

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/2023/2306
Our ref	pgo-4009
Site address	819-829 High Road, Tottenham, London, N17 8ER
Proposal description	Full planning application for the demolition of existing buildings and structures to the rear of 819-829 High Road; the demolition of 829 High Road; and redevelopment for purpose-built student accommodation (Sui Generis) and supporting flexible commercial, business and service uses (Class E), hard and soft landscaping, parking, and associated works. To include the change of use of 819-827 High Road to student accommodation (Sui Generis) and commercial, business and service (Class E) uses. Listed Building Consent for internal and external alterations to 819/821 High Road (Grade II), including reinstatement of hipped roof, demolition works to the rear, façade and related external works, internal alterations and associated works.
Date on fire statement	22/08/2023
Date consultation received	25/09/2023
Date response sent	24/10/2023

1. Substantive response for the local planning authority

Thank you for consulting HSE about this application.

Headline response from HSE
Headline Response from HSE ('content')

Scope of consultation

- 1.1. The above consultation relates to the erection of a new residential student development comprising of 1,514 beds in four 8 storey residential blocks:
 - **Block A** - comprises residential accommodation (residential flats, maisonettes, studios, residential bedsits, cluster flats), common amenity spaces and ancillary accommodation. With a block height of circa 12.5m.
 - **Block B** - comprises residential accommodation (residential flats, maisonettes, studios, residential bedsits, cluster flats), commercial units, common amenity spaces and ancillary accommodation. With a block height of circa 18.5m.
 - **Block C** - comprises residential accommodation (residential flats, maisonettes, studios, residential bedsits, cluster flats), commercial units, common amenity spaces and ancillary accommodation. With a block height of circa 15.5m.
- 1.2. It is understood all three blocks are served by single staircases. Block B has a firefighting shaft, all staircases served by a dry rising main. Block B is a relevant building. The remaining blocks are buildings within the curtilage of a relevant building.
- 1.3. It is noted that the adopted fire safety design standard is British Standard 9991 ('BS9991') for residential areas, British Standard 9999 ('BS9999') for commercial areas and ADB Volume 1 used for requirements of sprinklers and external walls. HSE has assessed the application accordingly.
- 1.4. Following a review of the information provided in the planning application, HSE is content with the fire safety design as set out in the project description, to the extent it affects land use planning considerations. HSE has identified a number of items as supplementary information, set out below. The applicant is advised to consider these matters in advance of later regulatory stages.

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 Statement

- 2.1. HSE acknowledges that the RIBA 3 Fire Strategy, provided with this application is comprehensive. This is welcomed and has supported the HSE's assessment process.

Photovoltaic Panels

- 2.2. The roof plan drawings for each block show the proposed installation of photovoltaic panels (PV panels). Where the roof top installation of PV panels is proposed, it should be noted that fire safety standards require suitable support of cabling to avoid obstruction of escape routes and firefighting access due to the failure of fixings and consideration should be given to ensure that all power supplies, electrical wiring and control equipment is provided with appropriate levels of protection against fire.

New studio apartments

- 2.3. Section 4.5.3 of the RIBA 3 Fire Strategy details the Studio accommodation provision.
- 2.4. Fire safety standards state that *“the kitchen should be enclosed in open-plan flats having an area exceeding 8m × 4m. Cooking appliances in open-plan flats having an area smaller than 8m × 4m should not be adjacent to the entrance of the flat.”* Cooking facilities should be located at the most remote part of the flat to protect the means of escape. Any design changes necessary will not affect land use planning in this instance and will be subject to later regulatory consideration.

Cluster accommodation

- 2.5. Plan drawings show single means of escape from cluster accommodation in Blocks A, B and C is by way of a common corridor/lobby serving studio dwellings.
- 2.6. Fire safety standard 9991 states that: *“The cluster should be lobbied from any staircases serving the building (i.e. a protected lobby should be formed between the cluster front entrance door and the stair door)”*. Where travel distance is measured to a stair lobby door the lobby should not directly connect with any dwelling, storage space or any other space containing a potential fire hazard.
- 2.7. Any design changes necessary are unlikely to affect land use planning in this instance and will be subject to later regulatory consideration.
- 2.8. HSE welcomes that the cluster kitchens(s) in Blocks A,B and C of the building on most levels are located at the end of the corridor away from the final exit (cluster entrance door). However, it is noted that the position of the cluster kitchen on the top floor of Block B results in cluster bedrooms having to pass the kitchen door to exit the cluster.
- 2.9. The cited fire safety standard states kitchens should be located at the remote end of the corridor away from the final exit to the cluster and it will be for the applicant to demonstrate compliance at later regulatory stages. Additionally, any necessary internal alterations are unlikely to affect land use planning considerations

Means of escape

- 2.10. Section 3.3 of the RIBA 3 Fire Strategy states that mechanical smoke extract will be located in all stair core lobbies. The CFD for the mechanical system will be carried out at the detailed design stage; this CFD will also be used to assess and validate the tenability conditions within the common corridors for means of escape and firefighting.
- 2.11. It will be for the applicant to demonstrate that the means of escape is capable of being safely and effectively used at all material times, including during firefighting operations, and that the proposed fire engineered solution(s) provides an equivalent level of fire safety to that of code compliance.

2.12. This matter will be considered at a later regulatory stage. If the CFD analysis does not support the design, then this may affect land use planning considerations.

Habitat/green roof

2.13. A habitat or green roof may constitute a fire hazard as it requires a regular management and maintenance regime. Paragraph 12.3 of Approved Document B volume 1 ('ADBv1') states; *"separation distance is the minimum distance from the roof, or part of the roof, to the relevant boundary. Table 12.1 sets out separation distances by the type of roof covering and the size and use of the building. In addition, roof covering products (and/or materials) defined in Commission Decision 2000/553/ EC of 6 September 2000, implementing Council Directive 89/106/EEC, can be considered to fulfil all of the requirements for the performance characteristic 'external fire performance' without the need for testing, provided that any national provisions on the design and execution of works are fulfilled, and can be used without restriction"*.

2.14. It will be for the applicant to demonstrate that the proposed habitat roofs are viable in relation to fire safety. This will be subject to further consideration at a later regulatory stage.

2.15. It will be for the applicant to demonstrate that the proposed green roofs are viable in relation to fire safety. This will be subject to further consideration at a later regulatory stage.

2.16. This document [Fire Performance of Green Roofs and Walls \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/364822/Fire_Performance_of_Green_Roofs_and_Walls.pdf) will provide guidance on the fire performance aspects of green roof and wall construction and maintenance.

Fire service access and facilities

2.17. The applicant's proposal within the RIBA 3 Fire Strategy shows access and parking adjacent to the firefighting shaft in Block B and is proposed to incorporate the undercroft access to the western courtyard off Brunswick Street.

2.18. Although the proposed access appears to be acceptable, the landscaping layout seems to be restrictive, particularly regarding firefighting operations in a developing fire situation. The inclusion of a designated fire appliance parking space would help secure the straightforward commencement of firefighting operations.

2.19. Firefighting operational guidance published by the National Fire Chiefs' Council stipulates that firefighter 'entry control points' should be established in a safe position, in safe air, near the scene of operations. Furthermore, firefighters must consider the potential for escalation of the incident, and the best access to and egress from the scene of operations.

2.20. Any design changes necessary are unlikely to affect land use planning in this instance

and will be subject to later regulatory consideration. However, care should be taken to ensure firefighting operations are not impeded by a cluttered environment in the courtyard when developing the landscape design. Some of the indicative designs shown in the application would not provide for reasonable firefighting access and facilities.

Yours sincerely

Gareth Underhill

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Fire Safety Information Assessor

Guidance on Planning Gateway One is available on the Planning Portal: [Planning and fire safety - Planning Portal](#).

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

