

Advice to the local planning authority

Advice to the local planning authority (LPA) from the Health and Safety Executive (HSE) as a statutory consultee for developments that include a relevant building.

To LPA	Haringey
LPA planning ref no	HGY/2023/0570
Our ref	pgo-3262
Site address	Omega Works, Hermitage Road, Tottenham, London, N4 1LZ
Proposal description	Redevelopment of the site for a mixed-use scheme comprising employment use (use Class E), 8 warehouse living units (sui-generis use class), and 76 residential units (use Class C3). Together with associated landscaping, cycle storage, accessible car parking spaces, children's play space, and waste & refuse areas. (Omega Works A)
Date on fire statement	17/06/2022
Date consultation received	18/05/2022
Date response sent	16/05/2023

1. Substantive response for the local planning authority

Thank you for consulting HSE about this application.

Headline response from HSE
Headline Response from HSE ('Advice to LPA' - Concern)

Scope of consultation

1.1. The above consultation relates to three buildings, blocks A, B and C, with storey heights of 11.55m, 23.55m and 23.55m respectively. All buildings are served by single staircases which constitute the only means of escape staircases and only fire service access staircases serving dwellings.

1.2. The fire statement states that the adopted fire safety design standards will be Approved Document B volume 2, and British Standard 9991. HSE has assessed the application accordingly, however, attention is drawn to the comments on design standards in the supplementary information.

Means of escape

1.3. Stairs in each building serve both residential and commercial uses, and connect with ancillary accommodation such as plant rooms and cycle stores. The adopted fire safety design standard, BS9991, addresses connections between single staircases, ancillary accommodation and non-residential uses and states:

*'Any stair serving a dwelling within a mixed-use development **should not communicate with any other occupancy**'* (clause 31); and,

*'Any common stair **which does not form part of the only escape route from a flat** may also serve ancillary accommodation if it is separated from the ancillary accommodation by a protected lobby or protected corridor'* (clause 14.1.6); and,

*'Ancillary accommodation **should not connect with any part of the only escape route** from one or more dwelling(s) on the same storey as the ancillary accommodation'* (clause 37); and,

*'Where a common stair forms part of the only escape route from a flat... it should not also serve any covered car park, boiler room, fuel storage space **or other ancillary accommodation of similar fire risk**'* (clause 38).

1.4. Accordingly, the connections of the single residential staircase with commercial uses and ancillary accommodation is not appropriate. Design changes necessary to provide separated access and egress routes from such areas will affect land use planning considerations such as the layout and appearance of the development.

1.5. The single staircases in block A descend to the basement. Where flats are served by a single staircase, in buildings over 11m in height, the staircase should not descend to the basement. Design changes necessary to provide separated access and egress routes from the basement will affect land use planning considerations such as the layout and appearance of the development

External fire spread

1.6. Section drawings show the building extends to the red line site boundary. There is no information in the fire statement to indicate that the potential for fire spread over the site boundary has been assessed. Any design changes necessary to prevent such fire spread may affect land use planning considerations such as the appearance and layout of the development.

2. Supplementary information

The following information does not contribute to HSE's substantive response and should not be used for the purposes of decision making by the local planning authority.

Fire safety design standard

2.1. It is noted that the proposed development includes a novel design and sui generis use. It is likely that such a design falls outside of the scope of the adopted fire safety design standards, which are for common building situations. It will be for the applicant to demonstrate that an appropriate fire safety design standard has been used at subsequent regulatory stages, whether that is a prescriptive standard or a performance based design, or both.

Yours sincerely

16/06/2023

A handwritten signature in black ink, appearing to read 'Jon Bryan', is positioned above a solid black horizontal line.

Signed by: jon.bryan

This response does not provide advice on any of the following:

- matters that are or will be subject to Building Regulations regardless of whether such matters have been provided as part of the application
- matters related to planning applications around major hazard sites, licensed explosive sites and pipelines
- applications for hazardous substances consent
- London Plan policy compliance

