

NORTHUMBERLAND DEVELOPMENT PROJECT **HOTEL**

S73 APPLICATION

GATEWAY 1 FIRE FORM UPDATE



Project No.: LO23024

Date: 25/10/2023

Filename: NDP Hotel-OFR Gateway One Fire Form

Revision: R03

Author: C. Harrop / J. Cardrick

Reviewer: L. Caddy

Approver: S. Dabin

1 INTRODUCTION

OFR Consultants (OFR) have been appointed by Tottenham Hotspur Property Company Limited (“THFC”) (hereafter referred to as the ‘the Applicant’) to develop a Fire Statement in support of an application for minor material amendments to the London Borough of Haringey (“LBH”) made under Section 73 (“S73”) (“S73 Application”) of the Town and Country Planning Act 1990 (as amended), following the grant of planning permission for the Northumberland Park Development Project (“NDP”) (“the Site”) on 15 April 2016 (LPA ref HGY/2015/3000). The application proposes amendments focussed on Plot 3 (‘Hotel’), as part of the wider Tottenham Hotspur Stadium development in North London, located in the London Borough of Haringey.

This Gateway One Fire Form outlines the fire safety provisions in line with the Town and Country Planning Development Management (England) Procedure Order 2015 as amended by article 4 of the 2021 Order. This Gateway One Fire Form aims to provide an abridged version of a fire strategy, and follows the process as outlined within the UK Government Guidance issued on 24/06/21 that came into effect on 01/08/21. Article 4 of the Town and Country Planning (Development Management Procedure and Section 62A Applications) (England) (Amendment) Order 2021 introduced Article 9A onto the Town and Country Planning (General Permitted Development) (England) Order 2015 which provides measures to ensure that fire safety matters have been considered as part of the planning permission submittal for the procedural “Gateway” stages of relevant high-rise buildings. A relevant building in the context of Planning Gateway One is defined as a building containing two or more dwellings or educational accommodation and has a height of at least 18m or seven or more storeys. The Government introduced Planning Gateway One which has two key elements:

- *To require the developer to submit a fire statement setting out fire safety considerations specific to the development with a relevant application for planning permission for development which involves one or more relevant buildings; and*
- *To establish the Health and Safety Executive (HSE) as a statutory consultee for relevant planning applications.*

This Gateway One Fire Form outlines the fire safety provisions in line with Article 9A of the Town and Country Planning Development Management (England) Procedure (England) Order 2015 which was inserted under article 4 of the Town and Country Planning (Development Management Procedure and Section 62A Applications) (England) (Amendment) Order 2021, which came into force on August 1st, 2021. To ensure compliance, this Gateway One Fire Form is in the format prescribed by the UK Government Guidance Publication¹ of June 24th, 2021, on “Fire safety and high-rise residential buildings (from 1 August 2021)” which requests that submission is to be via a form published by the Secretary of State (or a form to similar effect) containing the particulars specified of referred to in the form, which includes information about (not exhaustive list):

- The principles, concepts and approach relating to fire safety that have been applied to each building in the development.
- The site layout.
- Emergency vehicle access and water supplies for firefighting purposes.
- What, if any, consultation has been undertaken on issues relating to the fire safety of the development, and what account has been taken of this; and,
- How (if any) policies relating to fire safety in relevant local development documents have been taken into account (e.g. The London Plan 2021).

This document is intended to be concise, relevant, and proportionate in information that specifically addresses the fire safety consideration of the development, to that of a RIBA Stage 2 Fire Strategy. Nevertheless, it is important to note that this document does not constitute a comprehensive Fire Strategy report, which is a separate exercise that is required to comply with Part B of the Building Regulations (Schedule 1). However, this Fire Statement evidences the fire safety provision proposed as part of the current fire strategy, which has been developed by following the guidance of BS 9999:2017 and BS 9991:2015.

¹ UK Government Guidance on Fire Safety and high-rise residential buildings: <https://www.gov.uk/guidance/fire-safety-and-high-rise-residential-buildings-from-1-august-2021>



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2 FIRE STATEMENT FORM

Application Information	
1. Site address line 1	Tottenham Hotspur Stadium
Site address line 2	748 High Road
Town	Tottenham
County	London
Site postcode (optional)	N17 0AP
2. Description of proposed development including any change of use (as stated on the application form):	The description of the development is as follows: <i>“Application under Section 73 of the Town and Country Planning Act for variations to Condition A4 (Consented Drawings and Documents) and Condition A7 (Maximum Quantity/Density) of the hybrid planning permission HGY/2015/3000 (as amended) for the proposed demolition and comprehensive redevelopment of the Northumberland Park Development Project (the amendments consist of revisions to the design, height and maximum floorspace at Plot 3 Hotel and other changes).”</i> This Section 73 Application will seek to vary Conditions A4 and A7 of the NDP Hybrid Consent, approved on 15 April 2016 (LPA ref. HGY/2015/3000). It relates solely to Plot 3 (Hotel) and proposes the following amendments to the approved scheme for Plot 3: • Changes to the building form and layout; • Increase to the height of the building from 23 to 31 storeys; and, • An increase in the site wide hotel floorspace to 16,601 sq.m.
3. Names of persons completing the fire statement (as section 15.), relevant qualifications and experience.	A suitably qualified Chartered Engineer has been involved in the production of this document. The relevant approver below is a Chartered Engineer with the Engineering Council UK and have the post-nominals CEng (Chartered Engineer) after their name. Stewart Dabin Design Director BEng CEng MIFireE Stewart is a Director based in our London Office. Stewart is a Chartered Fire Engineer with 20 years’ experience in developing innovative fire strategies for a wide variety of complex buildings throughout the world; including Residential, Commercial, Transportation, Retail and Public Assembly Building. Stewart specialises in high residential towers and his recent project experience includes working on the London Olympia Redevelopment Project, with the Elephant Park Masterplan with Lend Lease and the British Land Masterplan at Canada Water.

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	Liam Caddy Senior Fire Engineer BEng (Hons) MIET AIFireE CSCS – Academically Qualified Person Liam started working as a fire safety consultant in 2019 in our London Office, having graduated from the University of Southampton in Electrical and Electronic Engineering. Liam has worked on a number of key residential, office and mixed-use buildings across the UK, with a focus in London.
	Chloe Harrop Graduate Fire Engineer MEng (Hons) CSCS – Academically Qualified Person Chloe joined OFR Consultants in London following graduating from the University of Sheffield with a master’s degree in Engineering (Civil) achieved in 2022. Her general engineering background enables her to provide a diverse approach to problem solving. Chloe’s interest in fire engineering came from undertaking a dissertation exploring the possibility of tall timber buildings.
	Jack Cardrick Graduate Fire Engineer BEng Jack graduated from the University of Bristol in 2022 with a bachelor's degree in Aerospace Engineering. He has since joined up with our Bath Office at OFR Consultants as of 2023.
4. State what, if any, consultation has been undertaken on issues relating to the fire safety of the development; and what account has been taken of this.	The fire safety design principles for the building are based on satisfying Part B of the Building Regulations, inclusive of all current updates in guidance to date. These include amendments to statutory legislation, i.e., Building Regulation 7 for high rise residential buildings, and the recently released open consultation by the Government and the position statement of the National Fire Chiefs Council (NFCC) on staircases in residential buildings. Regular consultation with Building Control will be held during the design stages ensuring clarity and agreement of the fire strategy by all necessary stakeholders. The building's fire safety design principles follow Part B of the Building Regulations (Schedule 1), incorporating all up-to-date guidance amendments, including the revised design guidance after the implementation of Regulation 7 for relevant buildings. Initial consultations have been undertaken with the Building Control body (Haringey Building Control), to discuss and agree in principle the key fire strategy principles of design. The fire strategy design is still subject to formal consultation with the Building Control body, including their consultations with the London Fire Brigade. This will need to form part of the fire strategy as the design progresses.



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	The outcomes of any future consultation with the Health and Safety Executive (HSE) and the London Fire Brigade (LFB) will also be used to inform the design. However, in any case the building has been afforded two vertical escape routes for each storey/demise, notably for the residential portions, to adopt a two-stair strategy having no reliance on adjacent demises for means of escape or firefighting access. As part of the fire safety design proposals, OFR have coordinated the fire safety strategy principles for the plans in which the building has been reviewed against Policy D5 and Policy D12 as part of the London Plan. These policies have been addressed through a separate document (London Plan, Policy D12B Fire Statement following Form 1 and Form 3) produced by OFR Consultants.
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5. Site layout plan with block numbering as per building schedule referred to in 6.

Site layout plan is provided below:

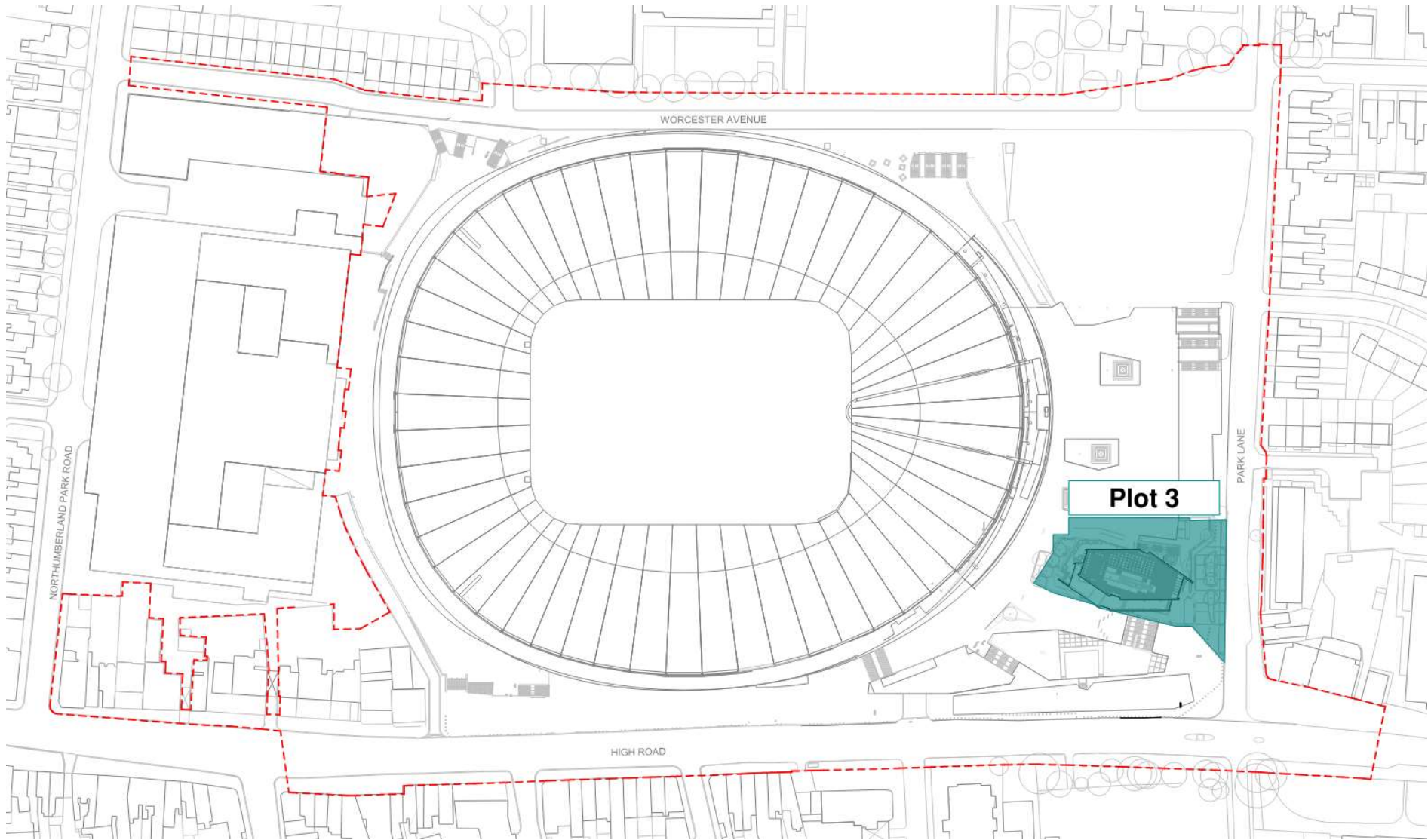


Figure 1 – Site Plan

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The principles, concepts and approach relating to fire safety that have been applied to the development									
6. Building schedule									
Site Information				Building Information			Resident Safety Information		
a) block no. as per site layout plan above	b) - block height (m) - number of storeys excluding those below ground level - number of storeys including those below ground level	c) proposed use (one per line)	d) location of use within block by storey	e) standards relating to fire safety/ approach applied	f) balconies	g) external wall systems	h) approach to evacuation	i) automatic suppression	j) accessible housing provided
NDP Hotel	– 107.9 m – 31 storeys – 32 storeys, 1 below ground	Car Park and Plant / Ancillary Areas	Basement Level B1	BS9999	No balconies	N/a	Simultaneous	Yes – commercial sprinklers, full	N/A non resi
		Back of House / Ancillary Areas	Ground	BS9999	No balconies	Class A2-s1, d0 or better	Simultaneous	Yes – commercial sprinklers, full	N/A non resi
		Hotel inc Ancillary and Amenity Areas	Ground – Level 13	BS9999	No balconies	Class A2-s1, d0 or better	Simultaneous	Yes – commercial sprinklers, full	N/A non resi
		Residential Ancillary and Amenity Areas	Level 14	BS9999	No balconies	Class A2-s1, d0 or better	Simultaneous	Yes – commercial sprinklers, full	N/A non resi
		Residential apartments	Level 15 – Level 29	BS9991	Class A2-s1, d0 or better	Class A2-s1, d0 or better	Stay put	Yes – residential sprinklers, full	M4(2) & M4(3)

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a) block no. as per site layout plan above	b) - block height (m) - number of storeys excluding those below ground level - number of storeys including those below ground level	c) proposed use (one per line)	d) location of use within block by storey	e) standards relating to fire safety/ approach applied	f) balconies	g) external wall systems	h) approach to evacuation	i) automatic suppression	j) accessible housing provided
		Residential Duplexes	Level 29 – Level 31	BS9991	Class A2-s1, d0 or better	Class A2-s1, d0 or better	Stay put	Yes – residential sprinklers, full	None
		Roof top plant	Level 31 – Level 32	BS9999	No balconies	Class A2-s1, d0 or better	Simultaneous	N/A – external	N/A non resi



7. Specific technical complexities

Explain any specific technical complexities in terms of fire safety (for example green walls) and/or departures from information in building schedule above.

- i. The building contains both residential and commercial use areas. However, means of escape between the commercial occupancies and residential occupancies shall be separate. Each area will be designed in accordance with the relevant guidance (BS 9999 and BS 9991 respectively), and all interfaces will be carefully considered to ensure compliance of fire strategy elements such as evacuation regimes, separation between escape routes, fire separating construction and access and provision for the Fire Service.
- ii. The development contains a building over 50 m in height, making it a non-conventional by virtue of height. As such, a qualitative design review (QDR) process will be undertaken with all stakeholders, inclusive of the Approval Authorities, across the design stages.
- iii. In meeting Policy D5 of the London Plan, at least one lift for evacuation purposes will be provided serving each occupancy. There is currently no standard for evacuation lifts which supports self-evacuation (as applicable to the residential accommodation), as BS EN 81-76: 2019 is still in draft, the design and specification of evacuation lifts therefore presents a challenge. As the design progresses the specification for the evacuation lift in the residential accommodation will be reviewed against the latest standards once published, however it is currently proposed that additional lifts will be proposed as combined firefighting / evacuation lifts, in excess of the number of firefighting lifts needed for firefighting purposes, with the associated communications/controls to support evacuation of mobility impaired occupants. To facilitate evacuation lift provisions, adequate protected lobbies and smoke control systems (where applicable) will ensure tenable conditions are met within the premises where occupants wait for an evacuation lift.
- iv. Following the recent DLUHC public consultation on two-stair designs for buildings over 30m in December 2022 the residential accommodation is afforded two vertical escape routes for each storey. Therefore, the residential section of the building is served by two stair cores. These stair cores are both to function as a firefighting stair for the building and thus are to have a minimum clear width of 1,100mm. This width is suitable for both means of escape and firefighting purposes. This additional stair serves into one of the common corridors of the residential levels, with the primary firefighting stair opening directly into the lift lobby served by the two firefighting / evacuation lifts.
- v. For the residential accommodation, within common corridors / evacuation lift lobbies, mechanical ventilation will be provided to support the two stair arrangements provided in each building. These provisions will be supported with computational fluid dynamics (CFD) to show that evacuation lift lobbies are tenable, and the staircases remain suitable for evacuation and firefighting purposes.
- vi. Within the residential flats, the kitchens are proposed to be unenclosed (open plan layout), as such a radiative fractional effective dose analysis shall be carried out to escape the suitability of escape past hobs.
- vii. As a hotel and residential building which exceeds 15 storeys this structure should be considered under a Consequence Class 3 as per Approved Document A: Structure (ADA). ADA recommends a systematic risk assessment of the building to be undertaken. As such a probabilistic Risk Assessment (time equivalence) should be undertaken considering fire-associated risks to structural elements to inform the Qualitative Design Review process.
- viii. A commercial sprinkler system meeting the requirements for an HHP3 hazard group is to be installed in line with BS EN 12845 to protect the basement plant and ancillary areas of the building. This increased category specification is due to consideration of the car park within the basement of the building, and as advised when following LPC rules.
- ix. The proposed building is over 18 m in height to the topmost accessible storey, and the building has a floor area over 900m². However, in the hotel demise of the building, only of the stair cores have been designed as a fire-fighting shaft. On the hotel levels, and in consideration of the floor areas, which marginally exceed the 900m² area limitation as stated by guidance for a single firefighting shaft. However, only one firefighting shaft has been proposed within the hotel levels given that the 900m² area limit is only exceeded when measuring GIA, in which the NIA excluding the cores falls below this limit. Further, the hose laying for all hotel levels is within the 60m limit from the single firefighting shaft provided. However, this approach is subject to discussion and formal approval with the approval authorities.



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x. At basement level there is an extended hose laying distance to reach the plant areas at the north portion of the basement. To support this an additional dry riser was introduced to the northernmost escape stair serving this space. However, there are still areas that fall behind this 45m limit, this approach will therefore be subject to formal agreement with the approval authorities. It is noted that these spaces served by the extended distances, will only contain low risk water plant for the building.
8. Issues which might affect the fire safety of the development Explain how any issues which might affect the fire safety of the development have been addressed. To address the complexities in the NDP Hotel development, guidance-based design and performance-based assessments will be undertaken to demonstrate that the functional objectives of the Building Regulations are satisfied, and to provide the design team with a considered fire safety report capturing the performance specification applicable to each of their respective disciplines. Performance-based solutions include but are not limited to structural probabilistic risk analysis, computational fluid dynamics modelling, radiative fractional effective dose analysis in open-plan flats, and active fire safety system redundancies. As such, a qualitative design review (QDR) process will be undertaken with all stakeholders, inclusive of the Approval Authorities, across the design stages. The relevant technical complexities as set out Section 7 are those which will be addressed as part of the QDR process.
9. Local development document policies relating to fire safety Explain how any policies relating to fire safety in relevant local development documents have been taken into account. The development is located within an area where the London Plan 2021 is applicable. Therefore, consideration has been given to the provisions for the safety of occupants as well as the provision of suitable access and provisions for firefighting in line with Policy D12. In order to achieve the highest standards of accessible and inclusive design, as advocated by Policy D5: Inclusive design. Within each of occupancies of NDP Hotel development, these will be provided with at least one evacuation lift per lift core to provide a safe and dignified means of escape for all building users, these will be designated as combined firefighting/evacuation lifts, in excess of the number of firefighting lifts needed for firefighting purposes. These can be used for evacuation purposes when not in operation by the fire service, and can be used by the fire service as they see fit on their arrival. The London Plan is addressed though a separate Fire Statement document produced by OFR Consultants (London Plan, Policy D12B Fire Statement following Form 1 and Form 3). This, in conjunction with the architectural design, takes into account the necessary considerations for escape of mobility impaired occupants, and ensuring all fire strategy provisions are to the relevant standards for fire safety of the building and all its occupants. Initial consultations have also been undertaken with the Building Control body (Haringey Building Control), to discuss and agree in principle the key fire strategy principles of design. The fire strategy design is still subject to formal consultation with the Building Control body, including their consultations with the London Fire and Rescue Service. This will need to form part of the fire strategy as the design progresses.



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Emergency road vehicle access and water supplies for firefighting purposes
10. Fire service site plan Explanation of fire service site plan(s) provided in 14. Including what guidance documents have informed the proposed arrangements for fire service access and facilities? BS 9999:2017 / BS 9991:2015 informs the proposed arrangements for fire service access and facilities. The proposed building is over 18 m in height to the topmost accessible storey, and the building has a floor area over 900m². Therefore, in the residential demise of the building, both of the stair cores have been designed as fire-fighting stairs. However, in the hotel demise of the building, only of the stair cores have been designed as fire-fighting shafts (this is as discussed in Section 7). Firefighting shafts are generally designed as follows: • A fire-fighting stair with a minimum clear width of 1100 mm and provided with an AOV with a minimum free area of 1.0 m² at the head of the stair. • Served by a ventilated fire-fighting lobby / corridor on all upper levels. • A firefighters lift in accordance with the guidance within BS EN 81-72:2020. The landing doors of the firefighting lifts shall not be more than 7.5 m away from the stair door; and • A wet fire main (to be designed and installed in accordance with BS 9990:2015) with landing valves at each level and located within the enclosure of the firefighting stairs in the residential demise, and in the firefighting lobbies of the hotel demise. • Every part of every storey shall be within the 60 m from the wet riser in firefighting shafts / firefighting stairs, or within 45m of the dry riser main in the non-firefighting stair at basement level, as measured on a route suitable for laying hose. The basement level exceeds the 900m² area limit, as such this is to be served by a minimum of two firefighting shafts. Therefore, two firefighting stairs (one serving the hotel and one serving the residential) shall be extended to the basement to provide hose coverage to this level. Further, to support hose coverage, an additional dry riser was introduced to the northernmost escape stair serving this space. To help facilitate response to any incident and in recognition of the evacuation strategies and complexity of the building, it is proposed that a Fire Control Centre (FCC) is provided in aid of firefighting operations and co-ordination. The location of the FCC is proposed to be on ground floor level, available from the back of house protected corridor accessed from Park Lane.
11. Emergency road vehicle access Specify emergency road vehicle access to the site entrances indicated on the site plan. Vehicle access to the site is between Park Lane and High Road (A1010) to the building, where Park Lane is to be the primary access point for the building where access can be made directly into the south of the building from this point. Further, alternative firefighter access to the building can be from the podium side, with fire service vehicle access confirmed to be suitable for this portion of the site at L01. Is the emergency vehicle tracking route within the site to the siting points for appliances clear and unobstructed? yes



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12. Siting of fire appliances
All wet riser inlets will be within 18 m of the fire vehicle parking positions, and near to entrances into the building for firefighting. One wet riser will be located in the firefighting lobby of the hotel firefighting shaft at all levels, and wet risers will be located in the full landings of both the residential firefighting stairs at all levels. Further, to support hose coverage at basement level, an additional dry riser was introduced to the northernmost escape stair serving this space. The fire appliance parking positions are primarily on Park Lane along the Southern boundary of the site for access to the firefighting cores for all demises, with alternative firefighter access available at Level 1 of the building can be made from the podium side.
13. Suitability of water supply for the scale of development proposed
Hydrants should be within 90 m of the fire main inlet points to support fire-fighting operations. Provisions are expected to be satisfactory by virtue of being an existing condition in a developed area. However, it has been confirmed through correspondence with the LFB Water Team that the water supply provisions (including hydrant location and flow rates), are suitable and operable within the site. Nature of water supply: [hydrant- public A sprinkler and wet riser water tank supply will also be provided. Does the proposed development rely on existing hydrants and if so, are they currently usable / operable? [yes



14. Fire service site plan

Fire service site plan is provided below:

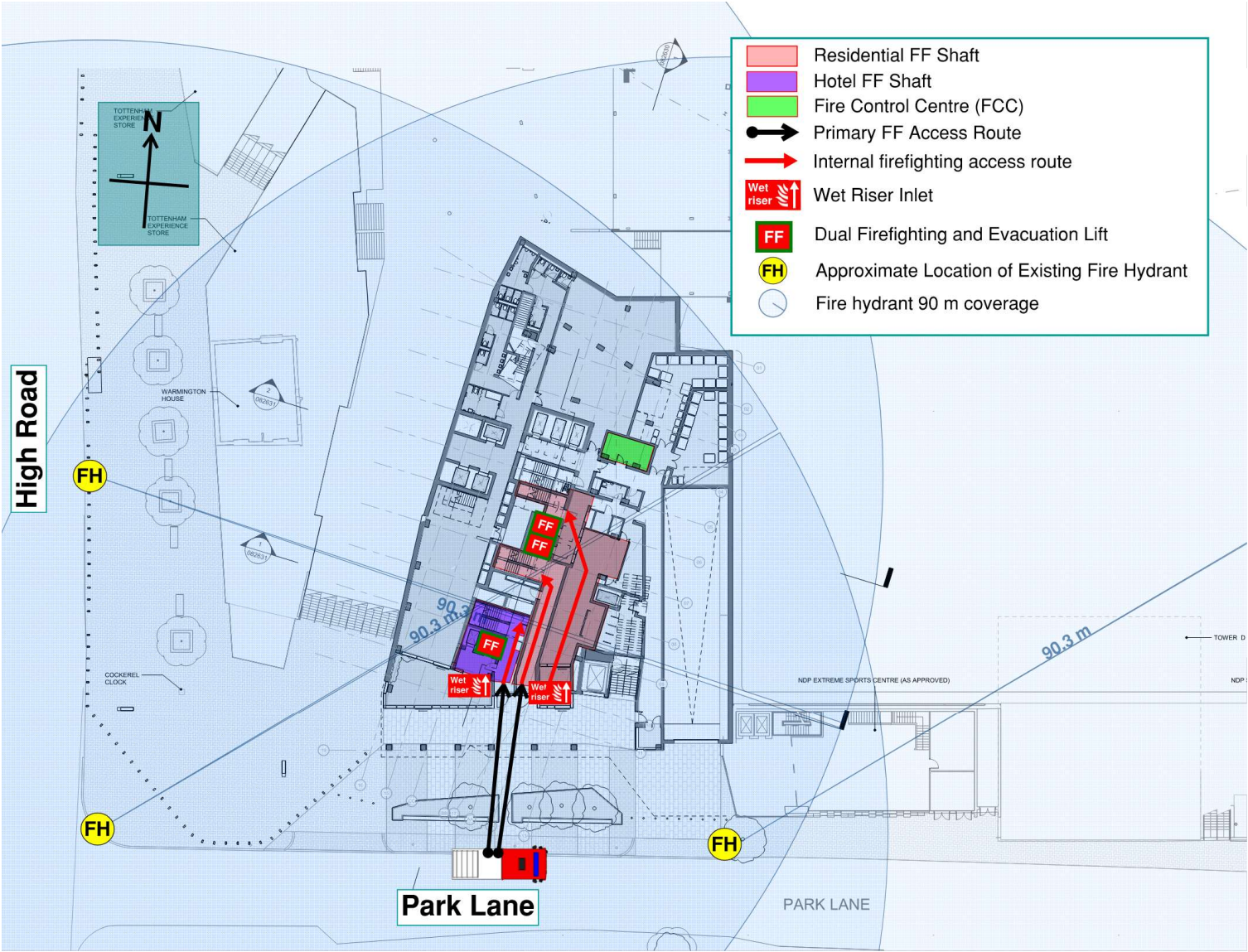


Figure 2 – Firefighting access routes and building entry points as shown from Ground Floor General Arrangement as provided by F3 Architects

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Fire statement completed by	
15. Signature	Liam Caddy  Stewart Dabin 
16. Date	25/10/2023