

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	20221064
Our ref	pgo-4905
Site address	Northfleet Harbourside - Land Surrounding Ebbsfleet United Football Club, Stonebridge Road, Northfleet
Proposal description	Outline planning application with all matters reserved, except for the primary means of access and road layout, for a phased mixed-use redevelopment involving the demolition of existing buildings and structures including site preparation / remediation works, and the development of residential units (Use Class C3), Class E uses including floorspace for retail Class E(a)), food/beverage and drinking establishments (Use Class E(b)), local services (Use Class E(c)), indoor sport/recreation/fitness (use Class E(d)), healthcare space (Use Class E(e)), creche/nursery uses (Use Class E(f)), office floorspace (Use Class E(g)(i)), a new multi-use stadium with associated business and leisure facilities (sui generis), hotel (Use Class C1), community uses floorspace (Use Class F2). The phased redevelopment will include other sui generis uses, delivery of open space and significant realignment of the road network including the A226 Galley Hill Road / Stonebridge Road / Lower Road with hard / soft landscaping, car and cycle parking provisions, infrastructure works, ancillary and associated works.
Date on fire statement	N/A
Date consultation received	05/03/2024
Date response sent	25/03/2024

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 consultation relates to an Outline planning application with all matters reserved, except for the primary means of access and road layout, for a phased mixed-use redevelopment involving the demolition of existing buildings and structures and the development of residential units, including floorspace for retail, food/beverage and drinking establishments, local services, indoor sport/recreation/fitness, healthcare space, creche/nursery uses, office floorspace, a new multi-use stadium with associated business and leisure facilities, hotel and community uses floorspace.

Previous consultation

- 1.2. HSE issued a substantive response (Further Information Required) dated 05/10/2023, under the reference pgo-3909 in relation to a consultation received on 06/09/2023.

Current consultation

- 1.3. The current consultation was received on 05/03/2024 providing further information and swept path analysis plans, dated 23/02/2024, ('the applicant's response'). For the avoidance of doubt, this substantive response is in relation to the applicant's response.
- 1.4. Based on information provided by the applicant, it is unclear whether suitable access routes have been provided for a fire appliance to all relevant buildings. For instance, there is no information available relating to:
- tracking routes for fire appliances to within 18m of buildings dry riser inlets; and
 - appropriate turning facilities for fire appliances.
- 1.5. As access and road layout are matters under consideration, and following a review of further information provided in the planning application, HSE is raising a fire safety concern described below.

Fire service access and facilities

- 1.6. Drawings illustrate a road with dead end conditions to the north east of the development, 'Riverside Neighbourhood'. A fire appliance would be required to reverse a considerable distance along the road in order to complete a turning manoeuvre. Siting of the pump to 'Parkland Neighbourhood', the north west of the development, furthestmost building, appears to suggest a fire appliance could not achieve a suitable distance to the dry riser inlet location. This would be the same for the stand alone building, adjacent the Thames river, which forms part of the 'Riverside Neighbourhood'.
- 1.7. A fire appliance requires a minimum of 3.7m road width between kerbs. Dead end access routes will require turning facilities so that a fire appliance does not have to reverse more than 20m from the end of the access road. For buildings fitted with dry fire mains, access should be provided to within 18m of each fire main inlet point, located on the face of the building, visible to the fire appliance.

- 1.8. Access road specifications, to include vehicle tracking, should therefore be reviewed to ensure suitability for fire appliances. Any design changes necessary to ensure that suitable fire service access is available will affect land use planning considerations such as the landscaping of the development and access arrangements more generally.
- 1.9. Should the Local Planning Authority be minded to grant outline planning permission, we strongly recommend the following:
- The outline planning permission is subject to a suitable condition requiring the submission of a further satisfactory fire statement with any reserved matters application; and,
 - That HSE is consulted in conjunction with the Local Planning Authority's consideration of any reserved matters application.

This would ensure the purpose of HSE being made a statutory consultee for such applications is achieved. HSE recommends the submission of a fire statement form, using the template published by the Secretary of State. This is available online at [Planning application and fire statement forms: templates - GOV.UK \(www.gov.uk\)](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/281111/Planning_application_and_fire_statement_forms_templates.pdf)

Yours sincerely



Ysanne Spafford
Fire Safety Information Assessor

Guidance on Planning Gateway One is available on the Planning Portal: [Planning and fire safety - Planning Portal](https://www.planningportal.co.uk/advice-and-guidance/development-types/major-developments/planning-gateway-one/).

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

