

Advice to the local planning authority

Advice to the local planning authority (LPA) from the Building Safety Regulator (BSR) as a statutory consultee for developments that include a relevant building.

To LPA	Gravesham
LPA planning ref no	20260683
Our ref	26-0774
Site address	Clifton Slipways West Street, Gravesham, Kent
Proposal description	Application for variation of condition 2 (Approved Plans) and condition 7 (Highway Works) attached to planning permission reference number 20191122 for The erection of two buildings to provide a total of 227no. dwellings with associated vehicle parking, cycle storage, highway works, and landscaping. Building 1 comprises the erection of a 23 storey tower on the north side of West Street to provide 121no. dwellings with 1no business Unit (B1a) comprising 90 sqm of 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 106no. 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 16no. Business(B1a) units comprising a total of 510 sqm of floor space; and a cafe (A1/A3) comprising up to 60 sqm of floor space.; to allow the reduction in height by 7 storey's, the reduction and relocation of parking and the increase in cycle parking.
Date on fire statement	N/A
Date consultation received	13/07/2026
Date response sent	03/08/2026

1. Substantive response for the local planning authority

Thank you for consulting the BSR about this application.

Headline response from the BSR
Headline Response ('Content')

Scope of consultation

- 1.1. The above application has been made under s73 of the Town and Country Planning Act 1990 to vary condition 2 (approved plans) and condition 7 (highway works) of full planning permission ref. 20191122.
- 1.2. The BSR (formerly HSE) was not consulted about the original application ref. 20191122, which was granted on 04/12/2020, because it was validated on 22/10/2019, prior to the establishment of Planning Gateway One as a statutory consultee for relevant buildings, in relation to fire safety matters.
- 1.3. The proposal for the original planning application ref. 20191122, was: *“The erection of two buildings to provide a total of 227no. dwellings with associated vehicle parking, cycle storage, highway works, and landscaping. Building 1 comprises the erection of a 23 storey tower on the north side of West Street to provide 121no. dwellings with 1no business Unit (B1a) comprising 90 sqm of 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 106no. 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 16no. Business(B1a) units comprising a total of 510 sqm of floor space; and a cafe (A1/A3) comprising up to 60 sqm of floor space.”*
- 1.4. The approved development (Clifton Slipways) comprises two residential buildings (Stuart Road Block and West Street Block), together with associated car parking, cycle storage, highway works, landscaping, public realm works and the restoration of the existing pier structure. The current planning application seeks a further variation to the Stuart Road Block only. The West Street Tower and pier works are not materially altered by this application.
- 1.5. The proposed amendments can be summarised as:
 - the omission of Levels 6–12 of residential accommodation, reducing the overall height of the building by seven storeys (the reduction of the Stuart Road Block to six storeys in total);
 - the omission of the Level -1 parking level and associated basement arrangement ;
 - the relocation of parking to Level 0, with an enlarged external parking court;
 - the reduction of residential units within the Stuart Road Block from 115 units under the previous Section 73 approval to 78 units (32 one-bedroom and 46 two-bedroom);
 - the reduction in the overall number of flats across the scheme from 236 units under the previous Section 73 approval to 199 units;
 - the reduction in vehicular parking from 56 spaces to 35 spaces (0.18 spaces per dwelling);
 - the increase in cycle parking from 256 spaces to 276 spaces (240 spaces in the West Street Block, retained as approved, and 36 spaces in the Stuart Road Block, an uplift of 20 spaces);
 - the retention of the approved layout to Levels 1–5, save for consequential changes associated with the revised building form and servicing strategy.
- 1.6. It is understood that Stuart Road Block is proposed to have 6 storeys (GF, plus L1 to L5). The proposed elevations drawings indicate the height of top storey of 18m, measured from upper floor surface of top floor to ground level on lowest side of

building. Also, the height of top storey (level L5) measured to the fire and rescue service vehicle access level is below 18m.

- 1.7. Stuart Road Block is proposed to be served by two stairs on all storeys, and two associated lifts.

Current consultation

- 1.8. The BSR notes the proposed changes. Following a review of the information provided in the planning application, the BSR is content with the fire safety design as set out in the project description, to the extent it affects land use planning considerations. However, the BSR has identified matters that the applicant should try to address in advance of later regulatory stages.

2. Supplementary information

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

Photovoltaic (PV) Panels

- 2.1. The proposed roof plan drawing shows that the new proposal includes provision of photovoltaic panels on the roof. Where the roof top installation of PV panels is proposed, it should be noted that fire safety standards require suitable support of cabling to avoid obstruction of escape routes and firefighting access due to the failure of fixings and consideration should be given to ensure that all power supplies, electrical wiring, and control equipment is provided with appropriate levels of protection against fire.

Green Roof

- 2.2. The proposed floor plans drawings show the proposed installation of a green roof at levels L1 and L5. A green roof may constitute a fire hazard as it requires a regular management and maintenance regime, and the external envelope of a building should not provide a medium for undue fire spread. Where a green roof is proposed, sufficient fire resistance to prevent fire spread to any adjoining roofs/wall(s) will be required. It will be for the applicant to demonstrate that the proposed green roof is viable in relation to fire safety at later regulatory stages.
- 2.3. Guidance for green roofs can be found in [Fire performance of green roofs and walls - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/fire-performance-of-green-roofs-and-walls), published by the Department for Communities and Local Government. Where regulation 7(2) applies, that regulation prevails over all the provisions in this paragraph.

Yours sincerely


Sorin Bucur
Fire Safety Information Assessor

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

The scope of this substantive response is limited to fire safety matters that are material to land use planning considerations. This does not include matters relating to the determination of an application for:

- building control approval,
- a completion certificate, and
- a building assessment certificate.

This response does not provide advice about compliance with London Plan or local plan policy