

# Fire Strategy

(June 2026)

For the proposed redevelopment to provide  
**32 residential flats**  
37 Albion Street, Southwick,

Prepared by PR Homes Direct Ltd

## Document Control

| Revision | Date      | Description                                                                                                     |
|----------|-----------|-----------------------------------------------------------------------------------------------------------------|
| Draft 1  | June 2026 | Planning-stage fire strategy for the proposed 32 residential flats at 37 Albion Street, Southwick, West Sussex. |

### Status of this document

This is a **planning-stage fire strategy**. It sets out the fire-safety design principles, assumptions and benchmark provisions for the proposed development so that the fire-safety implications of the scheme can be understood and tested at the determination stage. It does not replace the detailed Building Regulations Approved Document B fire strategy, which will be developed and finalised at Building Regulations / construction stage.

The standard provisions in this strategy are drawn from the Building Regulations 2010, Approved Document B, Volume 1 (Dwellings). The **building-specific inputs** — confirmed height and storey count, stair configuration, floor-by-floor layout, travel distances, construction and external-wall build-up, and the architect's drawing references — are flagged throughout and must be confirmed against the architect's drawings before submission.

## Contents

|                                                              |    |
|--------------------------------------------------------------|----|
| Document Control .....                                       | 2  |
| Contents.....                                                | 3  |
| 1 Introduction .....                                         | 4  |
| 2 Building description.....                                  | 5  |
| 3 Derogations from the benchmark standard.....               | 5  |
| 4 Means of escape.....                                       | 6  |
| 5 Automatic fire suppression .....                           | 7  |
| 6 Detection and alarm.....                                   | 7  |
| 7 Emergency lighting and signage .....                       | 8  |
| 8 Internal fire spread (linings) .....                       | 9  |
| 9 Internal fire spread (structure) .....                     | 9  |
| 10 External fire spread.....                                 | 11 |
| 11 Access and facilities for the fire service .....          | 11 |
| 12 Provision of portable firefighting equipment.....         | 11 |
| 13 Fire-safety management and the regulatory framework ..... | 12 |
| Outstanding items to confirm before submission .....         | 1  |

# 1 Introduction

This statement is produced in support of a planning application for the redevelopment of 37 Albion Street, Southwick, West Sussex, to provide 32 residential flats. The application is made on behalf of PR Homes Direct Ltd. The site lies within the Shoreham Harbour Regeneration Area in the district of Adur.

The proposal involves the demolition of the existing building — currently in sui generis use as car sales and repair premises — and the erection of a purpose-built block of flats. As a new building, the development will be designed to comply in full with the relevant fire-safety provisions; it is not constrained by the limitations of an existing structure.

The proposed accommodation comprises 32 flats: 5 one-bedroom, 23 two-bedroom and 4 three-bedroom units.

Regulation 38 of the Building Regulations requires that, where building work is carried out that affects fire safety and the building will be covered by the Regulatory Reform (Fire Safety) Order 2005, sufficient information is provided to enable the building to be operated and maintained in reasonable safety. This strategy is intended to assist the eventual owner, occupier and responsible person in meeting their statutory duties under that Order and under the Fire Safety (England) Regulations 2022.

## 1.1 Design benchmark standard

The design benchmark standard for this building is the Building Regulations 2010, Approved Document B (Fire Safety), Volume 1 — Dwellings, 2019 edition incorporating the 2020, 2022 and 2025 amendments, for use in England. Where paragraph numbers are quoted, these refer to that document unless otherwise stated.

Given the scale and form of the building (a multi-storey block of flats with multiple dwellings per storey), the smoke-control and means-of-escape design may alternatively be developed in accordance with **BS 9991:2024** (“Fire safety in the design, management and use of residential buildings — Code of practice”), which is an established route for demonstrating compliance for buildings of this type.

## 1.2 Materials and workmanship

All building work subject to the requirements of Schedule 1 of the Building Regulations will, in accordance with Regulation 7, be carried out using proper materials and in a workmanlike manner. It is incumbent on the developer and any sub-contractors to ensure that this is the case, in particular in respect of compartmentation, fire-stopping and the installation and certification of fire-protection systems.

## 1.3 Drawings

This strategy is to be read in conjunction with the architect’s drawings. For the purposes of the planning submission the relevant scheme drawings are those referenced in the Planning, Design and Access Statement (including drawings 3471\_05B, 3471\_14 and 3471\_18B).

## 1.4 Planning context and the status of this strategy

At planning stage, a statutory **Fire Statement** (in the form prescribed by the Town and Country Planning (Development Management Procedure) (England) Order, as amended) is required only for applications relating to a “relevant building” — a building containing two or more

dwelling that is 18 metres or more in height, or 7 or more storeys. Where the prescribed Fire Statement is required, the **Building Safety Regulator** becomes a statutory consultee on the application.

On the basis of the scheme as currently understood, the proposed building has a top storey **more than 11 metres but less than 18 metres** above ground level and **fewer than seven storeys**. On that basis:

- a) the building is **not** a “relevant building” / higher-risk building, so the statutory planning Fire Statement is not mandatory and the Building Safety Regulator is not a statutory consultee;
- b) the higher-risk building regime under the Building Safety Act 2022 (which applies to buildings of at least 18m or 7 storeys) is not engaged; and
- c) the ban on combustible materials in external walls under Regulation 7(2) of the Building Regulations (which applies to relevant buildings of 18m or more) is not engaged — although best-practice external-wall provisions are nonetheless adopted (see Section 10).

Notwithstanding that the statutory Fire Statement is not triggered, this strategy is provided to demonstrate that fire safety has been properly considered as an integral part of the design, consistent with the expectations of the National Planning Policy Framework. It addresses the planning-relevant fire-safety matters set out in the prescribed Fire Statement — site layout, fire-service access, water supply and the principles of the fire-safety approach — within the fuller technical framework below.

## 2 Building description

The proposed building is a new, purpose-built block of flats providing 32 dwellings on a brownfield site. The use is **Purpose Group 1(a) “Flats”** (Approved Document B, Table 0.1).

- Number of storeys above ground level, and any storeys below ground level (basement / undercroft parking).
- Height of the top occupied storey above ground level (metres), measured in accordance with Diagram D6 of Approved Document B (excluding roof-top plant).
- The floor-by-floor distribution of the 32 flats and the number of flats served per storey by each stair.
- Construction type (e.g. masonry / load-bearing frame), and the external-wall build-up and cladding/finish (see Section 10).
- Whether the scheme includes any basement, undercroft or ancillary plant/substation/bin/cycle stores, and their location.

The development provides 22 car parking spaces (including 4 with electric-vehicle charging) and 18 cycle parking spaces, with air-source heat pumps and associated landscaping.

The development is wholly residential; no commercial or other non-residential floorspace is proposed.

## 3 Derogations from the benchmark standard

As a new building, the development is designed to meet the benchmark standard in full.

## 4 Means of escape

### 4.1 Evacuation strategy

A “**stay put**” (**defend in place**) evacuation strategy is proposed, which is the conventional strategy for purpose-built blocks of flats. The building is designed so that a fire is contained within the flat of origin by robust compartmentation, supported throughout by an automatic fire-suppression system (see Section 5). In the event of a fire within a flat, only the occupants of that flat need to evacuate; occupants of other flats may remain in place unless directed otherwise or unless affected by fire or smoke.

In the event of fire or smoke detected within the common parts (for example the stair or a corridor/lobby), or a fire in a flat that breaches compartmentation, the position is managed by the smoke-control system and, where provided, the common-parts detection (see Sections 5 and 6).

### 4.2 Means of escape within flats

Each flat will be designed for escape in accordance with Approved Document B, Section 3. Single-storey flats will be provided with a **protected entrance hall** (minimum REI 30) serving all habitable rooms in accordance with paragraph 3.18 and Diagram 3.2, or, where the internal travel distance or floor height triggers the requirement, with an alternative exit. Any three-bedroom / larger flats arranged over more than one storey will be designed to one of the acceptable approaches for multi-storey flats in paragraph 3.21 (alternative exit from each non-entrance storey, with all habitable rooms having access to a protected landing).

### 4.3 Vertical escape — common escape route

Approved Document B and BS 9991 permit a **single common stair** to serve a block of flats where the top storey is not more than 18 metres above ground level, provided that the means of escape and smoke-control provisions below are satisfied. (For buildings with a top storey of 18 metres or more, current Government policy and the forthcoming amendment require a minimum of two stairs; this would apply only if the height is confirmed at 18m or above.)

Where a single stair is provided, it will be a **protected stairway** enclosed in fire-resisting construction, extending to a final exit at ground level. Every flat will be separated from the stair by a **protected lobby or protected common corridor** (see Section 4.4), so that there is more than one line of defence between any flat and the stair. The detailed acceptability of a single-stair solution for the confirmed number of flats per storey is to be demonstrated by the fire engineer, including where a BS 9991 engineered smoke-control design is adopted.

### 4.4 Protected lobbies and common corridors

Flat entrance doors will not open directly into the stair. Each flat will be separated from the common stair by a protected lobby or protected corridor, constructed as compartment walls and enclosed by fire doors, so as to limit the spread of smoke into the escape stair and to maintain the integrity of the stair as a place of relative safety. Dead-end corridor lengths and the maximum travel distance within the common corridor to the stair will be designed in accordance with Approved Document B / BS 9991.

### 4.5 Smoke control / ventilation

A smoke-control system will be provided to the common escape route to keep the stair and corridors/lobbies tenable for escape and firefighting. In a single-stair building, this is achieved either by automatic opening ventilation (AOV) — with a smoke vent of at least the area required by Approved Document B at the head of the stair, and ventilation to each corridor/lobby — or by a mechanical smoke-control (smoke-shaft) system designed in accordance with BS 9991. The smoke-control system will be actuated automatically on detection of smoke in the relevant corridor/lobby and stair.

#### 4.6 Occupancy, stair width and door furniture

Under a stay-put strategy, a stair of a width suitable for everyday use is generally adequate for escape purposes.

All final exit doors will be fitted only with simple fastenings that are easy to operate from the side approached by people escaping, operable without a key and without requiring more than one mechanism to be released (Approved Document B, paragraph 3.91). Where any secure door on an escape route is operated by an access-control system, it will fail safe to the unlocked position on actuation of the fire-detection system, on loss of power or system error, and on operation of a manual override, and will be installed in accordance with BS 7273-4 (paragraph 3.92).

#### 4.7 Inclusive evacuation

All 32 flats are designed as accessible / wheelchair-user dwellings (M4(2)/M4(3)). Where accessible dwellings are provided, the means of escape, the location of any refuge, and the management arrangements for assisting the evacuation of residents who cannot use stairs unaided (including Personal Emergency Evacuation Plans / Emergency Evacuation Information Sharing) will be addressed by the fire engineer and recorded in the fire-safety management arrangements (see Section 13).

### 5 Automatic fire suppression

Because the proposed building has a top storey **more than 11 metres above ground level**, an **automatic fire-suppression system is required throughout** the dwellings, in accordance with the requirements introduced by the 2020 amendment to Approved Document B, Volume 1.

The suppression system will be either a residential / domestic **sprinkler system installed in accordance with BS 9251**, or a residential / domestic **watermist system installed in accordance with BS 8458** (and the manufacturer's design and installation requirements), or the latest versions at the time of installation. The system will be installed throughout the flats (excluding spaces such as bathrooms where appropriate to the relevant standard).

The provision of an automatic suppression system is integral to the stay-put strategy and to several of the relaxations relied upon in this strategy (including fire-resistance periods, escape-route geometry and the single-stair solution). This is contingent on the >11m height confirmation at Section 1.4.

### 6 Detection and alarm

#### 6.1 Summary

The fire-detection and fire-alarm provision is a mixed system consistent with the stay-put strategy: detection within each flat to warn its own occupants, together with detection in the common parts to actuate the smoke-control system and to provide early warning in the escape route.

## 6.2 Within each flat

A fire-detection and fire-alarm system will be installed within each flat in accordance with **BS 5839-6**. Given the flats are anticipated to be rented, the system is specified to a **Grade D1, Category LD1** standard — a system of mains-powered detectors, each with a tamper-proof standby battery supply, installed throughout the flat including all circulation spaces forming part of the escape route and all rooms other than those with a negligible ignition source (such as bathrooms).

Operation of the detection within a flat will sound the alarm within that flat only. Detectors and alarms will comply with the relevant product standards (BS EN 14604 for smoke alarms; BS 5446-2 for heat alarms; BS 5446-3 for systems for people who are deaf or hard of hearing), and the system will be capable of being upgraded to incorporate visual and vibrating alarm devices where required. An installation and commissioning certificate will be provided for each flat.

## 6.3 Communal areas and smoke-control actuation

Detection will be provided in the common parts to actuate the smoke-control system (see Section 4.5) and, where required by the adopted strategy, to provide warning in the escape route. This will comprise smoke detection within the protected stair (at each landing level) and within each common corridor/lobby, together with detection within any basement, plant room, store and roof void as applicable, installed in accordance with **BS 5839-1** to the category appropriate to the strategy.

# 7 Emergency lighting and signage

## 7.1 Emergency lighting

Emergency escape lighting will be installed throughout the common escape routes — the protected stair, corridors and lobbies — and any basement and plant areas, in accordance with **BS 5266-1**. Luminaires will be non-maintained, three-hour-duration units, providing not less than 1 lux along the centre line of escape routes, with higher illuminance where required at high-risk task areas (BS EN 1838). Emergency lighting will also be provided externally at final exits that do not benefit from borrowed light. Key-operated test facilities will be provided, and an installation and commissioning certificate will be issued.

## 7.2 Wayfinding and emergency signage

As a block of flats more than 11 metres in height, the building is subject to the **Fire Safety (England) Regulations 2022**. Accordingly, **wayfinding signage** will be provided to identify floor levels and flat numbers, designed to be visible in low-level lighting and in conditions of smoke, including storey-identification signage within the protected stair at each landing. Within individual flats, exit signage is not generally required as residents are familiar with their own dwelling. Signage to ancillary fire doors (for example to plant, store and services rooms) will be provided in accordance with Approved Document B (“Fire door — keep shut” / “Fire door — keep locked shut” as applicable). It is recommended that all fire-resisting doors carry an

identification disc indicating the fire-resistance standard, to assist ongoing fire-safety management.

## 8 Internal fire spread (linings)

Internal wall and ceiling linings will resist the spread of flame over their surfaces and, if ignited, will have a rate of heat release that is reasonable in the circumstances, in accordance with Table 4.1 of Approved Document B:

| Location                                                                            | Classification |
|-------------------------------------------------------------------------------------|----------------|
| Small rooms (max internal floor area 4 m <sup>2</sup> in residential accommodation) | D-s3, d2       |
| Other rooms, and circulation spaces within a dwelling                               | C-s3, d2       |
| Other circulation spaces (including the communal areas of blocks of flats)          | B-s3, d2       |

## 9 Internal fire spread (structure)

### 9.1 Summary

The building will be designed so that its stability is maintained for a reasonable period in the event of fire, and so that the spread of fire within the building is inhibited by appropriate compartmentation. Fire-resisting walls, floors and doors will be identified on the fire-strategy plans.

### 9.2 Elements of structure

Structural frames, beams, columns, load-bearing walls, floors and similar elements will achieve, as a minimum, the fire resistance given in Appendix B (Tables B3/B4) of Approved Document B for a Purpose Group 1(a) building of the confirmed height.

### 9.3 Compartmentation

Every wall separating a flat from any other part of the building will be constructed as a compartment wall, and every floor will be a compartment floor. Compartment walls and floors separating flats from each other and from other occupancies will achieve a **60-minute** standard of fire resistance (Tables B3/B4), subject to confirmation per Section 9.2. There is no limit on compartment size in residential buildings. Compartment walls will be carried up to meet the underside of the roof covering, with fire-stopping to maintain continuity, and continued across any eaves.

### 9.4 Protected shaft (stair)

The common stair passes through compartment floors and is therefore a protected shaft. The walls and floors enclosing the protected shaft are compartment walls and floors and will achieve the 60-minute standard (subject to Section 9.2). The enclosure to lift shafts, service risers and any other shaft penetrating compartment floors will be constructed and fire-stopped to the same principle. **[VERIFY/INSERT: confirm the presence and location of any lift(s) and service risers, and that any lift is provided with the appropriate shaft protection.]**

## 9.5 Fire-resisting doors

Fire-resisting doors will be provided to maintain fire separation in accordance with Table C1 of Approved Document B. In summary:

- d) flat entrance doors (in a compartment wall) will achieve a **30-minute** standard, complete with smoke seals (FD30S), and will be fitted with a self-closing device (Appendix C);
- e) cross-corridor and lobby doors on the common escape route will be fire-resisting and self-closing to the standard required by the corridor/lobby design;
- f) doors to plant rooms, services rooms, stores and any basement will achieve at least a 30-minute standard; rooms kept locked shut when not in use need not be self-closing, save that any services / meter room will be self-closing.

All fire-resisting doors will be fitted with the appropriate intumescent strips and cold-smoke seals, a minimum of three fire-rated hinges with correct intumescent protection, and controlled gaps. Where flat entrance doors incorporate letter plates, these will be of a tested fire-resisting type maintaining the door's 30-minute integrity and smoke resistance; a multi-occupancy mail arrangement outside the communal entrance is recommended in preference to letter plates in flat entrance doors.

## 9.6 Protection of compartment walls from service breaches

Any pipe, duct, cable or other service penetrating a fire-separating element will be protected so that the fire resistance of the element is not impaired, by one of the methods in Section 9 of Approved Document B: a proprietary tested sealing system (any pipe diameter); a restricted-diameter pipe with fire-stopping in accordance with Table 9.1; or a sleeving arrangement. Ducts and dampers penetrating compartment walls/floors will be protected in accordance with Section 9.

## 9.7 Fire-stopping

Every joint, imperfection of fit or opening for services in a compartment wall or floor will be adequately sealed or fire-stopped so that the fire resistance of the element is maintained. Fire-stopping will be designed, installed and maintained in accordance with recognised guidance (including the ASFP guidance on passive fire protection).

## 9.8 Concealed spaces (cavities)

Cavity barriers will be provided to divide cavities and to close the edges of cavities, and at the locations required by Approved Document B (including at the edges of cavities and around openings, and at junctions between cavity walls and compartment floors/walls). Cavity barriers will provide a minimum of 30 minutes' integrity and 15 minutes' insulation (Table B3). Roof-space provisions will be designed so that compartment walls are carried to the underside of the roof covering, with the appropriate roof-covering and substrate provisions either side of compartment walls.

## 9.9 Places of special fire hazard

The building is subject to specialist fire hazard through the proposed M&E plant room. The plant room will be enclosed in fire-resisting construction and provided with the appropriate protection. Note that the location of any EV-charging equipment and of energy-storage / battery equipment should be reviewed for fire risk.

## 10 External fire spread

### 10.1 Space separation

The external walls and roof will be designed to adequately resist the spread of fire to and from neighbouring buildings, by limiting the extent of unprotected area in each elevation as a function of the distance to the relevant boundary, in accordance with Approved Document B, Section 12 and Appendix B. As a new building, the elevations will be designed to comply.

### 10.2 External wall construction and reaction to fire

The external surfaces of the walls will achieve the reaction-to-fire classification required by Table 10.1 of Approved Document B for a building of this height. As the building exceeds 11 metres in height, external-wall materials and surfaces will be specified to a robust standard — it is recommended that materials of limited combustibility (class A2-s1, d0 or better) be adopted for the external wall construction.

As noted at Section 1.4, the Regulation 7(2) ban on combustible materials in external walls applies to relevant buildings of 18 metres or more and is not engaged by this scheme on the basis of the confirmed height; the limited-combustibility approach above is adopted as best practice and to support the external-wall fire performance.

### 10.3 Balconies

Balconies are provided and they will be designed in accordance with the relevant Approved Document B / MHCLG guidance on balcony materials and detailing.

### 10.4 Roof coverings

Roof coverings will achieve the appropriate designation ( $B_{\text{roof}}(t_4)$  / equivalent) for the building's height and proximity to boundaries, with the required roof-covering and substrate provisions either side of compartment walls to limit fire spread across the roof.

## 11 Access and facilities for the fire service

### 11.1 Vehicle access

A fire appliance will be able to gain access to the building such that all points within each dwelling are within the hose-laying distance required by Approved Document B (Section 13) of an appliance parking position.

### 11.2 Firefighting facilities

On the basis of the confirmed height (top storey less than 18 metres), a firefighting shaft, firefighting lift and dry/wet rising main are **not required** by Approved Document B (these are triggered where a floor is 18 metres or more above, or in the case of basements more than 10 metres below, fire-service access level).

## 12 Provision of portable firefighting equipment

As residents are not trained in their use, portable firefighting equipment is not proposed in the common areas of the flats. This recommendation is made from plan inspection; the need for any portable equipment (for example in plant or service areas) will be confirmed by the fire risk assessment carried out under the Regulatory Reform (Fire Safety) Order 2005.

## 13 Fire-safety management and the regulatory framework

The Regulatory Reform (Fire Safety) Order 2005, as amended by the Fire Safety Act 2021 and supplemented by the Fire Safety (England) Regulations 2022, places duties on the responsible person for the common parts of a multi-occupied residential building. On completion and before occupation, the responsible person must ensure that a suitable and sufficient fire risk assessment is carried out, having particular regard to any persons at greater risk.

As a block of flats more than 11 metres in height, the building will be subject to the additional duties under the Fire Safety (England) Regulations 2022, which include the provision of wayfinding signage (Section 7.2), the provision of information to the fire and rescue service, and periodic checks of flat entrance doors and common-parts fire doors.

As confirmed at Section 1.4, on the basis of the height this building is not a higher-risk building for the purposes of the Building Safety Act 2022 and the associated occupation regime does not apply. This will be confirmed against the verified height before submission.

In accordance with Regulation 38 of the Building Regulations, the fire-safety information for the completed building will be provided to the responsible person. This fire strategy forms part of that fire-safety information and should inform the first fire risk assessment, recording the key fire-safety design objectives, assumptions and provisions for the building.