

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	HGY20242279
Our ref	pgo-5786
Site address	25-27 Clarendon Road Off Hornsey Park Road, Wood Green, London, N8 0DD
Proposal description	Demolition of existing buildings and delivery of a new co-living development and affordable workspace, alongside public realm improvements, soft and hard landscaping, cycle parking, servicing and delivery details and refuse and recycling provision.
Date on fire statement	23/07/2024
Date consultation received	28/08/2024
Date response sent	16/09/2024

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. The above application relates to the construction of a 9-storey building above ground providing workspace and 222 co-living studios.
- 1.2. The building contains 9-storeys (plus basement) with a height of 25.3m.
- 1.3. Co-living communal areas will be present at the Ground, First, and Eighth Floors.

- 1.4. Regarding the communal areas, paragraph 2.2.3 of the London Plan fire statement states:
- 8th Floor lounge
 - 1st Floor overall Dining / Kitchen / Amenity Terrace area
 - 1st Floor Cinema and Evening Terrace area: total of no greater than 60 people at any one time.
 - Ground Floor Workspace
- 1.5. The fire statement dated 23/07/2024 states that the adopted fire safety design standards are BS 9991 and BS 9999. HSE has assessed this application on that basis. It is noted the fire statement was helpfully detailed and informative.

Consultation

- 1.6. Section 7 of the fire statement states: *“As the building features residential occupied floors at greater than 18 m above ground level, two common stairs are provided based on the revised ADB1 guidance issued in March 2024.”*
- 1.7. HSE welcomes the provision of two stairs within the building.
- 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.

Fire service access and facilities

- 2.1. Section 10 of the fire statement states: *“The internal firefighting features are informed by the expectations of BS 9991, including a single firefighting shaft where the building has an area of less than 900 m² at each floor level above 18m in height..”,* with paragraph 6.4.2 of the London Plan fire statement stating: *“As no floor at greater than 18 m in height exceeds 900 m², a single firefighting shaft will be provided...”*
- 2.2. Whilst it is acknowledged that the building has a stated floor area of ‘less than 900 m² at each floor level above 18m in height’, floor plans appear to indicate that is only slightly less than 900m².
- 2.3. This is noted; however, the floor plans also show a travel distance from the firefighting stair to the furthest flat entrance door of approximately 36m.
- 2.4. For information, the ‘Smoke Control Association. Guidance on Smoke Control to Common Escape Routes in Apartment Buildings Flats and Maisonettes’ (SCA), states that single direction travel distances over 30m in length (measured from the firefighting

staircase door to the furthest flat entrance door) in common escape routes are considered to present onerous conditions for firefighters.

2.5. Additionally, the SCA Guidance states:

- firefighting from long corridors can present exceptionally onerous conditions for firefighters.
- the corridor itself can become the fire compartment once the flat front door is either breached by the fire, opened by escaping residents or by firefighters
- charging that hose with water prior to entering the corridor
- **In our experience, corridor lengths over 30m may simply be too long for safe firefighting operations** and we therefore advocate for this limit to be in place.

2.6. Furthermore, the same document states: *‘Whilst 30m might seem like an arbitrary figure to some, firefighting from long corridors can present exceptionally onerous conditions for firefighters. **Essentially, the corridor itself can become the fire compartment once the flat front door is either breached by the fire, opened by escaping residents or by firefighters.***’

2.7. However, it is noted that a means of escape staircase (provided with evacuation lift but not designed as a firefighting shaft) is available at the southernmost part of the building.

2.8. In this instance, if the means of escape stair (provided with an evacuation lift) was amended to become a firefighting shaft (provided with a firefighting lift and fire main), this would be unlikely to affect land use planning considerations and would resolve the travel distance issue described above. This will be a matter for the applicant to decide and also to demonstrate compliance at later regulatory stages.

Fire service access / basement access

2.9. Paragraph 3.5.2 of the London Plan fire statement states: *“The plant area at basement level will feature a maximum occupancy of less than 10 people, and a single direction of escape is considered sufficient. The area will have infrequent maintenance access **via an access hatch and ladder**, meeting the guidance in Section 26 of BS 9991.”*

2.10. Paragraph 3.5.3 of the same document states: *“The sprinkler room and basement plant rooms will be inner rooms to the plant area at Ground floor. This is considered suitable where access via the hatch would be restricted to building management staff, and where automatic detection and alarm would support early warning to the inner rooms. The access room is not considered to be a place of special fire hazard, where equipment in these areas will not featuring combustion processes or flammable fuels.”*

2.11. Additionally, paragraph 6.5.1 states: *“The proposed basement has an area of less than 200 m². As such and in accordance with Section 14.2.1.3.1 of BS 9991, **no means of basement smoke clearance system are expected.**”*

2.12. The above is noted, however, it would appear that the sprinkler room is an inner, inner room. Additionally, **HSE advises that consideration is given to fire service access and smoke clearance for firefighting operations** – this includes stop valves, which

should be installed in readily accessible positions in or near the zone they control. This matter will be for the applicant to decide and also demonstrate compliance at later regulatory stages.

Means of escape / evacuation alert system

2.13. Paragraph 3.2.9 of the London Plan fire statement states: “An evacuation alert system to BS 8629 [9] is not expected, where full evacuation of the wider building may be initiated using the BS 5839-1 detection and alarm system.”

2.14. This is noted, however, BS 8629 (Introduction) states: “**It is important that evacuation alert systems for use by the fire and rescue service are not confused with (or integrated with) fire detection and fire alarm systems.** It is acknowledged that the technology exists to provide the evacuation alert systems to which this British Standard refers within a fire detection and alarm system which might be present to support other safety functions, such as smoke control. **However, the reason for the avoidance of such an integrated arrangement within the recommendations of this British Standard is to avoid confusion between fire and rescue service evacuation alert systems and fire detection and alarm systems** until the concept, use and management of the former systems is well established and understood. Such confusion could result in inappropriate use of fire detection systems in blocks of flats, so undermining a stay put strategy and resulting in incorrect programming of integrated systems. It is intended that, given that evacuation alert systems are a new form of system, not commonly used within the UK, this British Standard will be reviewed two years after its publication, at which time the recommendations for avoidance of any integration with other systems will be reviewed.”

2.15. Whilst, in this instance, this matter is unlikely to affect land use planning considerations, it will be for the applicant to demonstrate compliance at later regulatory stages.

Means of escape / Internal layout of flats

2.16. Paragraph 3.3.2 of the London Plan fire statement states: “Cooking facilities are to be situated away from the flat entrance door(s) and internal escape routes. It is recommended that a distance of at least 1.8 m be provided between the cooking appliance at escape route, **In the event that narrower escape routes should be present**, these would be subject to discussions with the authorities having jurisdiction regarding suitable measures to mitigate fire risk during cooking. Risk mitigation measures that may be considered would include:

- Use of smaller (two ring) induction hobs with automatic timers.
- Inclusion of automatic cut-offs linked to the fire detection system.
- Provision of fire blankets.
- Provision of hob suppression.”

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

Means of escape / workspace

2.18. The ground floor plan shows: *“Note: Workspace fitout not shown, to be divided into compartments <100sqm for fire strategy”*.

2.19. This is noted and 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