

22nd January 2025

33-35 JAMESTOWN ROAD, LONDON

HL9179/bt/41dp9

The following represents a response to Health and Safety Executive (HSE) comments on the fire statement of the captioned project. The note should be read in conjunction with HSE comments dated 28/11/2024 (HSE ref: pgo-6191). We have responded to the comments in the document. Please see our response below.

HSE comments

Jensen Hughes response

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.

Fire compartment separation is provided between the flexible space and the adjacent area at both levels.

The flexible space has independent means of escape (i.e. will not share means of escape with residential areas), residential stairs are separated from the flexible space via protected lobby and reception area.

The evacuation from basement plant rooms will need to rely on the open circulation stair in the flexible space to satisfy travel distance requirements. It should be ensured that the door into the flexible space from basement cycle store would be unlocked with fire alarm and the exit doors to outside at ground floor flexible space is openable from inside, such that this exit route is always available. Plant rooms only require occasional access by maintenance personnel who are always awake and familiar with emergency procedures, in the rare event of the route via flexible space is not available (e.g. circulation stair under refurbishment and out of use), maintenance staff will be advised regarding the situation, detection and alarm system will be provided to the plant rooms such that they can escape immediately to the stair core in an emergency.

Fire statement is updated to clarify this.

HSE comments	Jensen Hughes response
<p>Open plan apartments / cooking facilities</p> <p>2.1. It is noted that west block (student accommodation) is provided with individual studios which contain cooking facilities.</p> <p>2.2. Section 6.2.1 of the London Planning fire statement states; <i>“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.”</i></p> <p>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).</p> <p>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.</p>	<p>The new BS 9991:2024 now provides guidance on clearance distance required for open-plan kitchen. Kitchen hob will be at least 1.8m from a 0.9m wide escape route to ensure a fire will not obstruct evacuation, no fixed obstruction will be located within the 0.9m wide escape route. Alternatively the kitchen hob could also be located at remote end of the room such that the escape direction will be away from the hob.</p>
<p>2.5. Additionally, it is noted that east block (residential) will be provided with open plan apartments.</p> <p>2.6. Section 6.2.3 of the London Plan fire statement states; <i>“East Block will be provided with open plan apartments. Following the recommendations of BS 9991, the open plan apartments will be designed as follows:</i></p> <ul style="list-style-type: none"> • <i>Open-plan flat dimensions will not exceed 12m x 16m;</i> • <i>The ceilings will be at least 2.25m above floor level;</i> • <i>The escape route within apartments (total travel distance from any point to the apartment to the flat entrance door) will not exceed 20m;</i> • <i>Apartments will be provided with an LD1 automatic fire and alarm system, following BS 5839-6;</i> • <i>FD30S fire doors with self-closers will be provided to the apartment entrance doors.”</i> <p>2.7. Fire safety standards state that; <i>“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”</i>. Cooking facilities should be located at the most remote part of the flat to protect the means of escape.</p>	<p>The new BS 9991:2024 now permits open plan apartment to have dimensions up to 16m x 12m, this is achieved in the design.</p>

HSE comments

Jensen Hughes response

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.

Noted, CFD to be carried out at detail design stage.

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.

There are 3 hydrants surrounding the site, and these are not identified as being out of service. In terms of the water supply Thames Water need to carry out modelling to confirm capacity on the network for domestic purposes, this will be carried out in the next design stage.

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.

Noted, to be considered in detail design stage.