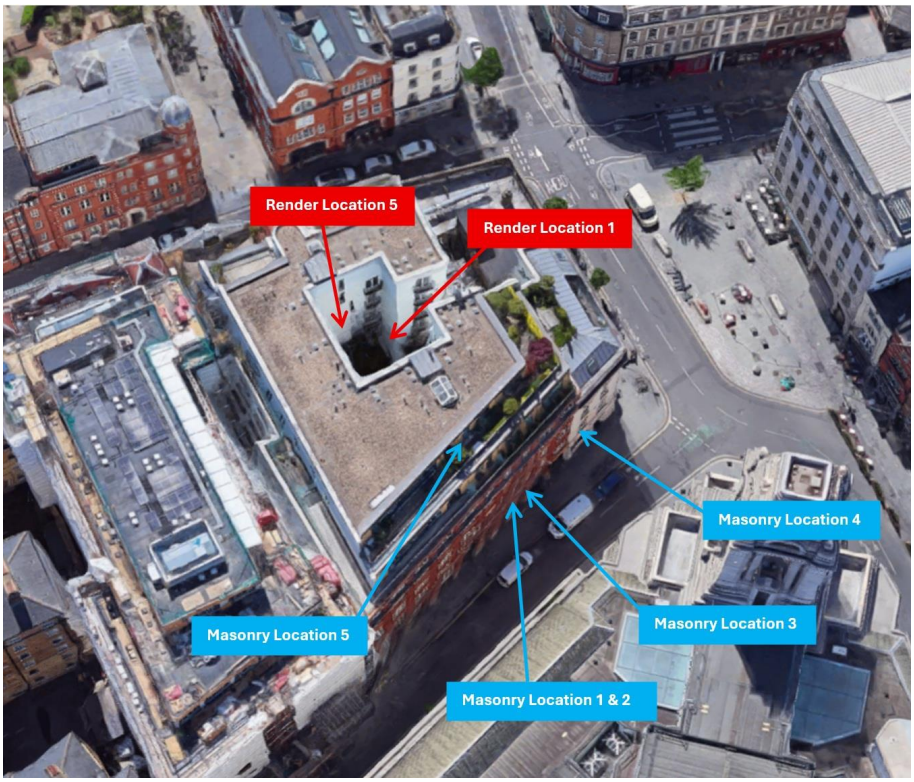

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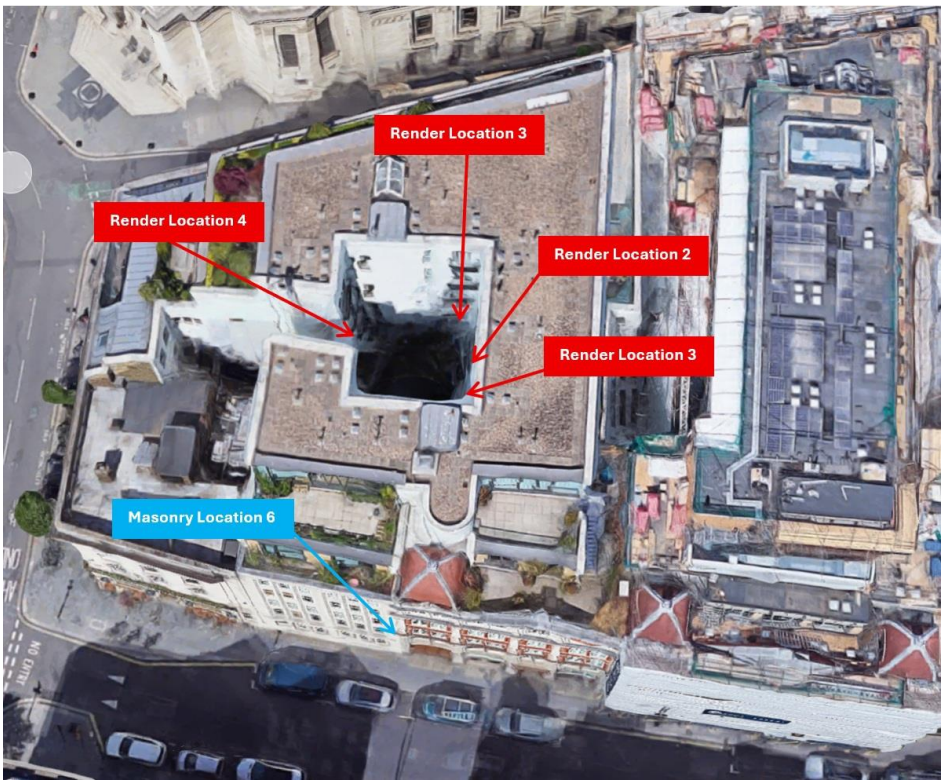

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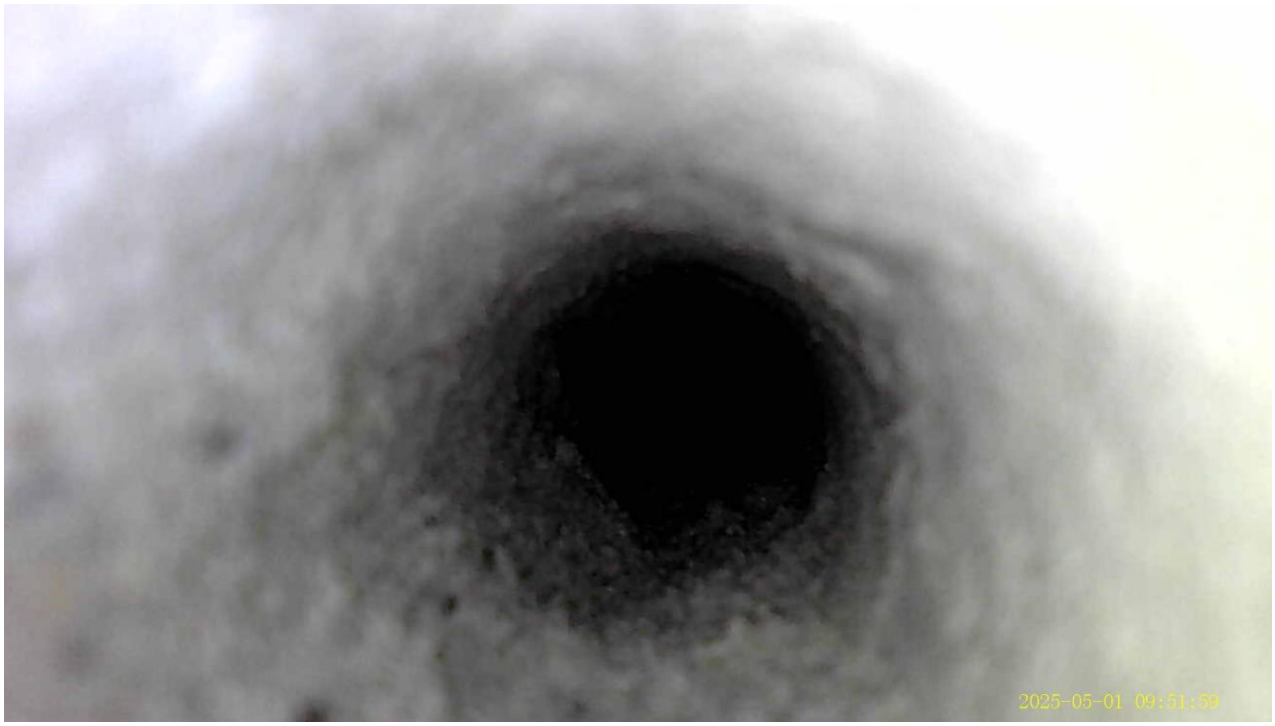

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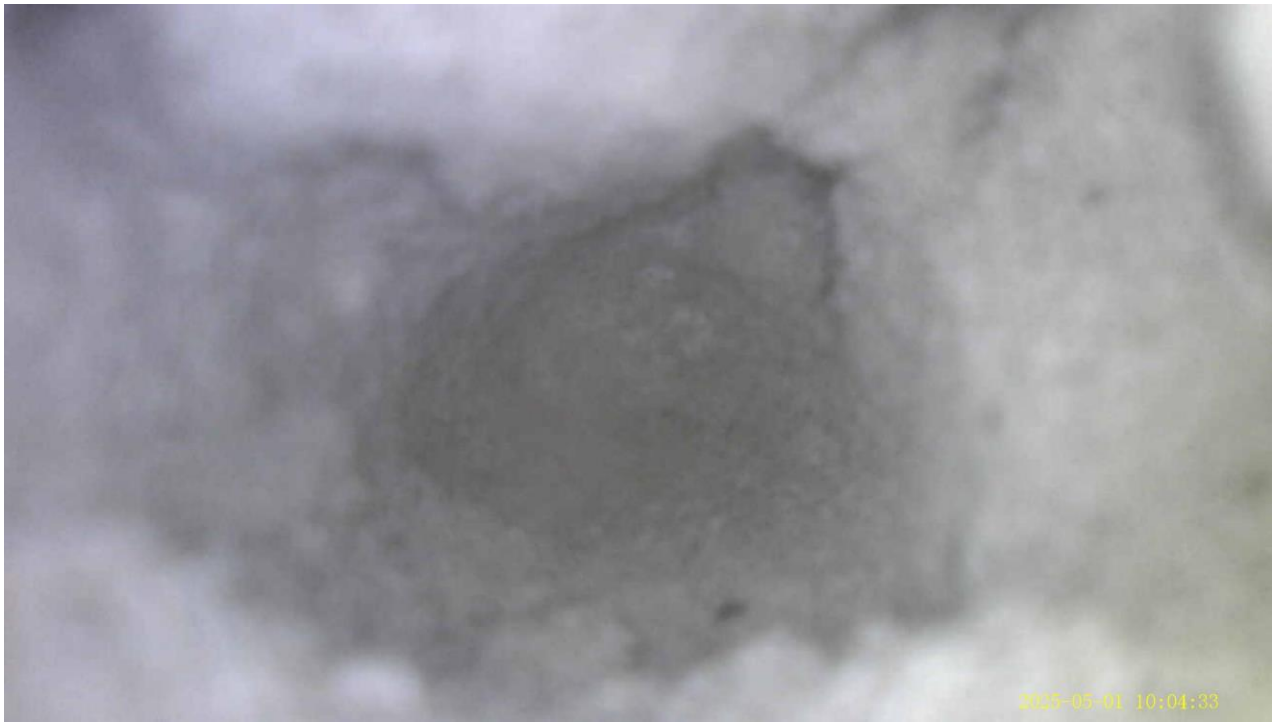

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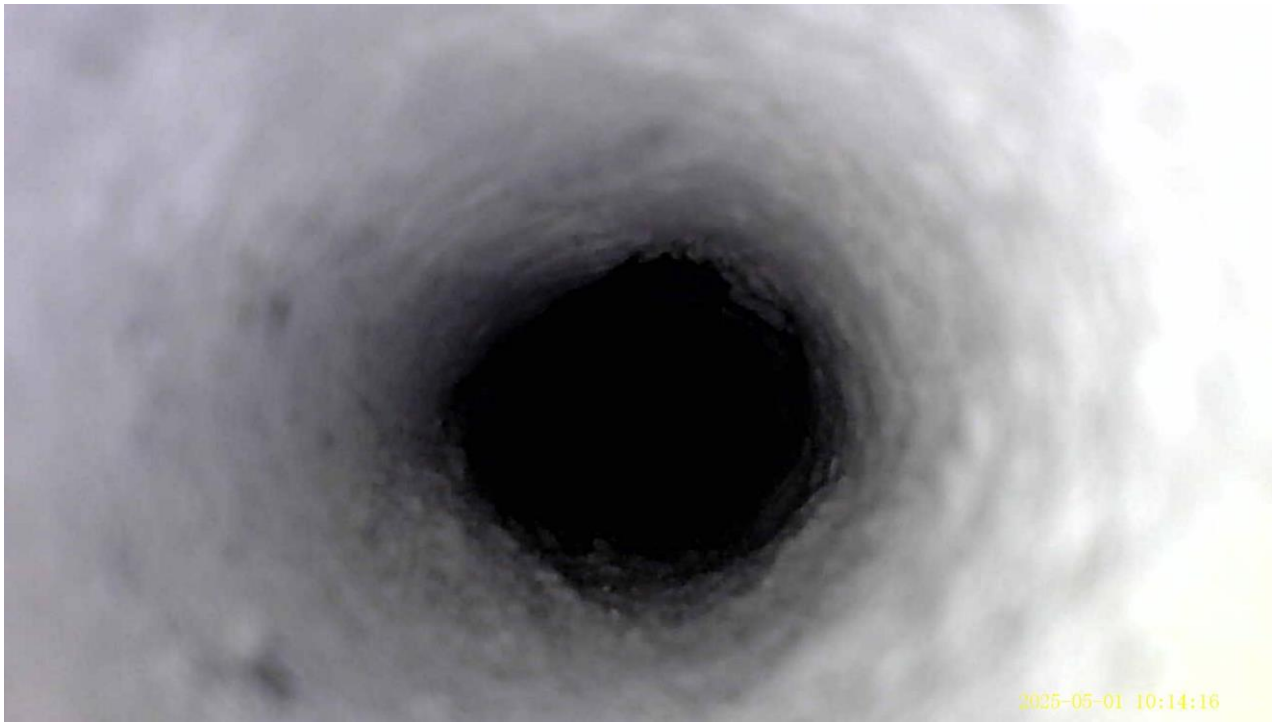

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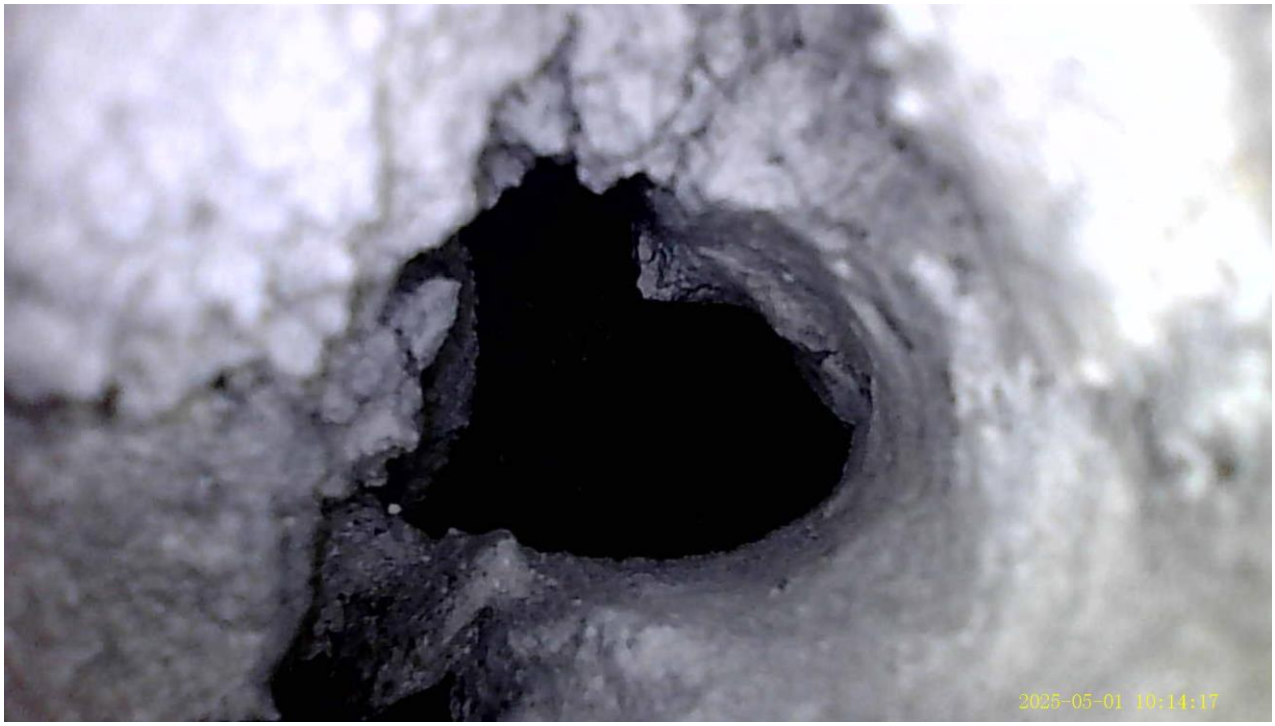

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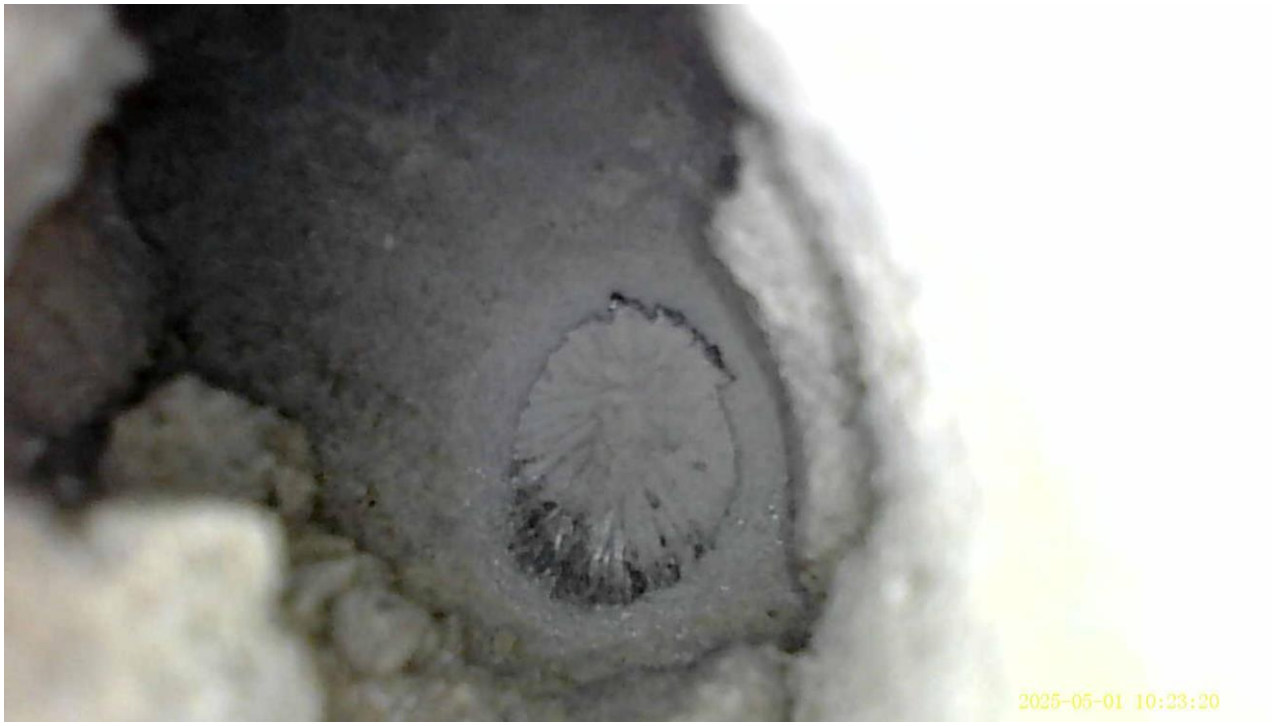

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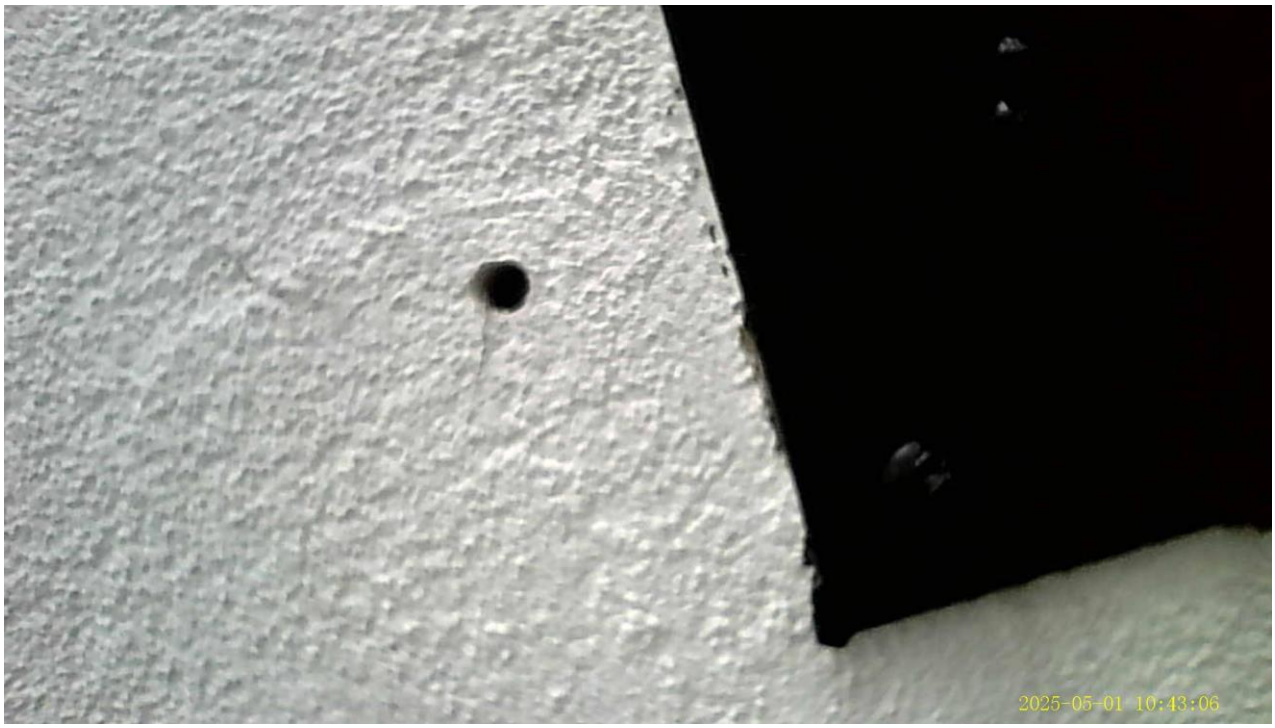

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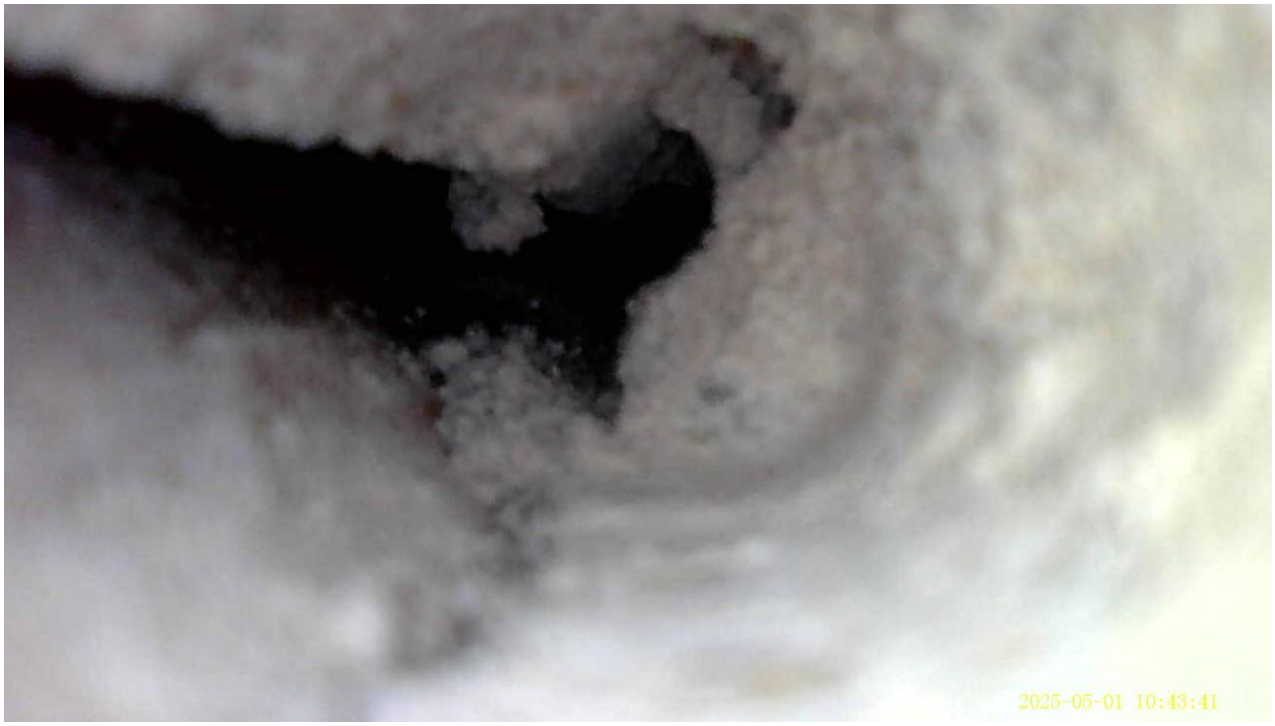

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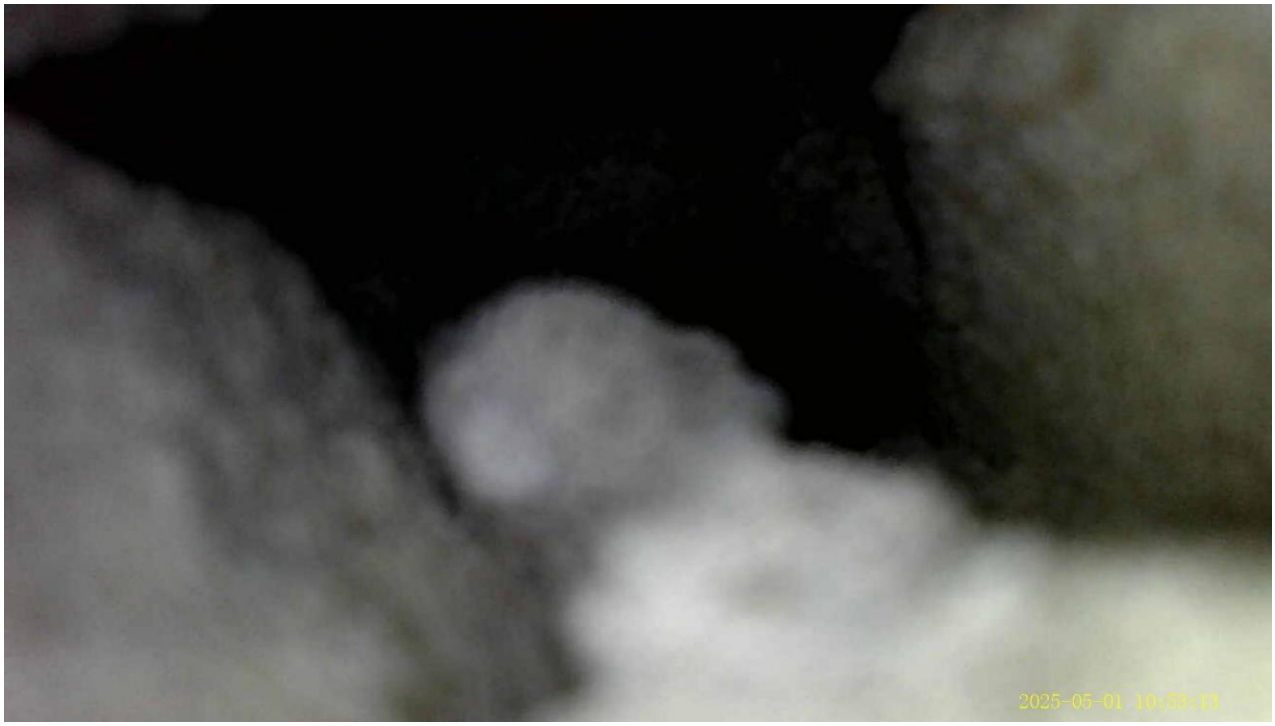

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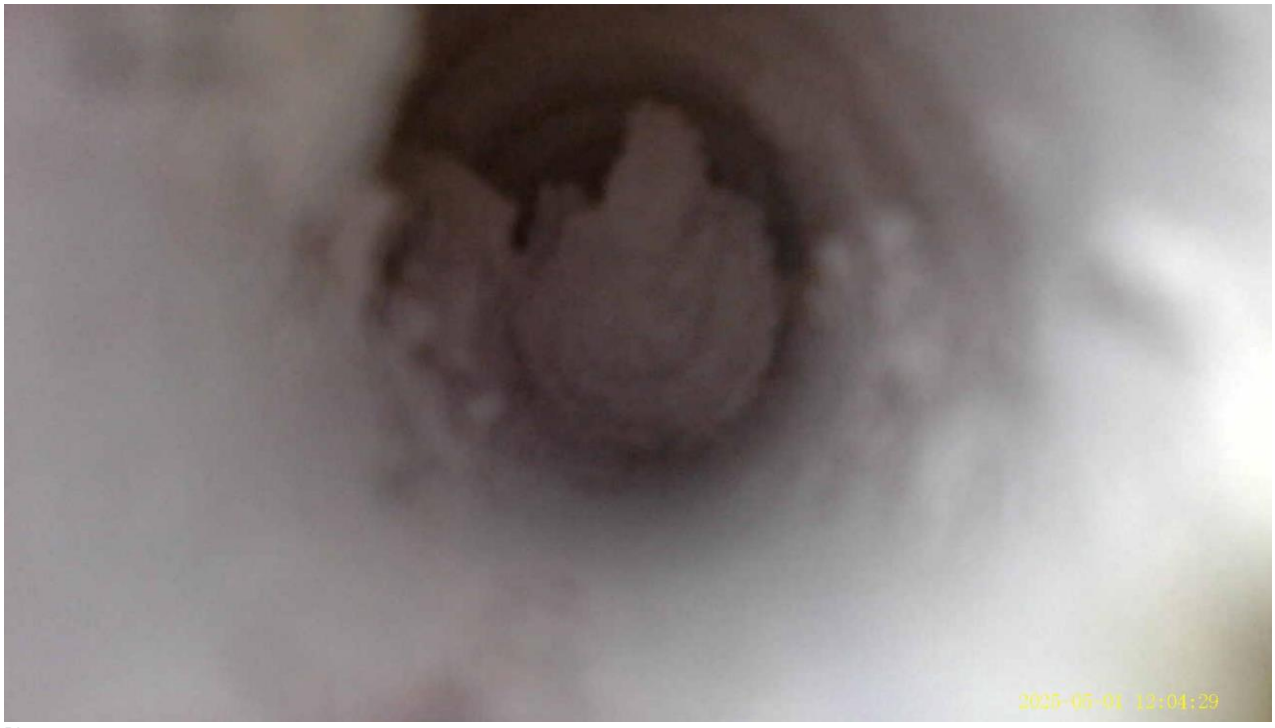

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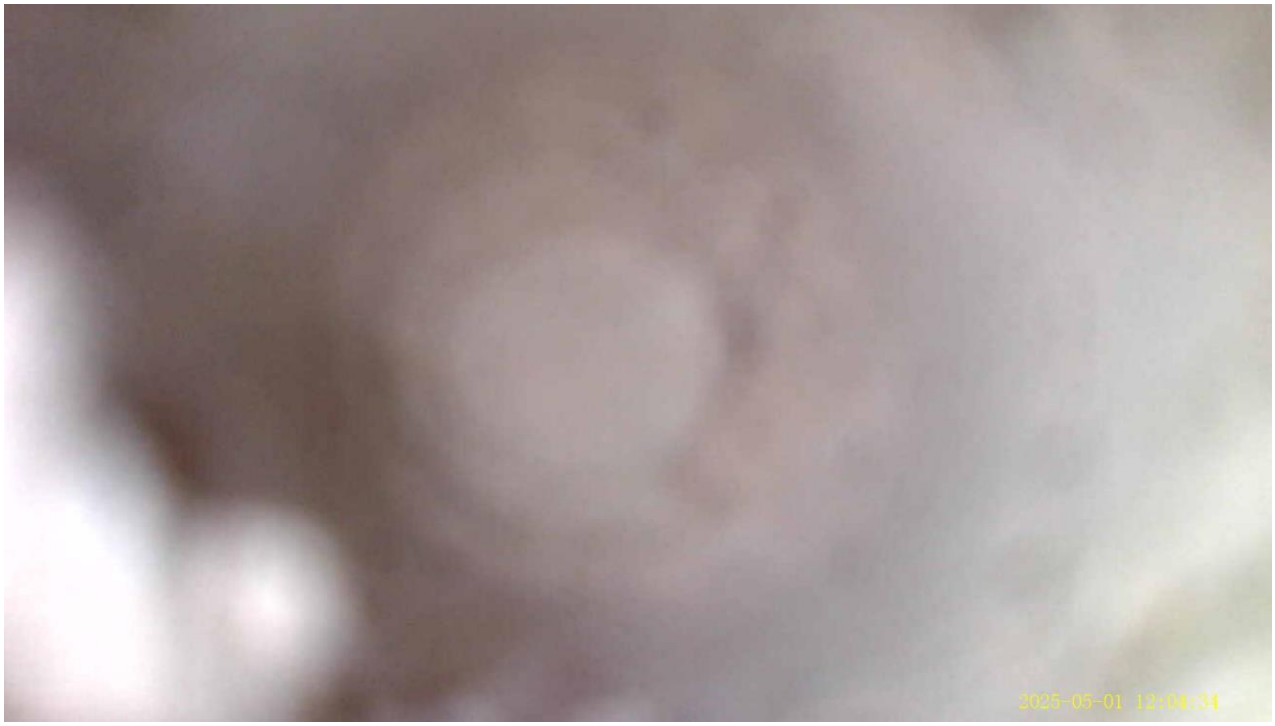

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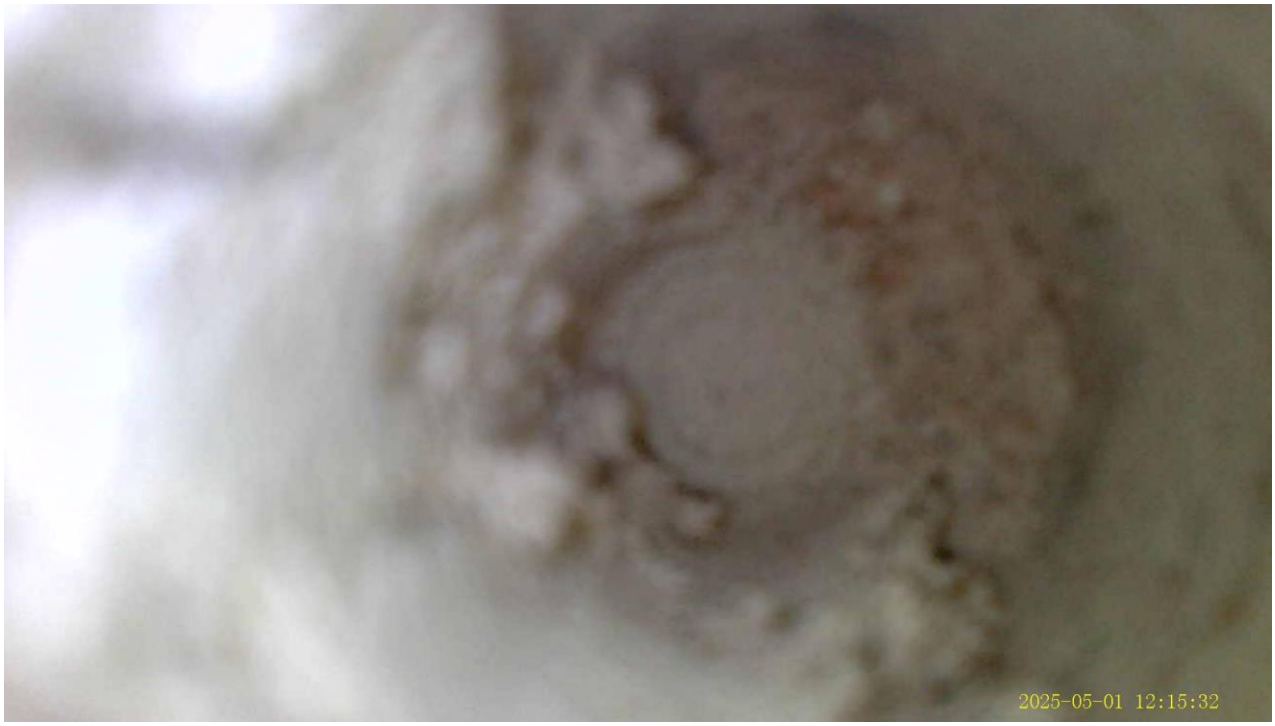

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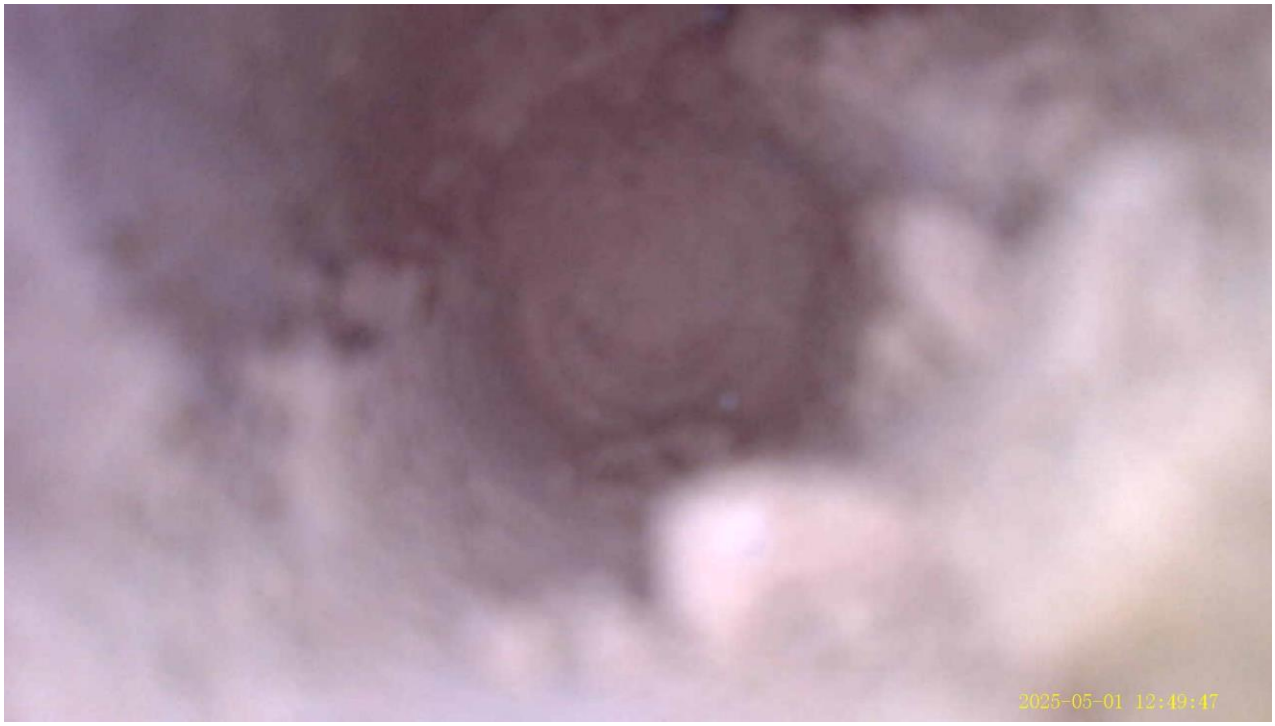

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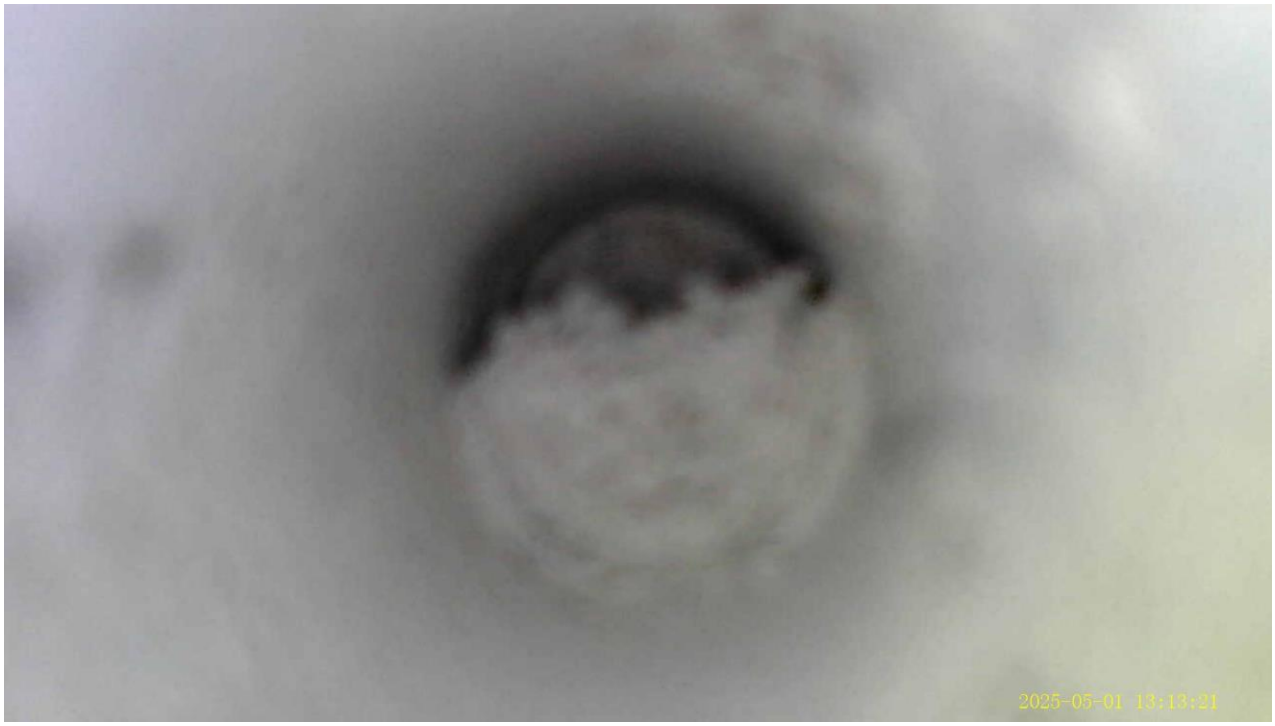

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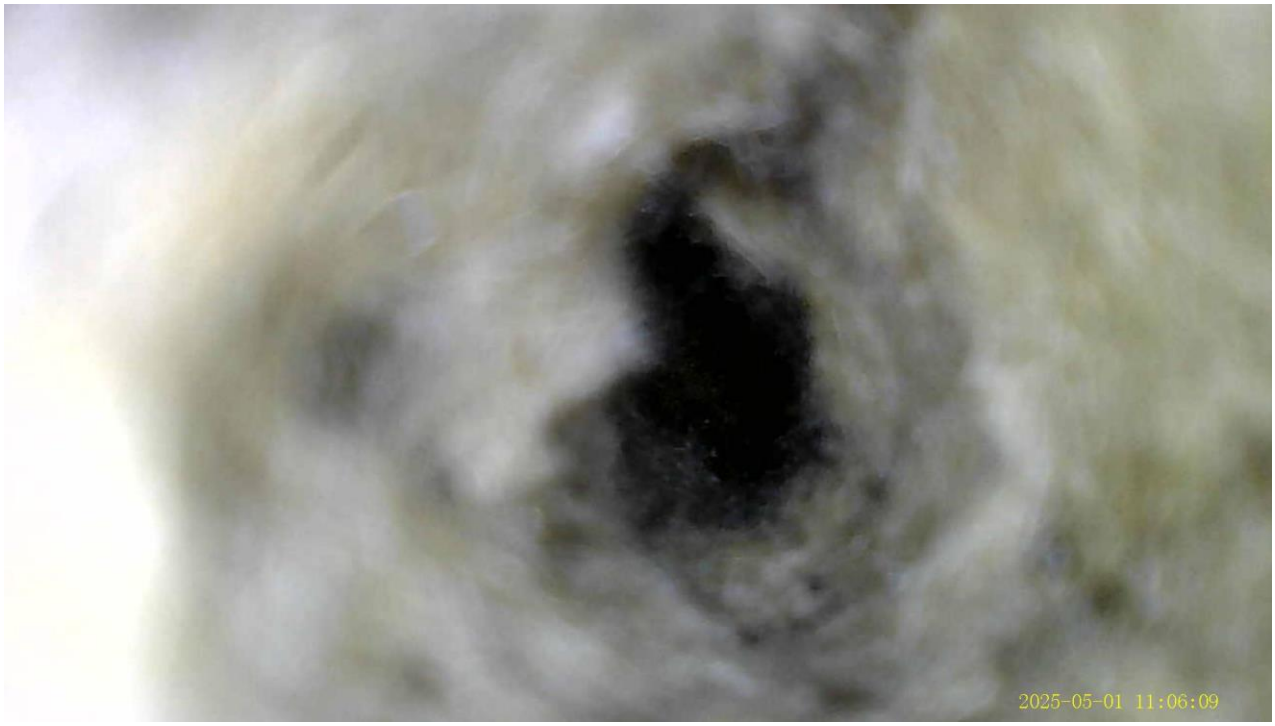

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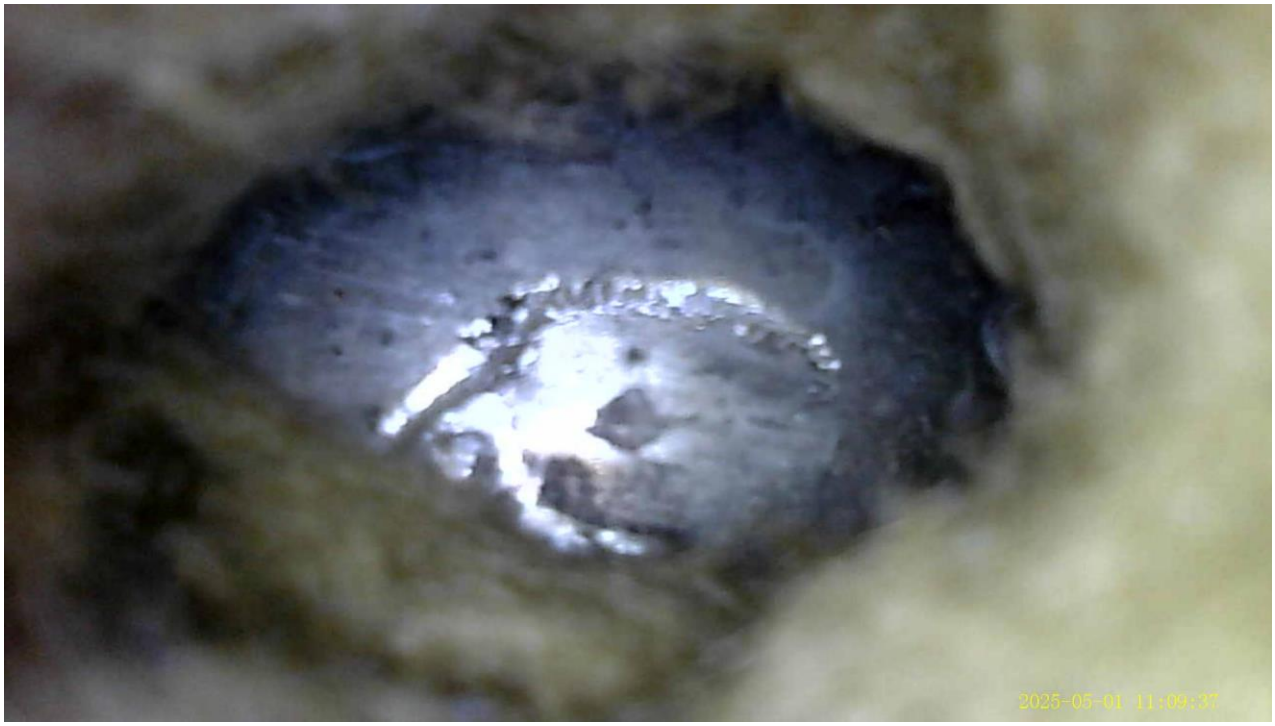

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