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Planning Fire Safety Strategy (London Plan Policy D12)

To: Planning Department, London Borough of Haringey

Site: 49 Sylvan Avenue, London N22 5JA

Proposal: Change of Use from C3 Dwellinghouse to C4 House in Multiple Occupation (HMO)

Subject: Full Planning Application Submission – C3 → C4 HMO with External and Internal Alterations

Date: 9 September 2026

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1. Introduction

This Fire Safety Strategy is submitted in accordance with Policy D12(A) of the London Plan (2021).

The proposal involves the change of use of an existing two-storey dwellinghouse to a small House in Multiple Occupation (Use Class C4). Internal works consist of reconfiguration to provide six single-occupancy bedrooms, each with a private en-suite bathroom, and two shared kitchens — one on each floor. A new side alleyway is created to provide secure access to external cycle storage, but no extensions or changes to the building footprint are proposed.

The strategy is proportionate to the scale and nature of the development and addresses all five criteria of Policy D12(A).

2. Fire Safety Objectives (Policy D12 Criteria)

Criterion 1: Identifying Fire Risks and Relevant Assets

The building comprises two floors of residential accommodation accessed via a protected internal staircase leading to the main entrance at ground-floor level. Fire risks relate primarily to:

- Cooking activities within the two shared kitchens
- Electrical appliances within bedrooms
- Potential ignition sources within en-suite bathrooms
- Escape routes via the internal staircase

All bedrooms will be fitted with FD30S fire-resistant doors. En-suite bathrooms will be constructed with fire-resistant partitions. Smoke and heat detection will be installed throughout in accordance with BS 5839-6 (Grade D1, LD2), with interlinked alarms in hallways, bedrooms and kitchens.

The new side alleyway does not form part of the escape route and does not introduce additional fire risk.

Criterion 2: Means of Escape and Evacuation

All occupants benefit from a clear and direct means of escape via the protected internal staircase leading to the main entrance at ground-floor level. The escape route is short, protected and unobstructed.

Key measures include:

- FD30S fire doors to all bedrooms
- Interlinked smoke alarms in hallways and bedrooms
- Heat detectors in kitchens
- Emergency lighting where required
- Tenant information on evacuation procedures

No secondary escape route is required due to the building's height, layout and compliance with small HMO standards.

Criterion 3: Passive and Active Fire Safety Measures

Passive measures include:

- FD30S fire-rated doors
- Fire-resistant partitions between bedrooms and communal areas
- Fire-resistant construction to en-suite bathrooms
- Protected internal staircase

Active measures include:

- Interlinked smoke and heat detection system (BS 5839-6)
- Emergency lighting
- Fire blankets in kitchens
- Portable extinguishers in communal areas (CO₂ and water mist)

The external cycle and refuse enclosures do not affect internal fire safety and are located away from the main entrance.

Criterion 4: Fire Service Access and Equipment

The building fronts directly onto Sylvan Avenue, providing unrestricted access for fire appliances. The main entrance is immediately visible and accessible from the public highway.

Key points:

- Fire appliances can stop directly outside the building
- No obstructions or barriers to entry
- Standard hose reach is sufficient for both floors
- No works affect fire service access

The new side alleyway does not obstruct fire service access.

Criterion 5: Robust Strategy for Evacuation

The evacuation strategy is simultaneous evacuation, appropriate for small HMOs.

All occupants will exit via the protected internal staircase to the main entrance. Management responsibilities include:

- Providing tenants with written fire-safety instructions
- Maintaining clear escape routes
- Ensuring fire doors remain self-closing and unobstructed
- Regular testing of alarms and emergency lighting

3. Ongoing Maintenance

The property will be professionally managed at all times. This includes:

- Weekly fire alarm tests
- Monthly emergency lighting checks
- Annual Gas Safety certification
- Five-year Electrical Installation Condition Report (EICR)
- Regular inspections of fire doors and closers
- Maintenance of extinguishers and fire blankets

All fire-safety equipment will be kept in full working order, and records will be retained by the managing agent.

4. Declaration of Competence

I, Kate Wadeson, acting as a Planning Consultant for Prestige Planning Ltd, declare that I am a competent person to provide this Fire Safety Strategy. This statement has been prepared based on professional experience in planning and residential conversions, with specific reference to the requirements for small Houses in Multiple Occupation (Class C4) and the fire-safety standards set out in London Plan Policy D12.

The strategy is proportionate to the scale and complexity of the proposed change of use at 49 Sylvan Avenue.

Signed: *Kate Wadeson*

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