

Advice to the Local Planning Authority

Health and Safety Executive (HSE) advice to the local planning authority (LPA).

To LPA	Camden Council
LPA planning ref no	2020/5473/P
Our ref	pgo-1309
Site address	17-37 William Road London NW1 3ER
Proposal description	Demolition (of No. 35-37) and redevelopment to provide a 15 storey (plus basement) building for use as student accommodation with affordable workspace (No. 17-33 Ground floor) and associated works.
Date consultation received	12/05/2022
Date response sent	23/05/2022

Headline response from HSE

Headline Response from HSE **'Advice to LPA' - Significant Concern**

1. Advice for the LPA

Thank you for consulting HSE about this application.

◀ Nature of Response Advice provided to the planning authority Nature of Response ▶

Scope of advice

- 1.1 This planning application was validated before the planning gateway one service at HSE was established on 1 August 2021. Therefore, HSE was not a statutory consultee for this application. This advice is provided following a request by the local planning authority, which was made on a discretionary basis. HSE is now the statutory consultee on fire safety matters for developments that contain a relevant building.
- 1.2 It is understood that the above consultation relates to a proposed relevant building of 15 storeys with a storey height of 41m, served by a single staircase. The single staircase constitutes the only escape staircase and only firefighting staircase serving dwellings on upper floors.

- 1.3 The following assessment considers fire safety matters that affect or have implications for land use planning.
- 1.4 For reference, the following documents have been provided in addition to documents made available of the planning register:
- A fire strategy document dated November 2020 reference EL7081/R1 Issue 3 ('the fire strategy').
 - A proof of evidence citing PINS reference APP/X5210/W/21/3284957 ('the proof of evidence').
- 1.5 It is noted that the documents provided make reference to fire safety standards including:
- BS 9999:2017 '*Fire safety in the design, management and use of buildings – Code of practice*' ('BS9999'); and,
 - BS 9991:2015 '*Fire safety in the design, management and use of residential buildings – Code of practice*' ('BS9991').

Means of escape and fire service access

- 1.6 Drawings on the planning register (specifically, 'PROPOSED GROUND FLOOR PLAN - PLOT A' dated 26/10/2020; and 'PROPOSED BASEMENT PLAN' dated 26/10/2020) show that the single staircase serving dwellings descends to the basement level. If a staircase forms part of the only escape route from an upper storey the staircase should not continue down to the basement (BS9991 clause 30.2). Design changes necessary to provide alternative access to the basement, and means of escape from the basement to a place of safety outside the building, will affect land use planning considerations such as the layout and appearance of the development.
- 1.7 Drawings on the planning register (specifically, 'PROPOSED BASEMENT PLAN' dated 26/10/2020) show the lifts descending to the basement. A lift should not be continued down to serve any basement storey if it is in a building, or part of a building, served by only one escape stair (BS9999 clause 15.8). Design changes necessary to provide alternative lift access to the basement, and alternative access to the lifts, will affect land use planning considerations such the layout and appearance of the development.
- 1.8 The basement drawing on the planning register shows the single staircase connected with basement areas of higher fire risk, such as a plant room and a cycle store (which may store electric cycles containing lithium batteries). Where a single staircase forms part of the only escape route from a flat it should not also serve areas of special fire hazard, or areas of a similar risk. (BS9991 clause 38). Design changes necessary to provide alternative access and escape to and from these areas will affect land use planning considerations such the layout and appearance of the development.

- 1.9 The basement drawing on the planning register shows the single staircase connected with basement areas marked with non-residential uses such as a cinema (area 27) and gym (area 26). Any staircase serving a dwelling within a mixed-use development should not communicate with any other occupancy. (BS9991 clause 31). As these non-residential areas are highly likely to be empty and unmonitored outside of waking hours, they pose a risk to the single staircase serving dwellings on upper floors.
- 1.10 Similarly, the drawing of the fourteenth floor ('PROPOSED LEVEL 14 FLOOR PLAN' dated 26/10/2020) shows an entire floor dedicated to what appears to be an assembly and recreation use. Again, this floor is highly likely to be empty and unmonitored outside of waking hours. It therefore poses a risk to the single escape staircase. Design changes necessary to provide alternative access to, and escape from, the non-residential uses will affect land use planning considerations such as the layout and appearance of the development, and possibly the number of dwellings provided.
- 1.11 The drawings of levels 04 and 05, and 06 and 07 ('PROPOSED LEVEL 04-05 FLOOR PLAN' dated 26/10/2020, and 'PROPOSED LEVEL 06-07 FLOOR PLAN' dated 26/10/2020) show flat windows in close proximity, and at right angles, to the escape route windows. This proximity and angle may allow the spread of fire from a flat to the escape route (BS9991 Figure 31). Design changes necessary to resolve this issue may affect land use planning considerations such as the external appearance of the development in these areas.
- 1.12 It is noted that the proposed fourteenth floor is dedicated to an assembly and recreation use. It is highly likely that, if occupants of this floor become aware of a fire incident on a lower floor (for instance by seeing fire engines on the street below), they will descend down the single staircase. This is likely to result in conflicting flows of occupants and firefighters (who will be running firefighting operations from within the staircase). It will be for the applicant to demonstrate a means of escape is available for use at all material times including during firefighting operations. Any design changes necessary will affect land use planning considerations such as the layout and appearance of the development.
- 1.13 Paragraph 3.11 of the proof of evidence states in relation to the arrangements for smoke control: *'...The approach developed to protect the stair is considered appropriate in relation to the building height and occupancy risk profile. It includes a dedicated stair and lift lobby, which then provides additional access to the common corridors. This arrangement is shown in Figure 6a of BS9991:2015...'*
- 1.14 It is understood from this statement that smoke control provisions are proposed in accordance with Figure 6a of BS9991. However, the siting of automatic opening vents (AOVs) in Figures 3 and 4 of the fire strategy does not appear to be consistent with the guidance in Figure 6a of BS9991 regarding the siting of automatic opening vents.
- 1.15 The siting of AOVs will need to be assessed to ensure that escape routes remain tenable during a fire. This may require assessment to ensure that an adverse prevailing wind cannot negatively affect the efficacy of the smoke ventilation and/or create 'flow paths' of wind through the building which could affect fire conditions and

present hazards. Any design changes following such analysis may affect land use planning considerations such as the appearance of the building.

- 1.16 It is considered that the above matters individually, and in combination, pose a risk to the health, safety and wellbeing of future occupants. Design changes necessary to resolve these issues will affect land use planning considerations such as lay out and appearance of the development.

Yours sincerely,

23/05/2022

A handwritten signature in black ink, appearing to read 'Jon Bryan', is positioned above a solid black horizontal line.

Signed by: jon.bryan

This substantive response provides fire safety advice to the local planning authority. It's based on the information provided as it relates to land use planning.

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**