

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	London Borough of Camden
LPA planning ref no	2025/0939/P
Our ref	25-0154
Site address	Camden Goods Yard, Chalk Farm Road, London NW1 8EH
Proposal description	Variation of Conditions 3, 4, 5, 6 (approved drawings and documents) and 73 (number and mix of residential units) of planning permission 2017/3847/P dated 15/6/18 (as amended by permission refs. 2020/0034/P, 2020/3116/P and 2022/3646/P) to secure amendments including: a reduction in the number of homes; a reduction in the percentage of affordable housing; alterations to the mix of homes provided; an increase to the building footprint of Block E1; reductions to the heights of Blocks C, E1, E2 & F; an increase in the height of Block D to accommodate a lift overrun; provision of additional staircases to Blocks C, E1 and F; and relocation of escape stairs for the supermarket.
Date on fire statement	03/03/2025
Date consultation received	06/05/2025
Date response sent	27/05/2025

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

1.1. The above application has been made under s73 of the Town and Country Planning Act 1990 for variation of conditions. The application seeks to vary Conditions 3, 4, 5, 6 (approved drawings and documents) and 73 (number and mix of residential units) of Planning Permission Reference 2017/3847/P dated 15/6/2018 relating to Camden Goods Yard, a development in London Borough of Camden. HSE was not consulted about the original application because it predated the establishment of HSE as a statutory consultee in relation to fire safety matters, for relevant buildings.

1.2. It is understood that this is the 4th application under Section 73 pursuant to the Original Permission (2017/3847/P) and makes amendments to Phase 3 only.

1.3. The current application for the Camden Goods Yard Development consists of five independent residential blocks, i.e. Block C, D, E1, E2 and F, as highlighted in yellow in the figure below, where residential amenity facilities, residential ancillary accommodations and commercial accommodations are provided.

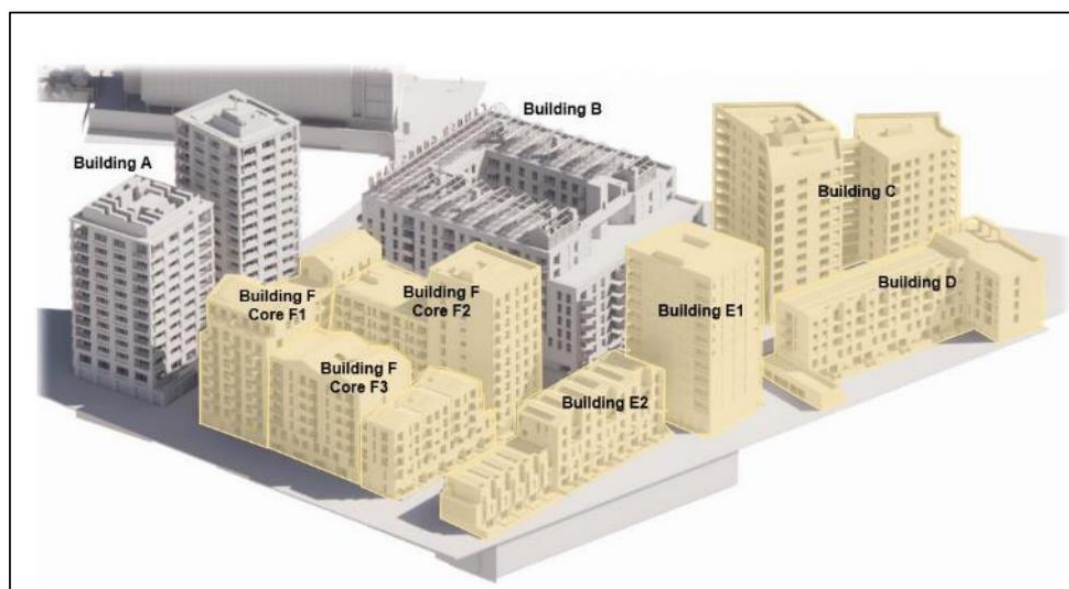


Figure 1 – Blocks of this S73 application

- 1.4. The current application proposes the following amendments:
- a reduction in the number of homes;
 - a reduction in the percentage of affordable housing;
 - alterations to the mix of homes provided;
 - an increase to the building footprint of Block E1;
 - reductions to the heights of Blocks C, E1, E2 & F;
 - an increase in the height of Block D to accommodate a lift overrun;
 - provision of additional staircases to Blocks C, E1 and F; and
 - relocation of escape stairs for the supermarket.

1.5. Section 6 of the Fire Statement confirms that the height of the development ranges from 13.025m (Block E2) to 32.675m (Block E1) (5 to 11 storeys, respectively). The development will have a residential car park and shopping area on the ground level, and offices on the ground and one upper floor. No basement level is proposed.

Building		Number of Floors	Top Storey Height
Block C		Ground + 10 upper floors	32.325m
Block D		Ground + 4 upper floors	16.75m
Block E1		Ground + 10 upper floors	32.675m
Block E2	3 Blocks of flats	3 upper floors	See Note*
	5 Townhouses	Ground + 1 upper floor	3.35m
	5 Townhouses	Ground + 2 upper floors	6.45m
Block F	Core F1	Ground + 8 upper floors	27.125m
	Core F2	Ground + 10 upper floors	32.4m
	Core F3	Ground + 6 f upper floors	20.0m

Table 1 – Building descriptions

1.6. The Blocks D and E2 are below 18m in height, and each will be provided with a single evacuation stair. Other residential buildings will be provided with two stairs. All buildings, except Block E2, will be provided with an evacuation lift for each stair.

1.7. Section 8 of the Fire Statement, confirms that “*residential buildings over 18m in height, they will be provided with a firefighting shaft that shall incorporate a firefighting lift.*” Also, “*although Block D is under 18m in height, a firefighting shaft is provided to achieve the hose laying distance. The firefighting shaft will incorporate a dry riser, firefighting lift, and a firefighting stair. Block E2 is up to 18m in height will be provided with dry riser mains to achieve hose laying distances.*”

Consultation

1.8. Section 6 e) (building schedule) of the fire statement confirms that the design standards used, are: BS9991:2024 (*‘Fire safety in the design management and use of residential buildings – Code of practice’*) for the residential areas, and BS9999:2017 (*‘Fire safety in the design, management and use of buildings – Code of practice’*) for commercial (shop and offices) areas. HSE has assessed the application accordingly.

1.9. Following a review of the information provided in the planning application, HSE is content with the fire safety design as set out in the project description, to the extent it affects land use planning considerations. However, HSE has identified matters that the applicant should try to address in advance of later regulatory stages.

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.

Smoke Ventilation and Computational Fluid Dynamic (CFD) modelling analyse

2.1. The proposed Floor Plans Drawings for Block C, show at levels L1 to L9, that the travel distance from the furthest apartment exceeds the maximum 15m for single direction travel, specified in the adopted fire safety design standard.

2.2. Section 7 of the Fire Statement, states: “*Where there are travel distances within the common corridors that are extended beyond the recommendations of BS 9991:2024 in all buildings other than Block E2, to mitigate the extended travel distances, a 0.6m² mechanical smoke shaft will be provided at the dead end to protect the staircase from smoke ingress. At a later stage of design, a **Computational Fluid Dynamics (CFD)** assessment will be required to validate the smoke venting strategy for the blocks in accordance with the guidance from the Smoke Control Association: (SCA) Guidance on Smoke Control to Common Escape Routes in Apartment Buildings (July 2020).*”

2.3. If the CFD analysis does not support the design in the planning application, this may affect land use planning considerations such as the layout and appearance of the development. It will be for the applicant to demonstrate compliance at later regulatory stages.

Green Roof/Wall(s)

2.4. It is noted on the ‘Roof Plan’ drawing, the proposed installation of a green roof. Section 7 of the Fire Statement, states: “*Where green roofs are provided, 500mm wide fire breaks would be required along the perimeter edge in accordance with GRO Fire Risk Guidance and DCLG Fire Performance of Green Roofs and Walls.*”

2.5. A green roof may constitute a fire hazard as it requires a regular management and maintenance regime, and the external envelope of a building should not provide a medium for undue fire spread. Where a green roof is proposed, sufficient fire resistance to prevent fire spread to any adjoining roofs/wall(s) will be required. It will be for the applicant to demonstrate that the proposed green roof is viable in relation to fire safety at later regulatory stages.

2.6. Guidance for green roofs can be found in [Fire performance of green roofs and walls - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/fire-performance-of-green-roofs-and-walls), published by the Department for Communities and Local Government. Where regulation 7(2) applies, that regulation prevails over all the provisions in this paragraph.

Photovoltaic Panels

2.7. It is noted on the ‘Proposed Roof Plan’ drawing that the new proposal includes provision of photovoltaic panels on the roof. Where the roof top installation of 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.

Hydrants

2.8. Section 13 of the fire statement, states: “*A proposed private hydrant will be provided within 90m of the dry fire main inlets in accordance with BS 9991. Any existing hydrants shall be reviewed to ensure they are usable and operable.*” However, without confirmation that there is a suitable water supply, the development 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.

Yours sincerely

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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

