

Advice to the local planning authority

Advice 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	Gravesend
LPA planning ref no	20230366
Our ref	pgo-3700
Site address	Clifton Slipways, West Street, Gravesend, Kent, DA11 0BW
Proposal description	Application for variation of condition 2 and 7 attached to planning permission reference no. 20191122 for the erection of two buildings to provide residential units (Use Class C3) with associated vehicle parking, cycle storage, highway works, and landscaping. Building 1 comprises the erection of 23 storey tower on the north side of West Street to provide residential dwellings with B1a floor space at ground floor level; and Building 2 from four storeys to 12 storeys on the south side of West Street which will provide residential dwellings. The proposal includes the restoration and adaptation of the existing pier structure to provide public and private amenity space to include the erection of Business units (Class B1a) and a cafe (Class A1/A3); to revise the approved plans to reconfigure the layout of the West Street Block to provide for an additional staircase and increase the number of secure cycle spaces by 13; and to remove the basement at lower ground, relocation of bin store and plant, reduction of 23 car parking spaces and replacement of car parking at level 0 with 9 additional units (loss of 55 car parking spaces) within the Stuart Road Block.
Date on fire statement	N/A
Date consultation received	01/08/2023
Date response sent	25/08/2023

1. Substantive response for the local planning authority

Thank you for consulting HSE about this application.

Headline response from HSE

Headline Response from HSE **['Advice to LPA' - Concern]**

Scope of consultation

1.1. The above application has been made under s73 of the Town and Country Planning Act 1990 for variation of conditions 2 and 7 attached to planning permission reference no. 20191122 for the erection of two buildings to provide residential units (Use Class C3) with associated vehicle parking, cycle storage, highway works, and landscaping.

Previous consultation

1.2. HSE received a consultation request on 20/06/2023 for the aforementioned planning application and responded on 18/07/2023, under the HSE reference pgo-3450, with the headline: 'Concern'.

Current consultation

1.3. A subsequent email was received from the LPA on 01/08/2023 requesting further consultation, providing amended plans and explanations with what was changed.

1.4. Following a review of the information/plans provided by the applicant, HSE raises the following concern:

Means of escape

1.5. It is noted in the email from the applicant (dated: 01/08/21023), which states: "We have lobbied the ground floor escape to include a separated final escape directly from the staircase core *to eliminate both stairs terminating in the same enclosure*". However, the plans provided do not reflect this design and therefore HSE's concern in relation to this matter remains outstanding. HSE advises the LPA to invite the applicant to commit their proposals in updated plans.

1.6. BS 9991:2015 states: "*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 to resolve this issue are likely to affect land use planning considerations such as the layout and appearance of the development.

2. Supplementary information

The following information does not contribute to HSE's substantive response and should not be used for the purposes of decision making by the local planning authority.

Means of escape

2.1. It is noted that the ground floor plan has been amended to include a lobby between the common corridor and the bin store, to avoid the escape route to the final exit being compromised. In relation to land use planning, HSE no longer maintains this concern. However, it is for the applicant to ensure regulatory compliance at later stages.

Yours sincerely


Fire Safety Information Assessor

Guidance on Planning Gateway One is available on the Planning Portal: [Planning and fire safety - Planning Portal](#).

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

