

Dear Planning and Building Control of Haringey LPA,

RE: Objection to Planning Application HGY/2024/0921 - Fire Statement Form
Inaccuracies and Inconsistencies

I am writing yet again to strongly object on material and policy grounds to the planning application HGY/2024/0921. This time I am compelled to highlight further critical application inadequacies brought out by the long required "Fire Statement Form" prepared by Paul Brown. It is dated 7 November 2025, but has been uploaded to the planning portal on November 17, 2025.

My objection is based on the incompatibility between the Fire Statement and the proposed planning drawings, as well as several factual errors within the Fire Statement itself. These discrepancies render the current submission unviable for proper assessment and demonstrate that the scheme, as drawn, is unbuildable.

1. Omission of Automatic Water Fire Suppression System (AWFSS) Infrastructure & Structural Consideration

The Fire Statement explicitly confirms that "An Automatic Water Fire Suppression System (AWFSS) is to be provided in each new apartment in accordance with **BS 9251:2021 for a Category 2** system design".

The planning drawings do not make any provision for the necessary plant rooms typically required for this system. This is not a minor detail that can be conditioned; it represents a major structural load that the current design does not objectively appear to support.

- **Tank Volume & Space:** The specified AWFSS designed to BS 9251:2021 Category 2 system requires a 30-minute run time. Even with a standard 2-head sprinkler calculation per flat, this necessitates a stored water volume of approximately **3,000 to 4,500 Litres**. Assuming the system is shared, this requires a dedicated plant room with a footprint of approximately 3-4m² plus space for inspection and pumps and other equipment. While it is understandable that the detailed layout and design of the system has not been carried out yet, it is not acceptable that the current floor plans show no viable allocated space for this necessary equipment.
- **Structural Load & Buildability:** A 4,000-litre tank and equipment exerts a static dead load of approximately **4.2 metric tonnes**. Placing this weight on a previously extended Victorian 4th-storey structure requires **significant** structural steel reinforcement. We previously submitted a structural report by Akera Engineers (dated 2 May 2024) which confirmed that the existing timber roof structure is incapable of supporting the new accommodation and that the applicant's proposed "shallow floor build-up" (approx

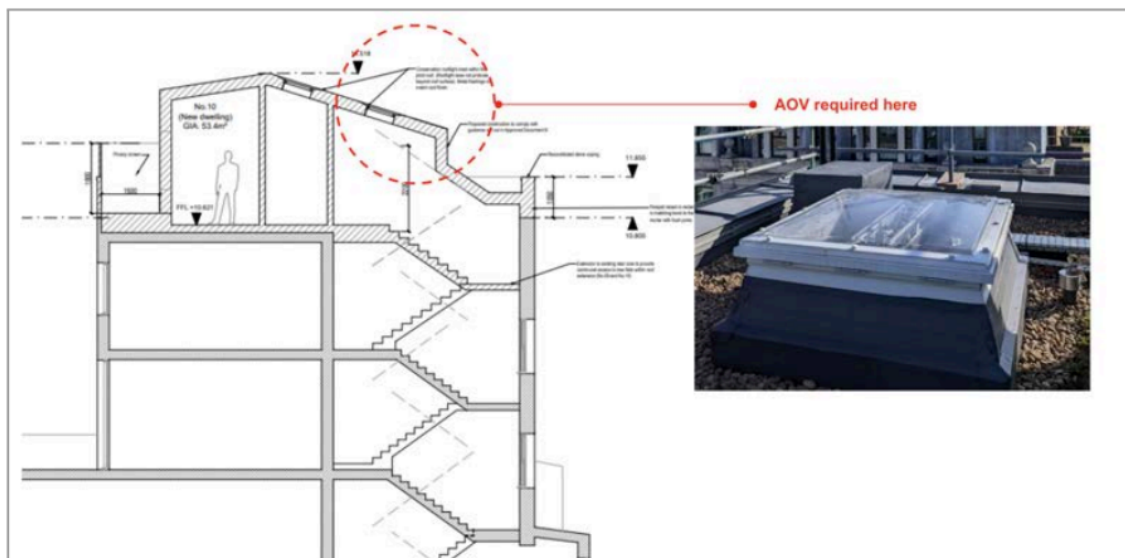
150-200mm) is insufficient even for standard residential loading. Adding a **4.2-tonne water tank in a small area** to this structure exacerbates this issue dramatically. To support this load, the floor build-up would need to increase significantly. The applicant's persistent claim of a shallow build-up viability has become not just optimistic, but arguably dangerous and fantastical unless demonstrated otherwise by competent structural engineers.

- This is a material planning consideration and needs to be addressed now as any increase in floor build up will affect the external prominence of the structure in the conservation area and even further reduce the already unacceptable cramped quality of proposed accommodation.

2. Automatic Opening Vent (AOV) Not Shown

The Fire Statement Form confirms that "A new Automatic Opening Vent (AOV) is to be provided at the head of the stairs". This is necessary for the evacuation strategy of flats at a height >11m.

- **Repeated Omission:** We have highlighted the necessity of this safety equipment and its absence from the plans and section and elevation drawings on multiple occasions, specifically in our objection letters dated **23 May 2024, 10 March 2025, 23 May 2025, and 5 August 2025**. It is unacceptable that 20 months later, this mandatory feature is still not shown in the planning drawings.
- **Impact:** A fire AOV is **not discrete**; it protrudes significantly above the roofline, as pointed out before. As this is within the Crouch End Conservation Area, the planning drawing must be updated to show the AOV and the visual impact of this protrusion must be assessed prior to determination. It cannot be assessed if it is not drawn.



3. Dry Rising Mains Omissions

The Fire Statement indicates a Dry Rising Mains is to be provided, with an inlet within 18m of the fire appliance parking on Haringey Park. The current planning drawings do not show the dry riser inlet box on any elevation or plan. The design also does not show any pipework or outlets that are required on every landing of the staircase. This necessary safety element is completely missing from the design proposals and its viability cannot be established. It is also unclear if only one staircase or both staircases will require the Dry Rising Mains. Either way - it is clear that the suitably placed new external metal inlet box on the front Victorian facade / wall is a material change in a Conservation Area and needs to be shown.

4. Factual Errors, Omissions and False Assumptions

The applicant's Fire Statement contains several critical inaccuracies and unverified assumptions:

- **Balcony Misrepresentation:** The Statement incorrectly claims there are "no balconies" proposed for the new top floor, directly contradicting the submitted plans which clearly show proposed balconies for both units.
- **Chimney and Flue Safety:** The assertion that there are "no identified issues which may affect fire safety" is false. The design positions the new structure dangerously close to multiple active fireplaces and flue openings with insufficient extended chimney heights, which is in contravention of Building Regulations Approved Document Part J.
- **Omission of Power Storage:** The Statement fails to mention the proposed power storage facilities for the North Facing PVs to be housed on the top floor, demonstrating compliance with PAS 63100:2024 requirements.
- **Unverified Fire Strategy Foundation:** The applicant's fire strategy fundamentally relies on all existing flats having "Protected Entrance Hallways opening onto the Protected Stairs." Residents confirm no qualified surveys of the existing flats have been conducted by the applicant, and the applicant's drawings—prepared from inaccurate estate agent plans—fail to demonstrate the actual existence of these crucial protected entrance hallways, which form the basis of the entire fire safety and compartmentation plan.

Conclusion

The Fire Statement mandates significant physical infrastructure (4-tonne water tanks, AOVs, Dry Risers, Protected Lobbies) that is entirely missing from the planning drawings.

It is physically impossible to construct the scheme as drawn while complying with the safety requirements and commitments set out in the applicant's Fire Statement Form. The addition of a 4.2-tonne load confirms and exacerbates our previous objection prepared by Akera

Engineers: the proposed structural build up is inadequate, and the design is unbuildable without materially changing the height and bulk of the roof.

For the reasons above I once again request you reject this planning application due to factual errors, omissions and complete failure to demonstrate the viability of the proposed accommodation and associated plant. Should you judge that after 20 months and multiple design re-iterations since this application has been submitted it is still salvageable, I urgently request that you compel the applicant to:

1. Revise the Fire Statement to correct the factual errors regarding balconies, power storage facilities and chimneys.
2. Once more, request an update to the design and all planning drawings to accurately show the viability, locations and material impact of AWFSS plant rooms, the AOVs protrusion, and the Dry Riser inlet and pipework so their impact on amenity, structure, and the Conservation Area can be assessed prior to the determination.
3. Seek accurate and up-to-date existing flats' survey drawings to ensure the assumptions underpinning the Fire Statement of the building are valid.

Many thanks,

Will Chan