

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	Camden
LPA planning ref no	2022/3705/P
Our ref	pgo-4906
Site address	Barrie House 29 St. Edmunds Terrace, London, NW8 7QH
Proposal description	Erection of one additional storey to provide 1 residential unit on the roof of the residential block of flats including 2 terrace areas and installation of a new plant enclosure to the roof.
Date on fire statement	26/09/2023
Date consultation received.	05/03/2024
Date response sent.	26/03/2024

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 and planning history

- 1.1. The above application relates to a proposed extension consisting of two floors above an existing building. The applicant asserts a permitted development right under Class AA of Part 20 of Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) ('the GDPO').

- 1.2. The above application relates to the extension of an existing building at roof level to add an additional floor of accommodation on to the roof of the existing block creating a penthouse flat at 8th floor level.
- 1.3. The proposed development is located at Barrie House, St Edmonds Terrace, NW8 7QH. The site is a purpose designed and built residential development circa 1960's, which comprises a H-shaped building of modern construction. It is positioned on slightly sloping ground on a corner plot at the junction of Broxwood Way and St Edmund's Terrace, London.
- 1.4. There are a total of 24 apartments across ground to seventh floor with three apartments/floor. The basement contains a storage room, electrical intake/distribution room and plant room separated from the stairs by doors to each area.
- 1.5. A single protected staircase is located at the southern end of the building, servicing the basement up to seventh floor level. The staircase is separated from each floor level by a fire door. At ground floor level the staircase is provided with two final exits. One final exit is directly from the protected staircase and the other via the entrance lobby/hallway to the stairs.
- 1.6. There is a corridor/lobby approach (two fire doors) between the existing flats and protected staircase. The penthouse entrance is positioned at the floor level below and therefore a single door onto the protected staircase.
- 1.7. The height of the top floor of the existing block, measuring from the ground floor up to the height of the 7th floor slab level (7 x 2.66m floor to floor level), is 18.62m. Due to the slight sloping ground (approx. 1m) and the additional floor being height (2.66m) the overall height of the building to the uppermost floor slab would be 22.28m.
- 1.8. Therefore, the existing premises and the proposed development are more than 18m in height.
- 1.9. The existing premises is not sprinklered. The new penthouse will be provided with a residential sprinkler system.
- 1.10. The proposed new penthouse to be provided on the roof of the seven-storey block has a finished floor height over 18m in height from the ground level, access to the rooms within flats is not possible within the 45m distance allowed. It is proposed to provide fire-fighting dry rising mains to the protected stairs in accordance with BS 9990:2015 such that hose distances from the outlets to the furthest part of the flats are within the required 45m or 60m (where sprinklered), as detailed in the "*Barrie House Fire Safety Strategy document*" section 9.2.

- 1.11. It is noted that the existing premises have a floor higher than 18 m above fire and rescue service access level, therefore the proposed development will be provided with fire-fighting shaft(s) containing a fire-fighting lift, as detailed in the “*Barrie House Fire Safety Strategy document*” section 9.5.
- 1.12. It is noted, from the information provided within the fire statement, that the adopted fire standard for this application is BS 9991:2015. This application has been assessed accordingly.
- 1.13. The fire statement states that the new development will adopt the same evacuation strategy as the existing property (remain in place /delayed evacuation strategy) and that the main fire service access and evacuation route is unchanged by the proposals.
- 1.14. It should be noted that the HM Government Building Regulations Advisory Committee (BRAC) has published correspondence regarding the provision of single staircases in tall residential buildings: [BRAC letter on safety on staircases \(publishing.service.gov.uk\)](https://publishing.service.gov.uk) This states: ‘*We discussed concerns over proposals for tall residential buildings with single staircases. **The committee shares these concerns and agrees that such proposals are highly unlikely to be able to show compliance with the current Regulations***’.
- 1.15. It will be for the applicant to demonstrate that the proposed fire safety design standard is suitable and that the proposed development complies with building regulations at subsequent regulatory stages.
- 1.16. Following a review of the information provided in the planning application, HSE is satisfied with the fire safety design, to the extent that it affects land use planning.

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 The eighth floor drawing shows access to the firefighting stair is via an open lobby area. Design changes to the internal layout of the residential accommodation may be required, however, this is unlikely to impact on land use planning considerations. It will be for the applicant to demonstrate compliance at later regulatory stages

Sprinkler Provision

- 2.2 Regarding the provision of sprinklers, the information included in the fire statement is noted. It should be noted that the Department for Levelling Up, Housing and Communities has published answers to frequently asked questions, about Approved

Document B. [Approved Document B: Fire safety - frequently asked questions - GOV.UK](https://www.gov.uk/guidance/approved-document-b-fire-safety-frequently-asked-questions)
(www.gov.uk)

- 2.3 Approved Document B ('ADB' 2019, incorporating 2020 and 2022 amendments) states that blocks of flats with a top storey more than 11m above ground level should be fitted with a sprinkler system throughout the building.
- 2.4 HSE advises that the above DLUHC FAQ response and guidance be considered, and a review of the fire risk assessment be carried out.

Note: Sprinklers should be provided within the individual flats, they do not need to be provided in the common areas such as stairs, corridors, or landings when these areas are fire sterile.

Hydrants

- 2.5 Regarding the suitability of water supply for the scale of the development proposed, the fire statement includes the response to the question about the reliance on the use of existing hydrants and whether they are currently usable/operable is given as "don't know". Whilst the response "don't know" is a valid response on the form, it is not appropriate to this development, which relies on public hydrants to feed the three proposed dry rising mains. Without knowing their location and operability, the proposal might be relying on a disused water main or faulty hydrant. Resolving this issue may affect land use planning considerations such as the design, layout, appearance, and landscape around the development if, for example, the fire appliance parking positions are to be relocated.

Yours sincerely

Gareth Underhill
Gareth Underhill
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

