

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	Gravesham Borough Council
LPA planning ref no	20250749
Our ref	25-0823
Site address	Carl Ekman House, Tooley Street, Northfleet, Gravesend, Kent, DA11 9PN
Proposal description	Conversion of existing store and vacant area into office space. Conversion of separate store into pram and cycle storage spaces with enhancements to the communal area with installation of secure door between entrance lobby and corridor. The front entrance landscape will be updated from grass to a resin surface with two types, and wooden planters installed.
Date on fire statement	14/05/2025
Date consultation received	07/10/2025
Date response sent	17/10/2025

1. Substantive response for the local planning authority

Thank you for consulting HSE about this application.

Headline response from HSE
Headline Response from HSE ('content')

Scope of consultation

- 1.1. The above consultation relates to “Carl Ekman House”, an existing 14 storey (41.6m) building. The building contains residential flats on floors 1 – 14 with the ground floor containing a vacant space currently being used for storage and refuse.
- 1.2. The proposal seeks the change of use of the ground floor from class B8 to class E, to change the vacant space to office space, a separate pram (x18) and cycle store (x15). Changes also include improvements to the communal area, adding a new door to provide additional protected lobby and changes to the landscape.

- 1.3. The building is served by a single protected stair with dry rising fire main, and does not contain a firefighting shaft or firefighting lift (the fire statement states that the lift is a “firemans” lift).
- 1.4. Section 6 of the fire statement confirms that the development has been designed using Approved Document B Volume 1 (‘ADBv1’). HSE has assessed the application on that basis.

Consultation

- 1.5. Following a review of the information provided in the planning application, HSE is content with the fire safety design as set out in the project description, to the extent it affects land use planning considerations.

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.

External wall

- 2.1. It is noted the above application includes the installation and replacement of windows and doors. Whilst window/door frames and glass are exempt from the regulations regarding fire performance classifications of relevant building external walls, it is advised that there is a potential risk that any replacement work could affect the integrity of fire safety precautions such as fire resisting cavity barriers around openings in external walls. The applicant is advised that persons with competence in fire safety should undertake the proposed works.
- 2.2. It is also noted that section 6 of the fire statement confirms that the external wall system achieves the European Classification of A2-s1,d0 or better. It will be for the applicant to demonstrate compliance at later regulatory stages.

Building Safety Regulator

- 2.3. For information, HSE advises that all higher risk buildings are now required to be registered with the Building Safety Regulator (‘BSR’). Once the building has been registered, the BSR will invite accountable persons to submit a safety case for their buildings. [Applying to register a high-rise residential building - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/applying-to-register-a-high-rise-residential-building).
- 2.4. It will be for the accountable person to submit a safety case to demonstrate how the building’s safety risks are managed. This would include the risks to the safety of people in or about a building arising from the spread of fire, including the spread of fire over external walls.

Yours sincerely

A solid black rectangular box used to redact the signature of the Fire Safety Information Assessor.

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