

Haringey Planning Authority  
Planning, Regeneration & Economy  
Level 6  
River Park House  
Wood Green  
N22 8HQ

The London Fire Commissioner is the  
fire and rescue authority for London

Date 2<sup>nd</sup> February 2024  
Our Ref 31/010217  
Your Ref HGY/2023/2306

Dear Sir/Madam

## **RECORD OF CONSULTATION/ADVICE GIVEN**

### **TOWN AND COUNTRY PLANNING ACT 1990**

**SCOPE OF WORKS:** 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.

**PREMISES ADDRESS:** 819-821 HIGH ROAD TOTTENHAM LONDON N17 8ER

#### **DOCUMENTS REVIEWED:**

Fire Strategy (BB7, 15170BC, Version 03, 11/08/2023)  
Gateway One Fire Statement (BB7, 15170BC, Version 04, 22/08/2023)

#### **PLANS REVIEWED:**

PRINT-F3A-ZZ-00-GA-A-82127 Rev A2.P1  
PRINT-F3A-ZZ-01-GA-A-82128 Rev A2.P1  
PRINT-F3A-ZZ-02-GA-A-82106  
PRINT-F3A-ZZ-03-GA-A-82130 Rev A2.P1  
PRINT-F3A-ZZ-04-GA-A-82131 Rev A2.P1  
PRINT-F3A-ZZ-05-GA-A-82132 Rev A2.P1  
PRINT-F3A-ZZ-06-GA-A-82133 Rev A2.P1

The London Fire Commissioner (the Commissioner) is the fire and rescue authority for London. The Commissioner is responsible for enforcing the Regulatory Reform (Fire Safety) Order 2005 (The Order) in London.

London Fire Brigade (LFB) has been consulted with regard to the above-mentioned premises and makes the following comments/observations:

We note that the documents on the portal include plans for building numbers 819, 821 and 823, which are included in the scope of the planning application. However, no reference to these is made within the fire strategy document. Therefore, we have not been able to conduct a full review of the proposals. The only documents and plans reviewed as part of this response are those listed in the sections immediately above. We reserve the right to make further comment on all blocks through any subsequent advice request/consultation.

### **Fundamental concerns relating to single stair for Core B**

1. We note that the design includes one or more tall residential buildings relying upon a single staircase. We draw your attention to the announcements from government stating their expectation that multiple staircases will be required in residential buildings above 18m. Whilst we note that transitional arrangements will apply, it is the National Fire Chiefs Council (NFCC)'s position, as stated in the December 2022 NFCC 'Single Staircases Policy Position Statement' that all residential buildings over 18m or seven storeys in height should be provided with multiple staircases.

Design teams and developers should also be planning for the new requirements under the Building Safety Act for in scope buildings once occupied, including the need to provide a safety case review. The design as currently proposed may have implications on those responsible for demonstrating the ongoing safety in the building.

### **Evacuation lifts**

2. Furthermore, in relation to point 1 above regarding the provisions to support vertical evacuation, we note the proposal to include an evacuation lift, however there should be sufficient numbers of evacuation lifts provided so that if an evacuation lift is out of service (e.g., as a result of breakdown or maintenance), there is at least one that is still available for use from all areas of the building. Therefore, we question how London Plan 2021 Policies D5 and D12 have been met in this regard.

### **Ground floor layout**

3. For some cores it appears that occupants escaping from the upper floors are required to travel through the lift lobby to reach a final exit. This is not in accordance with guidance on the route to the firefighting stair at ground floor. We make further reference to figure 20 of BS 9999 on this point and expect that further consideration will be given to the ground floor layout.

### **Studio Apartments Cooking Hob Locations**

4. Whilst we appreciate that this application is at an early stage of design and that the design of the building may change, we note that the proposal is to include open plan internal flat arrangements where the kitchen and in particular the cooking appliance is positioned in close proximity to the internal escape route and the flat entrance door. Guidance (ADB V1 paragraph 3.18 and BS 9991:2015, clause 9.1) recommends that cooking facilities are remote from the main entrance door and located in such a way that they do not prevent escape if they are involved in a fire. In this case, we note that the location of the cooking appliance is close to the door and that an assessment has been carried out in the form of a radiated heat analysis, in order to demonstrate its suitability. While we acknowledge that this is primarily a matter for the

approving authority, it is our view that other factors should have been considered in the assessment, some of which are detailed in a – e below:

- a. the human behaviour e.g. willingness to pass a fire;
- b. the (accumulated) radiated heat, toxicity and time period for which they will be exposed;
- c. the potential fire spread;
- d. the visibility conditions;
- e. the requirement for an early warning of a fire which meets the recommendations of BS 5839 part 6 with regards to the inner room protection e.g. a smoke detection should be positioned in all access rooms and along the means of escape.

It is therefore our opinion that any analysis carried out should include the above factors and suitably demonstrate to the approving authority that the facilities are remote from the main entrance door and do not impede the escape route from anywhere in the flat.

### **Roof Terraces**

- 5. Whilst we appreciate that this application is at an early stage of design and that the design of the building may change, we are concerned with the lack of detail contained within the strategy regarding the communal use terraces, particularly their link into common corridors serving flats, where an evacuation signal indicating smoke has been detected within the escape corridor serving these communal/amenity spaces is insufficient. Additionally, the conflicting evacuation strategies, i.e. stay put for the flats and simultaneous evacuation for the roof terraces has not been suitably addressed. Furthermore, this arrangement is proposed to simultaneously evacuate into a single stair which is significantly taller than the general height limitation for a simultaneous evacuation strategy (i.e., 11m), and this has not been suitably addressed in the fire strategy. We would expect this to be further justified at the Building Regulations Stage.

### **Cycle Storage**

- 6. The proposals include a cycle storage area. It is our opinion that consideration is given to the storage (and potential charging) of electric bikes and electric scooters and the potential fire risk posed by these electric powered personal vehicles (EPPVs) which may be located within these areas. There is increasing evidence showing that EPPVs can spontaneously ignite and burn for long periods so there is an increased potential for toxic gases/smoke/fire spread. It is therefore our recommendation that adequate automatic fire suppression and smoke control systems for the area are necessary. As such storage would be deemed an ancillary area, we are of the view that it should be provided with a ventilated lobby in accordance with the recommendations given in clause 32 of BS 9991:2015.

### **Photovoltaic Cells**

- 7. We note that a significant number of photovoltaic cells are to be installed. Care should be taken to ensure that these are installed correctly to the manufacturer's recommendations due to concerns that have come to light in regard to the fire hazards associated with poorly fitted installations. We recommend that 'arc-fault' protection is fitted if possible, and request that it is clarified whether there is any access (e.g. for maintenance) to the areas where the cells are situated.

It is our expectation that suitable isolation controls will be provided for use by firefighters. These controls should be accessible to firefighters and provided with suitable local signage to identify their location. The location of isolation controls should also be shown on premises information plans provided in a Secure Information Box or equivalent operational/emergency information pack provided for fire and rescue service use, as appropriate.

Any queries regarding this letter should be addressed to [FSR-AdminSupport@london-fire.gov.uk](mailto:FSR-AdminSupport@london-fire.gov.uk). If you are dissatisfied in any way with the response given, please ask to speak to the Team Leader quoting our reference.

Yours faithfully,

A handwritten signature in dark ink, appearing to be 'C. Bailey', written in a cursive style.

Assistant Commissioner (Fire Safety)

**The London Fire Brigade promotes the installation of sprinkler suppression systems, as there is clear evidence that they are effective in suppressing and extinguishing fires; they can help reduce the numbers of deaths and injuries from fire, and the risk to firefighters.**