

# 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.

<b>To LPA</b>	Camden
<b>LPA planning ref no</b>	2024/4953/P
<b>Our ref</b>	pgo-6191
<b>Site address</b>	33 – 35 Jamestown Road, London, NW1 7DB
<b>Proposal description</b>	Demolition of existing buildings and structures to facilitate redevelopment comprising a Purpose Built Student Accommodation (Sui Generis) block over the basement, ground, plus six storeys and seventh-floor plant room with flexible commercial (Class E) on the ground floor and a residential (Class C3) block over the ground plus five storeys. Each block has two private courtyards with hard and soft landscaping, cycle parking, and associated works.
<b>Date on fire statement</b>	10/10/2024
<b>Date consultation received</b>	11/11/2024
<b>Date response sent</b>	28/11/2024

## 1. Substantive response for the local planning authority

Thank you for consulting HSE about this application.

<b>Headline response from HSE</b>
Headline Response from HSE ('Advice to LPA' - Concern)

### Scope of consultation

- 1.1. The above consultation relates to the demolition of existing buildings and structures to facilitate the erection of a mixed-use development comprising a purpose-built student accommodation block (Sui Generis) providing 187 rooms, with flexible commercial space (Class E) at ground and basement level, and a residential block (Class C3) providing 27 homes. The site comprises:

- West Block: (Student accommodation) 7 storeys (ground + 6) with single basement storey, comprising studio flats on floors 00 (ground) – 06 with associated ancillary/amenity accommodation, including flexible space, reception, plantrooms and refuse store distributed between basement and ground, with a top floor level of 19.86m.
  - East Block: (Residential block) 6 storeys (ground + 5) with a single basement, comprising residential flats on floors 00 (ground) – 05 and duplex apartments between floor 00 – 01, with associated ancillary/amenity accommodation, including cycle store, refuse store and plant rooms distributed between basement and ground floors, with a top floor level of 16.8m.
- 1.2. West block is a relevant building and is provided with two stair cores, one of which is a fire-fighting shaft containing firefighting stair, firefighting lift and a dry riser, the other is an escape stair (protected staircase). Therefore, it is noted the building is provided with access to two stair cores for escape.
  - 1.3. East block is not a relevant building but has been included as part of HSE’s assessment as it is located within the curtilage of a relevant building. It is noted that East block is provided with a single protected stair with a dry riser for firefighting use.
  - 1.4. Section 6(e) of the fire statement confirms that both blocks have been designed using BS9991 for the accommodation areas and BS9999 for the ancillary/amenity areas. HSE has assessed the application on that basis.

## Consultation

- 1.5. Following a review of the information provided, HSE has identified the fire safety concern described below.
- 1.6. Additionally, HSE has identified some matters in the Supplementary Information section that the applicant should try to address, in advance of later regulatory stages.

## Means of escape

- 1.7. Following a review of the information provided, HSE has concerns in relation to fire safety matters, specifically regarding the connection between the ‘flexible commercial’ and ‘reception’ area at ground floor and the ‘flexible commercial’ and ‘cycle store’ and student amenity areas at basement level.
- 1.8. It is unclear from the information provided what the ‘flexible commercial’ will be used for. However, it is noted that the space is designed to operate independently from the student accommodation.
- 1.9. The floor plan drawings appear to demonstrate the connection between the commercial (flexible commercial) and residential domains at ground and basement levels.
- 1.10. Section 8 of the Design and Access Statement states; “*The proposal provides c. 326sqm (GEA) of flexible commercial space distributed across Ground and Basement. The space is dual aspect with views to the street and the green courtyard space, it has*

*direct access to the central shared student courtyard with dedicated outdoor amenity. Internally, it is designed to operate independently from the student accommodation building, however it is connected to the PBSA entrance space via a double door at Ground Floor. At basement level the door connecting to the student cycle store is for fire escape only.”*

- 1.11. Fire safety standards state: *“A mixed-use development is one that contains one or more dwelling(s) and at least one non-residential occupancy. Any stair serving a dwelling within a mixed-use development should not communicate with any other occupancy.”*
- 1.12. Design changes to provide adequate separation between the commercial and residential parts of the building is required and is likely to affect land use planning considerations such as the layout and appearance of the development.

## **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.*

### **Open plan apartments / cooking facilities**

- 2.1. It is noted that west block (student accommodation) is provided with individual studios which contain cooking facilities.
- 2.2. Section 6.2.1 of the London Planning fire statement states; *“West Block will be provided with individual studios. Building Regulations guidance recommends that cooking facilities in studio apartments will be located so that they do not prevent escape if they are involved in a fire. Kitchen hob locations will be assessed to ensure a fire will not obstruct evacuation, this will be supported by provision of suppression system and thermal cut off device for the hob.”*
- 2.3. Although the applicant states the kitchen hob locations will be ‘assessed’, it is unclear what the assessment will involve, and whether the implementation of power cut off devices will be sufficient to ensure safe means of escape by the resident(s).
- 2.4. Design analysis should provide appropriate hazard assessment and tenability criteria, which include smoke levels, toxicity of smoke, heat production and human behaviours. As part of the human behaviour analysis consideration should also be given to the occupancy characteristics of the resident(s), including, mobility impaired people, wheelchair users, people who are deaf or hard of hearing and blind or partially sighted people, as part of the analysis. The psychological and physiological effects of exposure to a fire environment must not adversely affect a person’s travel to a place of safety or that of ultimate safety.
- 2.5. Additionally, it is noted that east block (residential) will be provided with open plan apartments.
- 2.6. Section 6.2.3 of the London Plan fire statement states; *“East Block will be provided with open plan apartments. Following the recommendations of BS 9991, the open plan apartments will be designed as follows:*

- *Open-plan flat dimensions will not exceed 12m x 16m;*
- *The ceilings will be at least 2.25m above floor level;*
- *The escape route within apartments (total travel distance from any point to the apartment to the flat entrance door) will not exceed 20m;*
- *Apartments will be provided with an LD1 automatic fire and alarm system, following BS 5839-6;*
- *FD30S fire doors with self-closers will be provided to the apartment entrance doors.”*

- 2.7. Fire safety standards state that; *“the kitchen should be enclosed in open-plan flats having an area exceeding 8m x 4m. Cooking appliances in open-plan flats having an area smaller than 8m x 4m should not be adjacent to the entrance of the flat”*. Cooking facilities should be located at the most remote part of the flat to protect the means of escape.
- 2.8. Any design changes in this instance, comprising internal alterations only, are unlikely to affect land use planning and it will be for the applicant to demonstrate compliance at later regulatory stages.

### **Smoke ventilation systems / Extended travel distances**

- 2.9. Section 8 of the fire statement states; *“Where travel distance exceeds the recommended limit of 15m in single direction in the West Block, a push-pull smoke extract system will be provided as recommended in BS 9991 guidance. CFD modelling will be carried out at later design stage to ensure condition in corridor is suitable for escape and firefighting. For corridors with single direction travel distance within 15m, smoke ventilation will be provided by a smoke shaft or AOV at elevation.”*
- 2.10. This is noted and it will be for the applicant to demonstrate compliance at later regulatory stages. However, if the CFD modelling does not support the design, any subsequent redesign may affect land use planning considerations.

### **Hydrants**

- 2.11. Section 13 of the fire statement requires detail of adequate firefighting water via hydrants and whether they are useable/operable. The applicant states; *“Fire hydrants will be within 100m of each dry riser inlet. There is an existing hydrant at Jamestown Road within 100m of the proposed dry riser inlet location however its condition is to be confirmed.”*
- 2.12. Without confirmation that there is a suitable water supply, the building might be relying on a disused water main or faulty hydrant. Resolving this issue may affect land use planning considerations such as the landscaping around the development, should additional hydrant installations be required. This will be subject to later regulatory consideration.

### **Photovoltaic panels**

- 2.13. It is noted that the rooftop plans for both blocks shows “Potential PV Zone”.

2.14. Where the installation of photovoltaic panels (PV panels) is proposed it should be noted that fire safety standards require suitable support of cabling to avoid obstruction of escape routes and firefighting access due to the failure of fixings and consideration should be given to ensure that all power supplies, electrical wiring and control equipment is provided with appropriate levels of protection against fire. This will be subject to further consideration at a later regulatory stage.

Yours sincerely

*M. Bottomley*

Martin Bottomley

Fire Safety Information Assessor

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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