

# 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.

<b>To LPA</b>	LB of Camden
<b>LPA planning ref no</b>	2022/2359/P
<b>Our ref</b>	pgo-1686
<b>Site address</b>	Block B Agar Grove Estate Agar Grove London NW1 9SS
<b>Proposal description</b>	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.
<b>Date on fire statement</b>	N/A
<b>Date consultation received</b>	28/07/2022
<b>Date response sent</b>	03/08/2022

## Headline response from HSE

Headline Response from HSE ('content')

## 1. Substantive response for the local planning authority

Thank you for consulting HSE about this application.

◀ Nature of Response HSE is satisfied with the information provided with the application. Nature of Response ▶

### Scope of consultation

- 1.1 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.

### Previous consultation

- 1.2 HSE issued a substantive response (some concern) dated 27/07/2022, our reference pgo-1614, in relation to a consultation received on 15/07/2022.
- 1.3 This substantive response relates to the applicant's response, a document titled '1971\_FSR001.0\_Block B, Agar Grove\_Fire Statement HSE Responses\_220728', available on the planning register. For the avoidance of doubt, this substantive response is in relation to the applicant's response.

## 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 In relation to the separation of the residential staircase from the commercial occupancy at first floor level, the applicant's response states:

*"The first floor of Block B2 has been updated following the planning application to remove access to the fire-fighting stair at this level. The fire-fighting lift is not intended to serve this floor and will not be accessible by users of the flexible workspace. A secured door is, however, provided to the lifts in order to provide access for maintenance to lifts and risers. Access for fire-fighting on the first floor is provided via a separate stair serving the flexible workspace."*

For clarification, our comment refers to the residential staircase (the southern staircase, as per the floor plans provided), not the firefighting staircase (northern staircase). It is unclear from the recent information, if the 'residential' staircase has been separated from the non-residential area at first floor level. However, the resolution of this concern can be achieved without affecting land use planning considerations.

Thank you for providing clarification regarding the travel distance within this area. Any further issues will likely be raised at later regulatory stages.

- 2.2 Thank you for providing clarification relating to the use of the 'community' areas addressed within HSE reference 1.4 of the previous consultation. It is advised that where these areas are proposed for commercial use in the future (i.e., private room hire), it will require suitable compartmentation separation from the residential use of the building. Whilst this may not be a land use planning consideration, it will likely be raised at later regulatory stages.

- 2.3 Thank you for providing clarification relating to the Block B1 staircases having external final exits, so as to ensure the staircases do not terminate within the same lobby. This is duly noted.

### **Fire service access and facilities**

- 2.4 In relation to the provision of a firefighting shaft (inc. staircase and lift), the applicant's response states:

*“Access to the fire-fighting stair within Block B2 is via a corridor which leads directly to open air and is not connected to any accommodation. Comment 1.8 appears to refer to the corridor between the fire-fighting stair and the lift lobby, which do not form part of the fire-fighting shaft. Clauses 50.3.1 and 50.3.2.1 of BS9991 states that cupboards and service shafts should not be contained within fire-fighting stairs, rather than fire-fighting shafts. This clause is observed in the proposed design. Clause 50.3.2.2 of BS9991 states that the firefighting lift may open directly into a protected corridor or lobby, as in the proposed design. Access to residential fire-fighting stairs and lifts may be accessed via a common corridor containing accommodation as per Figure 35 of BS 9991. We note that the cleaner's cupboard would be typically be accessed by way of a lobby, however, due to the size and low-risk nature of this sprinklered space, we have proposed a fire engineered alternative, increasing the fire resistance of the cleaners store to 120 minutes and to provide a FD120S door to this store.”*

- 2.5 Fire safety standards state that firefighting shafts should be constructed in accordance with the recommendations given in BS9999.
- 2.6 Fire safety standard (BS9999) Table 17 states that; *“any building or parts of buildings, where the height of the topmost storey (excluding any storey consisting entirely of plant rooms) exceeds 18m”, should be provided with a “firefighting shaft comprising: firefighting staircase, firefighting lobbies provided with fire main and firefighters lift installation.”*
- 2.7 The proposed plans do not clearly demonstrate that the firefighting lift forms part of the firefighting shaft. Any subsequent changes to the design may affect land use planning considerations. The provision of 120min fire-resistance to the cleaner's cupboard is noted, though it is unclear if the firefighting lift is also afforded this level of fire-resistance, however, this is not a land use planning consideration, but will likely be identified at later regulatory stages.
- 2.8 The applicant's comment that compartmentation, sprinklers and mechanical smoke extraction will be provided are noted. However, such precautions are basic requirements and are not considered to provide any enhanced level of fire safety.

### **Qualitative Design Review**

- 2.9 It is noted that a Qualitative Design Review has been initiated. It would assist the HSE consultation process in future, where a fire engineered solution is proposed, for the information be identified on the fire statement form with clear justification of why this 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 safety standards. The proposed alternatives should demonstrate that an equivalent level of safety to fire standards has been achieved.

Yours sincerely

03/08/2022



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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**