

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	LB of Camden
LPA planning ref no	2022/2359/P
Our ref	pgo-1614
Site address	Block B Agar Grove Estate Agar Grove London NW1 9SS
Proposal description	Variation of condition 63 (approved plans), 61 (housing mix), of planning permission ref: 2013/8088/P dated 04/08/2014 (as amended by 2020/0468/P dated 16/02/2020) 2019/4280/P (as amended) (for demolition of existing buildings and structures except Lulworth House and Agar Children's Centre (249 existing Class C3 residential units and 2 retail units), and erection of new buildings ranging between 4 and 18 storeys in height along with the refurbishment and extension of Lulworth House to provide Class C3 residential units; a community facility (Class D1); 2 flexible retail shop (Class A1) or restaurant and cafe (Class A3) units; business space (Class B1(a)); 2 flexible retail shop (Class A1), business (Class B1) or non-residential institution (Class D1) units), namely to allow adjustments to Block B, including addition of second stair cores and evacuation lifts; revised unit mix; reduction in 11 units; additional cycle storage; and changes to external appearance.
Date on fire statement	26/05/2022
Date consultation received	15/07/2022
Date response sent	27/07/2022

Headline response from HSE

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

1. Substantive response for the local planning authority

Thank you for consulting HSE about this application.

Scope of consultation

- 1.1 It is noted that the above application seeks a “variation of condition 63 (approved plans), 61 (housing mix), of planning permission ref: 2013/8088/P dated 04/08/2014 (as amended by 2020/0468/P dated 16/02/2020) 2019/4280/P (as amended), namely to allow adjustments to Block B, including addition of second stair cores and evacuation lifts; revised unit mix; reduction in 11 units; additional cycle storage; and changes to external appearance”.
- 1.2 The previous planning applications were submitted prior to the HSE becoming the statutory consultee for relevant buildings in relation to fire safety matters, and therefore we were not required to be consulted on the original applications.
- 1.3 The comments below and the substantive response headline are based on the information in the application including the floor plans and supporting documentation available on the planning register.
- 1.4 It is noted that the above application relates to a relevant building consisting of two blocks. Block B1 has 7 storeys and an uppermost floor height of 20.5m. Block B2 has 18 storeys and an uppermost floor height of 55.7m.
- 1.5 It is noted that residential accommodation is proposed on 2nd to 17th storeys, and that ground and 1st floors consist of ancillary accommodation, community and flexible workspace.
- 1.6 We welcome the amended plans providing an additional staircase within Block B2. The floors plans identify that that both blocks have multiple staircases, serving all floors.

Means of escape

- 1.4 Block B1 ground and first floor plan identifies a ‘community and flexible workspace’ areas connecting with the residential means of escape and firefighting lobby (protected corridor). These are considered places of assembly, entertainment or recreation, which is not ancillary to the residential accommodation.
- 1.5 It is noted that final exits are available from the ‘community hall’, but suitable separation should be provided between the residential and non-residential means of escape. Fire safety standards state that a separate means of escape should be provided from any storeys or parts of storeys used for the ‘residential’ or ‘assembly and recreation’ purpose groups. Additionally, different purpose groups should be separated from one another by compartmentation. Design changes necessary to provide separation between occupancies and their means of escape will affect land use planning considerations where reconfiguration of floor plans, design and layout are proposed.
- 1.6 Likewise, Block B2 first floor plan shows the secondary residential staircase opening into the commercial/workspace area. It is noted that the firefighting lift serves this floor. Fire safety standards state that all stairs and firefighting stairs serving dwellings should not communicate with any other occupancy in that building.

- 1.7 Any alterations to the provision of the secondary staircase should take into consideration increased occupant travel distances as a result of the staircase not being accessible on that floor. It is likely that design changes necessary to provide suitable means of escape separation will affect land use planning considerations relating to the design and layout of the building.

Fire service access and facilities.

- 1.8 Block B2 ground floor plans demonstrate that the corridor, forming part of the firefighting shaft, is connected with ancillary accommodation consisting of community area, refuse store, cleaner's store and service risers, as well as the secondary staircase that serves all storeys, including the roof plant area. Only services associated with the firefighting shaft should pass through or be contained within the fire-fighting shaft. A fire-fighting shaft should not contain any cupboards or provide access to service shafts serving the remainder of the building.

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.

Means of escape

- 2.1 Block B1 ground floor plan identifies both staircases opening into the same lobby. An arrangement in which two stairs terminate in the same enclosure at final exit level should not be employed, because an outbreak of fire leading to penetration of the enclosure at that level would render both stairs simultaneously unusable. Design changes necessary to provide suitable separation at ground floor level may affect land use planning consideration where reconfiguration of the staircases is proposed.
- 2.2 It is noted that PV panel installations are proposed on the roof areas of both blocks. All power supplies, electrical wiring and control equipment should be provided with appropriate levels of protection against fire. Fire safety standards require suitable support of cabling to avoid obstruction of escape routes and firefighting access due to the failure of fixings.
- 2.3 Block B2 ground floor plan identifies a bike store. It may be advisable to consider the risk to fire safety by the presence of the electric cycles/scooters within the building because they may contain lithium-ion batteries. Lithium-ion batteries may suffer thermal runaway and cell rupture, releasing large volume of toxic gases, heat and smoke before catching fire as well as afterwards. If handled or stored incorrectly, they can pose a significant safety risk. When they burn, a large amount of water is needed to fight a fire involving lithium-ion batteries. Furthermore, there is a danger of explosion and electrical shock for firefighters when tackling a fire. Any consequent design changes may affect land use planning considerations such as design, layout and appearance of the development.

Fire service access and facilities.

- 2.4 Block B2 first floor plan identifies that the firefighting staircase does not open to enable access to the firefighting lift. Fire safety standards state that if a firefighting shaft contains a firefighting lift, the firefighting stair in that shaft should serve every storey served by the firefighting lift. Design changes necessary to provide suitable

compartmentation are likely to be internal alterations, which are unlikely to affect land use planning considerations in this instance.

- 2.5 Block B2 floor plans demonstrate that the firefighting lift is situated approximately 8m from the firefighting staircase, which is marginally in excess of the standard. Fire safety standards state that both the firefighting lift and staircase are used together during fire-fighting operations. The staircase is the line of retreat if the fire-fighting lift fails, the firefighting lift landing doors should not be placed more than 7.5m from the firefighting staircase in support of firefighter safety. Design changes necessary to provide the recommended firefighter travel distance may affect land use planning considerations relating to design, layout and appearance of the building where internal layout alterations are proposed.

Qualitative Design Review

- 2.6 Section 7 of the 'pgo fire statement' confirms the proposal of "smoke control to protect the residential lobbies and corridors". It was not possible to determine from the information provided, whether a qualitative design review has been completed for this development.
- 2.7 Fire safety standards state that where a fire engineered solution is proposed a Qualitative Design Review (QDR) should be completed. This should be identified on a fire statement form with clear justification explaining why the proposal is the only viable solution. A helpful approach would be to append a benchmarking schedule to the fire statement. This would summarise the results of a QDR and identify alternatives proposed against fire standards. The proposed alternatives should demonstrate that an equivalent level of safety to fire standards has been achieved.
- 2.8 A QDR would provide explanatory information to support the planning application and would contain an assessment of "what if" events made to identify system failures or foreseeable events that might have a significant influence on the outcome of the study. The outcome of a QDR may require subsequent changes which may affect land use planning considerations such as design, layout and appearance of the building.
- 2.9 It will be for the applicant to demonstrate that the means of escape is capable of being safely and effectively used at all material times, including during firefighting operations, and the LPA should satisfy itself that a design review has been undertaken. From the application documentation it is not immediately obvious that a review has been undertaken, such that it has informed the design of the scheme.
- 2.10 Any assessment relating to fire safety protection measures should be conducted at the earliest possible opportunity, as any resultant design changes may require HSE consultation relating to land use planning considerations.

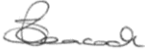
Fire Statement Form

- 2.10 Fire statements must be submitted on a form published by the Secretary of State (or a form to similar effect) and contain the particulars specified or referred to in the form. It is noted that the fire statement details have not been completed on the appropriate form and it appears that some information has not been included. For example, Section 8 should provide an explanation relating to any issues which might affect the fire safety of the development and how these have been addressed. This may include information relating to a deviation from the fire safety standards, i.e., extended corridor travel distances, where a fire engineered solution is proposed, and how this proposal

provides an equivalent level of fire safety than that of code compliance. To assist our consultation process it is recommended that future submissions be provided using the Secretary of State pro-forma to ensure all relevant information is provided.

Yours sincerely

27/07/2022



Fire Safety Information Assessor

Signed by: sara.peacock

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.

It takes into account any fire safety information from section 9 of the fire statement form (where 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**