Advice to the local planning authority

Advice to the local planning authority (LPA) from the Building Safety Regulator (BSR) as a statutory consultee for developments that include a relevant building.

To LPA	Haringey
LPA planning ref no	HGY/2026/3003
Our ref	26-1227
Site address	Former Cannon Factory site, Ashley Road, London, N17 9LZ
Proposal description	Full planning permission for a phased mixed-use development comprising: (i) enabling works and operations; (ii) hotel (Use Class C1); (iii) purpose-built student accommodation (Sui Generis); (iv) commercial floorspace (Use Classes Eg); and (v) site-wide and/or phase-specific access, servicing, public realm, blue-badge parking, cycle parking, open space, hard and soft landscaping, utilities, plant and all other associated works.
Date on fire statement	30/10/2026 – Issue 02
Date consultation received	16/11/2026
Date response sent	26/11/2026

1. Substantive response for the local planning authority

Thank you for consulting the BSR about this application.

Headline response from the BSR
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Scope of consultation

1.1. The above application relates to a phased mixed-use development comprising a hotel, purpose-built student accommodation (PBSA) and commercial floorspace.

1.2. The ‘Cover Letter’ (dated 30/10/2026) describes the proposal as a scheme comprising two buildings: a part 2-, part-8, part-11 storey hotel building in the west of the Site comprising 162 rooms and associated ground floor uses; and a part 2-, part 8-, part-11

and part 27- storey PBSA building comprising 478 PBSA beds and 703sqm of commercial floorspace.

1.3. The Cannon Factory project comprises the development of a new mixed-use scheme, which consists of two buildings (Blocks A & B).

- **Block A**: 11-storey (G+10) building, designed as a hotel block with a height of approx. 33m.
- **Block B**: 27-storey (G+26) building, designed as a student housing (PBSA) block with a height of 82m and commercial areas at L00 and L01. Block B steps back at L08 and L11.
- Summary of the use of each storey in Block B
  - 00 Commercial, amenities, ancillary areas
  - 01 Commercial, amenities, ancillary areas, cycle stores
  - 02 Communal terrace, amenities, studio flats, cluster accommodation, KLD
  - 03-10 Studio flats, cluster accommodation, KLD
  - 11 Communal terrace, studio flats, cluster accommodation, KLD
  - 12-25 Studio flats, cluster accommodation, KLD
  - 26 Amenities, communal terrace
- The two blocks are completely detached from each other, each with an independent structural frame, foundations, and external wall curtilage with a physical gap provided between them.

1.4. Regarding Block A, section 7 of the fire statement states: *"**Block A is an 11-storey hotel** (G+10). This is **not classified as a higher-risk building** (HRB) under the building safety act (BSA) by way of its use and height. It **is structurally independent from the adjacent Block B** (which is an HRB) where **each block has its own separate structural frame and foundations**. The blocks do not share any escape routes and **there is a gap between the two external wall systems where the two buildings do not share facades**."*

1.5. Accordingly, Block A (hotel) is not a relevant building but may be within the curtilage of the relevant building. The BSR has limited its assessment of the non-relevant residential building to matters which may impact on fire safety in the relevant building such as fire service access and external fire spread.

1.6. The fire statement dated 30/10/2026 states that the adopted fire safety design standards for Block B are BS 9991 and BS 9999. The principal design document for the hotel is Approved Document B Volume 2. The BSR has assessed this application on that basis.

Consultation

1.7. Regarding fire service facilities and also the means of escape for Block B (PBSA), section 7 of the fire statement states*: "**Block B will feature 1x firefighting shaft and 1x evacuation stair**, and a total of 3x dual-purpose firefighting and evacuation lifts serving the PBSA areas. The building also features **a two-storey commercial demise that is fully separated** from the adjacent student residential areas and their respective ancillary spaces."* Separately, the commercial demise is served by a single stair and an evacuation lift.

1.8. Additionally, and relating to Block B (PBSA), section 12 of the fire statement states: "***Access for fire appliances will be provided within 18 m of the firefighting shaft entry point*** *and* ***within line of sight of the wet riser infill point*** *where provided with a wet riser as recommended in BS 9991:2024."*

1.9. Following a review of the information provided in the planning application, the BSR is content with the fire safety design as set out in the project description, to the extent it affects land use planning considerations. However, the BSR has identified some matters as supplementary information, set out below, that the applicant should try to address, in advance of later regulatory stages.

2. Supplementary information

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

Block B - Studios

2.1. Paragraph 2.2.3 of the London Plan fire statement states: *"**Where the escape route** from a separate habitable room **is through a living area containing a kitchen that is not located within a separate enclosure**, the following recommendations should be met:*

- *A sprinkler system…*
- *A Category LD1 fire detection and fire alarm system…*
- *The **edge of the cooking apparatus should be not less than 1.8 m away from an escape door**, a door to an adjoining habitable room or a means of escape route to an escape door.*
- ***All egress routes** from habitable rooms to the escape door from the apartment **should be not less than 0.9 m in width**. No fixed obstructions (such as radiators or cupboards) should be located within the 0.9 m escape route.*
- *A **gap of 0.3 m should be provided between the leading edge of the exit door** from the space containing the cooking facility and the 1.8 m zone from the cooking apparatus, to allow people with mobility impairments to access the door hardware."*

2.2. The BSR has been unable to assess the internal layout of the studios within Block B (PBSA). Accordingly, it will be for the applicant to demonstrate at later regulatory stages that radiant heat, smoke toxicity, visibility and human behaviour factors do not compromise the means of escape for occupants. If the applicant is unable to demonstrate that escape routes can be safely and effectively used, they should discuss the materiality of design changes to planning considerations with the LPA.

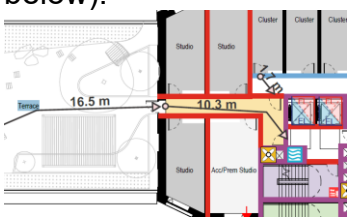
Block B: Roof terrace – Level 02

2.3. The 'Level 02 Plan' and also the 'APPENDIX A - FIRE SAFETY MARK-UPS' in the London Plan fire statement (see excerpt below) show access to the roof terrace is by way of the 'Amenities' ancillary area.



2.4. The cited fire safety standard states that single-direction escape routes from a terrace should be into either:
a) a protected stairway; or
b) a protected corridor meeting the recommendations for travel distance.

2.5. It is noted that the Level 11 terrace escape route is into a protected corridor (see excerpt below).



2.6. If design changes are subsequently required for Level 02, in this instance, this may be achieved by way of internal alterations and may not affect land use planning considerations. However, it will be for the applicant to demonstrate compliance at later regulatory stages and the applicant should seek the advice of the LPA about the materiality of any proposed design changes, if required.

Smoke ventilation system

2.7. Section 7 of the fire statement states: *"The **building will employ a mechanical smoke ventilation system in all residential corridors and ancillary connections to residential escape routes** All mechanical smoke ventilation systems (extract shafts and inlet air shaft) have shafts suitably sized to cater to the building height and to afford protection to the evacuation lifts. **All mechanical smoke ventilation systems will be substantiated using CFD modelling in the subsequent stages of design**. Additional fansets are considered for the inlet air shafts to support the system due to the building's height and potential for being subject to climatic effects."*

2.8. The BSR acknowledges the applicant's comments regarding the proposed substantiated CFD modelling. Accordingly, it will be for the applicant to demonstrate that appropriate means of escape are provided at later regulatory stages. However, if the CFD modelling does not support the design, any subsequent redesign may affect land use planning considerations and the applicant should seek the advice of the LPA about the materiality of any proposed design changes, if required.

Fire service access - Hotel

2.9. Regarding fire service access to Block A (Hotel), the London Plan fire statement 'APPENDIX A - FIRE SAFETY MARK-UPS' Ground Floor Plan states*: "Due to proximity*

*of the south elevation to the site boundary, **a pump appliance cannot be assumed indefinite access into the rear courtyard for direct access to the FF shaft**. As such, it is **recommended that the dry riser inlet point is located along the south external wall of the hotel to be within 18m of the FRS vehicle access route**. This location supports a simple horizontal piping route to the vertical main. Though this is not directly at the FF shaft entrance, it is considered to be in close proximity to this and where signage directing firefighters to the dry riser and FF shaft entrance is recommended to be provided on the south-west elevation of the hotel."*

2.10. The BSR acknowledges the applicant's comments regarding fire service access to Block A (Hotel) and it will be for the applicant to demonstrate compliance at later regulatory stages. However, if design changes are subsequently required, the applicant should seek the advice of the LPA about the materiality of any changes to land use planning considerations, e.g. landscaping and access arrangements .

PV panels / Green roofs

2.11. Section 7 of the fire statement states: "*The building will have the potential to feature PV panel arrays on roofs and green roofs which will be designed to the latest guidance in BS 9991, DCLG/GRO green roof guides, and with recommendations from RC62*."

2.12. The BSR acknowledges the applicant's comments. Accordingly, it will be for the applicant to demonstrate compliance at later regulatory stages.

Yours sincerely

Stephen Gallagher
Stephen Gallagher
Fire Safety Information Assessor

Guidance on Planning Gateway One is available on the Planning Portal: Planning and fire safety - Planning Portal.

The scope of this substantive response is limited to fire safety matters that are material to land use planning considerations. This does not include matters relating to the determination of an application for:

- **building control approval,**
- **a completion certificate, and**
- **a building assessment certificate.**

This response does not provide advice about compliance with London Plan or local plan policy.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