

# 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-6560
<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>	20/01/2025
<b>Date consultation received</b>	24/01/2024
<b>Date response sent</b>	30/01/2025

## 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 ('content')

### 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.

### **Previous consultation**

- 1.5. HSE issued a substantive response (concern) dated 28/11/2024, under the reference pgo-6191 in relation to a consultation received on 11/11/2024.

### **Current consultation**

- 1.6. A subsequent email was received from the LPA on 24/01/2025 requesting further consultation, the applicant had provided comments regarding HSE's concern as well as a revised fire statement. For the avoidance of doubt, this substantive response is in relation to the revised information.
- 1.7. Following a review of the comments from the applicant and the revised fire statement, HSE is content with the fire safety design as set out in the project description, to the extent it affects land use planning considerations.

## **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.*

### **Means of Escape**

- 2.1. HSE had previously raised a concern regarding a connection between the residential and the "flexible commercial" parts of the building at ground floor and basement level.

- 2.2. In response to HSE's concerns the applicant states; *"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."*
- 2.3. Additionally, section 7.2 of the revised fire statement states; *"The flexible space has independent means of escape to outside directly, it will not share means of escape with residential areas. Travel distances comply with requirements in table above."*
- 2.4. With regard to the connection at basement level between the "flexible commercial" space and the cycle store and plant rooms the applicant states; *"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."*
- 2.5. It is noted that there is a connection between commercial and residential occupancies by way of the reception area at ground floor level and between the cycle store and flexible commercial space at basement level
- 2.6. It will be for the applicant to demonstrate that appropriate means of escape are provided at the next regulatory stage. Any design changes necessary could be achieved by way of internal alterations and would be unlikely to affect land use planning considerations.

### **Inner Rooms**

- 2.7. Plan drawings illustrate that the plant rooms at basement level are accessed via a corridor, however, to get to the plant rooms corridor the occupants would have to go through the cycle store (access room). Therefore, HSE has considered the plant rooms as an inner room condition.
- 2.8. Fire safety guidance recommends that an inner room is only acceptable if the inner room is accessed directly from the access room.
- 2.9. HSE acknowledges that the plant rooms only require occasional access by maintenance personnel who are always awake and familiar with emergency procedures. It will be for the applicant to demonstrate that appropriate means of escape is provided at later regulatory stages.

Yours sincerely

*M. Bottomley*

Martin Bottomley

Fire Safety Information Assessor

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