

Substantive response

Substantive response 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	20221111
Our ref	pgo-2161
Site address	Joyes House New Road Gravesend Kent DA11 0AJ
Proposal description	Application for prior approval under Part 20 Class AA of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) for upward extension of existing commercial building through the construction of 2 additional storey to provide 24no. flats along with necessary ancillary works.
Date on fire statement	14/10/2022
Date consultation received	19/10/2022
Date response sent	08/11/2022

Headline response from HSE
Headline Response from HSE 'Advice to LPA' - Some Concern

1. Substantive response for the LPA

Thank you for consulting HSE about this application.

« Nature of Response Advice provided to the planning authority Nature of Response »

Scope of consultation

- 1.1 The above consultation relates to an application for prior approval under Part 20 Class AA of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) for upward extension of existing commercial building through the construction of 2 additional storey to provide 24 flats along with necessary ancillary works.

- 1.2 The fire statement dated 14/10/2022 states that the adopted fire safety design standard is BS 9991. HSE has assessed the application on that basis.

External wall systems

- 1.3 Section 6 of the fire statement states in relation to fire performance classifications of external wall systems: *'class A2-s1, d0 or better This applies to the EW systems of the proposed floors and is reported to apply to the existing external wall systems of Joynes House'*.
- 1.4 This is noted. However, page 5 of the design code document, and section 4.3 of the Planning Statement indicate that timber cladding will be installed on the external walls of the proposed extension). Page 4 of the design code also indicates the use of timber railway sleepers permanently incorporated into the balconies.
- 1.5 As timber is combustible, it is unclear from the information provided whether the proposed cladding materials will meet the minimum fire performance classification for a relevant building. All materials used in external walls of relevant buildings, or attachments to external walls (such as balconies), must have a minimum fire performance classification of class A2,s1-d0. Design changes necessary to ensure that only suitable materials are used in external wall systems will affect land use planning considerations such as the appearance of the development.

Means of escape

- 1.6 The 5th floor drawing contains annotation that the east staircase is for residential use only. However, it is unclear whether the west staircase connects both residential and commercial uses. The adopted fire safety standard, BS9991, states that any staircase serving a dwelling within a mixed-use development should not communicate with any other occupancy.
- 1.7 Accordingly, it should be clarified whether the staircase serves residential and commercial uses. Any design changes necessary to separate the west staircase from commercial uses, will affect land use planning considerations such as layout and appearance of the development, and potentially the space available for and number of dwellings.

2. Supplementary information

The following points do not contribute to HSE's overall headline response.

- 2.1 The proposed fifth and sixth floor plan drawings indicate distances of approximately 38m from the firefighting staircase door (from which firefighters will travel as the firefighting bridgehead will be in the firefighting shaft) to the door of the remote flat. Fire safety guidance on control smoke in flats states:

'Whilst 30m might seem like an arbitrary figure to some, firefighting from long corridors can present exceptionally onerous conditions for firefighters. Essentially, the corridor itself can become the fire compartment once the flat front door is either breached by the fire, opened by escaping residents or by firefighters';

and,

'...designers should be aware that single direction travel distances over 30m in length (measured from the staircase door to the furthest flat entrance door) in common escape routes are considered to present onerous conditions for fire fighters even if the flats are fitted with suppression systems'.

- 2.2 In this instance, however, internal alterations of door locations necessary to reduce the firefighter travel distance, are unlikely to affect land use planning considerations. This matter will, however, be subject to later regulatory assessment.

Yours sincerely,

08/11/2022

A handwritten signature in black ink, appearing to read 'Jon Bryan', is positioned above a solid black horizontal line.

Signed by: jon.bryan

This substantive response provides fire safety advice to the local planning authority. It's based on the information provided as it relates to land use planning.

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