



HIGHGATE
SOCIETY

10A South Grove, Highgate, London N6 6BS

Matthew Gunning Esq.,
Haringey Planning Services By email.

3rd March 2024

Dear Mr. Gunning,

Re: HGY/2023/2493 –Townsend Yard “Redesign of plot 1 to incorporate fire brigade access to adjacent properties through an alleyway at ground floor level into the rear of the plot.”

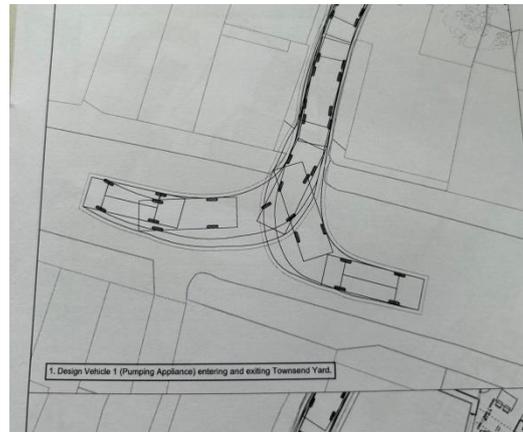
Following the Highgate Society’s earlier objection, it is now writing to object to the revised Fire Strategy Report Rev 2 (FSR2) submitted in January 2024 (but dated July 2023) in support of application HGY/2023/2493. While FSR2 primarily deals with fire safety and general fire strategy for the mews, it also addresses the fire safety strategy for the Shepherd’s Cottage (36a Highgate High Street) but does so only briefly under clause 10.7 of the report. This leaves the Society very concerned for the safety of the Cottage and its occupants. The areas of concern are:

1. Figure 7 of FSR2 is included to show conformity with Spread of Flame requirements to adjoining premises under AD:B of the Building Regulations. However, the drawing is seriously misleading because it entirely omits Shepherd’s Cottage, showing the cottage and its garden as an undivided single area without any building outline shown. Figure 10 shows Shepherds Cottage and separately its garden. It is only by examining Fig.10 that the proximity of House 1 and the rear window in House 1 to the rear of Shepherd’s Cottage becomes apparent. This should be looked at further as it appears that there could be a breach of Spread of Flame requirements.
2. Section 3.8 states that “*The responsible person has a duty of conducting a fire risk assessment which should focus on the safety in case of fire for all relevant persons.*” “Relevant persons” are explained in in 3.7 as including “those in the immediate vicinity”. The occupants of Shepherd’s Cottage are in the immediate vicinity and are clearly relevant persons. Shepherds Cottage is open plan and although we have no figures to confirm, the upper floors could well be 7.5m above rear garden level and are certainly more than 4.5m. The authors of FSR2, as “responsible persons” must consider in more detail how Shepherd’s Cottage and its occupants will be protected bearing in mind the nature of its construction and lack of fire compartmentalisation.
3. It is essential that there is unhindered access to the rear of the property and we note that, under Clause 10.7 of FSR2 it is proposed that an alleyway be formed through House 1 to give the LFB access to the rear of the Cottage. However, there are serious flaws in the design of this route as follows: Please note that most of the drawings submitted with this report fail to show the alleyway and there are no levels, or details of heights of walls within the submitted material.
 - The report proposes that the fire route passageway would be accessed, with a gate to be kept locked shut. The LFB would have, as is normal practice, FB1 keys which would allow access through this door. However, this does not help with escape by the occupants of the Cottage unless they too are to be given FB1 keys. Is this to be the case?
 - Once through the doors and at the end of the alleyway, the LFB would be required to climb over two walls, one of which is 1.8m high and forms the boundary of House 1, and the second is the cottage’s listed wall.

- The sites are at differing levels so that there is an additional 1.6m drop into the rear garden of the Cottage.
 - This alleyway does not appear to offer any viable alternative means of escape from the Cottage.
4. The FSR2 does not propose a single solution but suggests three possible options for the fire service to reach the Cottage, none of which is considered viable. Before any approval can be given, a single acceptable strategy must be presented, which the developer must be required to implement. Optional alternatives are in our view, not a satisfactory basis for any approval.
- a. Option 1 - The fire engine will drive down the lane and turn on private land
 The swept path assessment provided in the report does not show that vehicles are normally parked in the narrow High Street opposite the lane which means the fire engine does not have enough turning space in Highgate High Street to enter Townsend Yard either backwards or forwards.
 Furthermore while the fire service has the right to pass over private land, the land owner (Omved) has the right to put up a permanent barrier which would block a fire engine from turning. A turning head that requires access to private land, over which the applicant has no control and which could be redeveloped in the future, is not a suitable solution to meet ADB5. Unless the applicant is able to put in place an agreement with Omved under the terms of which Omved rescinds the right to put up a permanent barrier this cannot be considered a viable option. If the developer intends to pursue this option the agreement must be put in place before approval for further construction takes place.
 The illustrations below show cars parked opposite the entrance in an approved parking area and for comparison the swept path analysis where no parking is shown.



Cars parked opposite the lane



Swept path assessment - fire pump (pg 29)

- b. Option 2 - The fire engine will reverse into the lane and park 20m from the High Street junction.
 As stated above the fire engine cannot reverse into the lane if vehicles are parked on the High Street opposite the lane. This was confirmed by Simon Dredge to our previous chair David Richmond, where he stated that a fire engine could not reverse a short way into the yard because the yard is too narrow between no 42 and no. 44 Highgate High Street (both of which have their main entrances on either side of the lane) and which restricts the necessary access to each side of the fire engine.
 Figure 9 on page 21 of the FSR2, which has been included to demonstrate that a fire engine can reverse up the lane, is merely a crude representation of the lane and a fire engine. It is very concerning that the FSR2 submits an option that has not been accurately measured. The photo below clearly shows how constrained the lane is. The Fire Safety report in point 10.3 accepts that reversing may not be possible "In case it is established that the tender is not able to reverse, sprinklers in the 4 most

remote dwellings are required in order to extend the hose distance." So the report recommends that the 4 most remote mews houses will need sprinklers installed in case the fire engine cannot reverse but no provision is made for the Cottage in these circumstances.

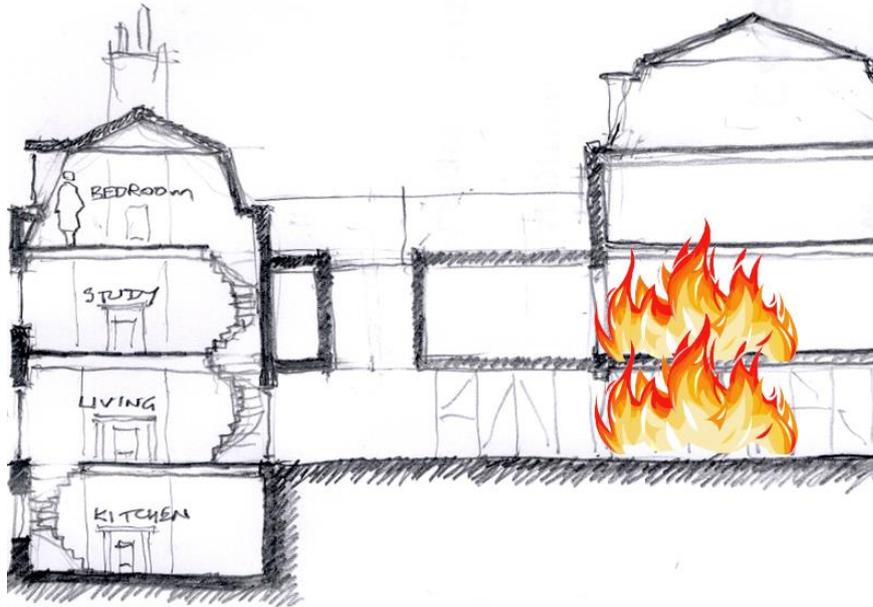


Should neither option 1 or 2 be viable the fire engine would need to park on Highgate High Street which would exceed the required 45m hose length to reach the furthest point in the Cottage.

- c. Option 3 – access to the Cottage should be “assumed” from the front of the property. Access from the High Street is through a long and narrow timber framed (and therefore highly inflammable) undercroft which has already been rejected by the LFB as being non-compliant as it is too narrow and long to meet LFB requirements. It is therefore surprising to see this being raised here again. However, in a scenario where the fire starts in a building on the High Street and spreads to the Cottage, or starts in the Cottage itself, (see diagrams of the two scenarios below), the undercroft has no fire containment. Even if firefighters were able to get to the Cottage there are no windows on that side so firefighters would have to enter a burning building. This option of relying on the assumption of access via the High Street passageway is therefore a “non-starter”.

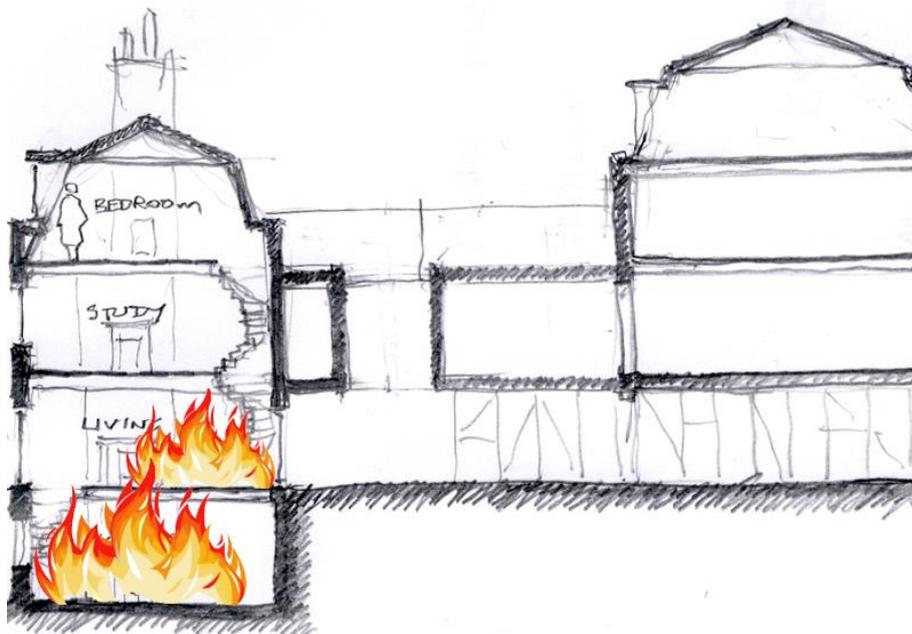
Scenario 1 – A fire breaks out in the High Street buildings cutting off the passageway to the High Street.

With the wind tunnel effect through the passageway the fire could quickly spread back towards the cottage.



Scenario 2 – A fire breaks out on the lower floors of the cottage.

Bear in mind that the cottage is timber framed with no fire separation between floors, open stairs and just floorboards on exposed timber joists. There are open fireplaces on each floor. If a fire were to break out on the lower floors it would quickly engulf the whole house so escape from the bedroom which is on the top floor would have to be through a window and the windows are only on the north side of the cottage facing Townsend Yard.



5. Furthermore Figure 11 on pg 23 of the FSR2 is not correct. It locates the “cottage rear garden” where the Cottage is so the arrow in the diagram which is supposed to show the route for firefighters directs them straight into the Cottage wall!

In conclusion the FSR2 should have a single “water tight” proposal for fire access to the Cottage that can be assessed and either approved or rejected rather than the three suggestions each with serious flaws.

As the Local Planning Authority, the Highgate Society believes the council must be made aware of, and take into account, the serious failings of the FSR2 to address fire safety issues for the Cottage so they can be taken up directly with LFB. Additionally, we are asking for your help in urging LFB to attend a meeting on site with the planners, Building Control, the Highgate Society and Catherine West MP to try to resolve these issues. Edward Caroll, the LFB Fire Officer has refused an invitation to visit by the owner of the Cottage stating in an emailed dated 29 November that he has “*no intention(s) on visiting the site*”.

The Society hopes Haringey agree that the submitted report and application HGY/2023/2493 – Townsend Yard “Redesign of plot 1 to incorporate fire brigade access” are still so flawed that this application will be refused pending a solution which truly protects the Cottage and its occupants.

Yours sincerely

Liz Morris

Co-chair Highgate Society Planning Committee

CC:

Edward Caroll (LFB)

Cllr Sarah Williams

Rob Kryszowski

Robbie McNaugher

Steve Moore (Salus)

Catherine West MP