

Substantive response

Substantive response 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	Camden Council
LPA planning ref no	2022/1603/P
Our ref	pgo-1446
Site address	The Greenwood Centre, Greenwood Place & Highgate Day Centre, 19-37 Highgate Road London NW5 1LB
Proposal description	Variation of Conditions 2 (development in accordance with approved plans) and 15 (social enterprise unit opening hours) granted under reference 2013/5947/P, dated 18/06/2014 (as amended by reference 2015/3151/P, 2016/0936/P, 2017/0363/P, 2017/01518/P, 2021/5384/P and 2022/0929/P) (for: Demolition of existing buildings and redevelopment to provide: a new Centre for Independent Living at Greenwood Place; and mixed-use development at Highgate Road comprising residential units, including supported affordable housing units, and social enterprise space; highway improvements; plant, landscaping; servicing; disabled car parking etc.). Amendments to Highgate Road site to include excavation of basement, installation of substation at ground floor, reconfiguration of internal layout, provision of 5x supported living units at ground floor level, 5x net additional residential units, elevational changes, material changes and associated plant, landscaping, servicing, cycle and refuse storage alterations.
Date on fire statement	07/04/2022
Date consultation received	15/06/2022
Date response sent	06/07/2022

Headline response from HSE
<div> <div>Headline Response from HSE</div> <div>'Advice to LPA' - Some Concern</div> </div>

1. Substantive response 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 consultation

- 1.1 It is noted that the above consultation relates to a relevant building comprising two blocks with storey heights of 16.75m and 23.85m respectively. Each block is served by a single staircase which constitutes the only escape staircase and only firefighting staircase.

Previous consultation

- 1.2 HSE provided a substantive response (some concern) dated 09/06/2022 in relation to a consultation received on 11/05/2022.
- 1.3 A subsequent consultation was received on 15/06/2022 providing a letter dated 22 June 22 citing reference 2612/Letters/AT/sb ('the applicant's response'). For the avoidance of doubt, this substantive response is in relation to the applicant's response.

HSE's outstanding concerns

- 1.4 For ease of reference, following a review of the information provided by the applicant, HSE maintains the following concern:
- Means of escape, including single staircases being made vulnerable due to the connection with ancillary accommodation of high fire risk.
- 1.5 The above concern has not been resolved to HSE's satisfaction. The resolution of this concern is likely to affect land use planning considerations such as the design, layout, appearance and landscaping of the development. If the applicant is unable or unwilling to resolve these concerns, then an impasse has been reached.

The applicant's response

- 1.6 In relation to the connection of a bin store with the single staircase in core B, the applicant's response states:

'The core B staircase has a separate escape route to outside to the Southwest of the building independent of the lobbies connected to the bin store. Additionally, the stair will be separated from the stair by two smoke vented protected lobbies, as follows:

- *lobby separating the stair from the reception provided with smoke venting equivalent to that provided within the common corridors on the levels above*

- access lobby leading to the bins store area provide with 0.4m² permanent natural smoke ventilation
The combination of the above factors is considered to provide sufficient protection to the staircase from ingress of smoke in the event of a fire within the bin store area. Therefore, current arrangement is considered reasonable.'

1.7 The applicant's comments are noted. However, the connection of staircases and ancillary accommodation with lobbies is only appropriate in multi-staircase, not single staircase, buildings. Design changes necessary to provide alternative, separated, external access to the bin store will affect land use planning considerations such as the appearance of the development.

2. Supplementary information for the applicant

The following points do not contribute to HSE's overall headline response and are intended only as advice for the applicant. These comments identify items that could usefully be considered now to reduce the risk of making changes to the design at a later stage, which could have planning implications.

2.1 In relation to the fire performance classification of external wall systems, the applicant's response states: *'The materials used in construction of balconies, other specified attachments and external wall systems are to achieve at least A2-s1,d0 performance, in line with requirements of Regulation 7(2)'*. This is noted and will be assessed during later regulatory stages.

2.2 In relation to access routes to the core B firefighting shaft passing through the reception, the applicant's response states: *'It is proposed for the firefighting access to Block B to be provided from Highgate Road via the Reception area. This approach will ensure consistency of approach to both Blocks A and B and reduce potential for confusion when accessing the site, hence reducing the time required to begin firefighting operations. This is considered reasonable as the firefighting shaft will be separated from the Reception by a smoke vented protected lobby and alternative escape route to outside is provided from the stair to the Southwest to the building'*.

2.3 A corridor giving access to a firefighting shaft should not be used as a circulation space. In this instance, however, the resolution of this matter may not significantly affect land use planning considerations. Suitable access routes to firefighting shafts will, however, be required, and subject to later regulatory consideration.

Yours sincerely,

06/07/2022

A handwritten signature in black ink, appearing to be 'Jon Bryan', is positioned above a 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**