

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/2023/2137
Our ref	pgo-4236
Site address	Tottenham Hotspur Stadium, 748 High Road, Tottenham, London N17 0AL
Proposal description	Minor Material Amendments to height, design, maximum floorspace and associated works to Plot 3 (Hotel / Residential development) of the hybrid planning permission HGY/2015/3000 (following previously approved amendments including HGY/2017/1183 to allow part residential (C3) use on Plot 3) for demolition and comprehensive redevelopment of the Northumberland Park Development Project through variation of Conditions A4 (Consented Drawings and Documents); A6 (Conformity with Environmental Statement) and Condition A7 (Maximum Quantity/Density) and D1 (Plot 3 specific drawings) under Section 73 of the Town and Country Planning Act (EIA development) (PLEASE NOTE THAT THIS IS A 14-DAY RE-CONSULTATION FOLLOWING RECEIPT OF AMENDED REORIENTATION OF MASSING AND SCALE OF THE TOP PARTS OF THE PROPOSED BUILDING AND AN INCREASE IN FLOORSPACE / RECONFIGURATION OF FLOORSPACE (ADDITIONAL 945sqm) WITHIN THE PROPOSED HOTEL AND RESIDENTIAL LAYOUT, IN CONJUNCTION WITH ASSOCIATED OTHER NON-MATERIAL AMENDMENTS)
Date on fire statement	25/10/2023 (Update)
Date consultation received	01/11/2023
Date response sent	24/11/2023

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. It is noted the above application relates to Minor Material Amendments to height, design, maximum floorspace and associated works to Plot 3 (Hotel / Residential development) of the hybrid planning permission HGY/2015/3000.
- 1.2. 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.
- 1.3. The 'Gateway 1 Fire Form Update' (dated 25/10/2023) states the following:
 - NDP Hotel is a 31 storey (plus basement), mixed-use building with a height of 107.9m.
 - Ground to Level 13 - hotel inc ancillary and amenity areas.
 - Level 14 - residential ancillary and amenity areas
 - Levels 15-29 - of residential accommodation.
 - Levels 29-32 - residential duplexes
 - Levels 31-32 – roof top plant
- 1.4. Section 4 of the fire statement states: *"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.**"*

- 1.5. The updated fire statement (25/10/2023) states that the adopted fire safety design standards are BS 9991 and BS 9999. HSE has assessed this application on that basis. However, Section 3.2 of the (London Plan) fire statement states: *“Fire engineering principles may be employed to support alternative solutions where strict adherence to the codes would conflict with the wider aspirations for the scheme. Departures from guidance of BS 9991:2015 are identified and alternative proposals are documented.”* It is noted the fire statement(s) were helpfully detailed and informative.

Consultation

- 1.6. Section 7 v) of the fire statement states: *“Following the recent... 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... 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 lifts.”*
- 1.7. Section 2 of the fire statement update document states: *“There are four primary stairs serving across the building, with two stairs serving the hotel portion of the building, and two separate stairs serving the residential portion of the building. **Three of these stairs will serve down to the shared landlord plant and ancillary spaces at basement level, which includes a car park,** and one additional escape stair will be provided which solely serves this basement plant and ancillary level accessed from L01 off the podium.”*
- 1.8. 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. However, HSE 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 HSE’s substantive response and should not be used for the purposes of decision making by the local planning authority.

Means of escape

- 2.1. Section 7 i) of the statement states: *“The building contains both residential and commercial use areas. However, means of escape between the commercial occupancies and residential occupancies shall be separate.”*
- 2.2. This is noted and it will be for the applicant to demonstrate compliance at later regulatory stages. Additionally, HSE notes and welcomes the applicant’s commitment (paragraph

1.4) for any future consultation with HSE and LFB to inform the design. The following supplementary comments should be considered in that context.

- 2.3. Section 7 ix) of the fire statement states: *“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.”*
- 2.4. As acknowledged by the applicant, the cited fire safety standards state at least two fire-fighting shafts should be provided in buildings with a storey of 900 m² or more in area. Accordingly, HSE agree that the hotel should be provided with an additional firefighting shaft. It is noted that the elements of a firefighting shaft appear to be provided (see paragraph below) on all hotel storey levels and HSE cannot see any impediment to the creation of a second firefighting shaft.
- 2.5. In reference to paragraph 2.4., section 8.3.1 of the (London Plan) fire statement states: *“In addition to the above, the second stair core serving the hotel levels, although not designed as a firefighting shaft, will be a protected stair core which is to have a wet riser provided and smoke ventilated lobby at all levels, to support firefighting operations.”*
- 2.6. In this instance, given the provision of the second staircase and its proximity to the nearest lift(s), design changes necessary to provide an additional firefighting shaft including a firefighting lift, are unlikely to affect land use planning considerations. However, it will be for the applicant to demonstrate compliance at later regulatory stages.

QDR

- 2.7. The fire statement (section 7 ii) states: *“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.”*
- 2.8. This is noted. It will be for the applicant to demonstrate compliance at later regulatory stages.

Smoke ventilation / CFD

2.9. Section 7 v) of the fire statement states: *“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.”*

2.10. This is noted and it will be for the applicant to demonstrate compliance at later regulatory stages.

Open plan layout

2.11. Section 7 vi) of the fire statement states: *“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.”*

2.12. This is noted and it will be for the applicant to demonstrate compliance at later regulatory stages.

Sprinkler system

2.13. Section 7 viii) states: *“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.”*

2.14. This is noted and HSE welcome the increased category specification. However, it will be for the applicant to demonstrate compliance at later regulatory stages.

Hose laying distances / basement

2.15. The Design and Access Statement (8.3.2) states: *“The only exception the above is the basement level, where there is an extended distance to reach the plant at the north portion of the basement. To support this an additional dry riser was introduced to the northernmost stair serving this space. However, there are still areas that fall behind this 45m limit, this approach will be subject to discussion and formal agreement with the approval authorities. It is noted that these spaces served by the extended distances, are only associate with low-risk water plant for the building”*

2.16. This is noted, however, as stated by the applicant this extended distance falls outside the cited fire safety standard. 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](#).

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