

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	20220799
Our ref	pgo-1833
Site address	Joynes 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	13/09/2022
Date consultation received	09/09/2022
Date response sent	22/09/2022

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.

Means of escape

- 1.2 Section 14 of the fire statement states *'The central core stair will also serve as the firefighting shaft serving all floors'*. 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. Design changes necessary to provide separated staircases serving the proposed dwellings, and 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.

External walls

- 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 refer to the existing external wall systems of Joynes House'*. This is noted, however, drawings appear to show cladding systems of unknown material installed on the existing exterior walls of staircases. Any material used in the external walls of a relevant building must meet the minimum fire performance classification termed class A2-s1, d0. Any design changes necessary to ensure that only suitable materials are used in external walls may affect land use planning considerations such as the appearance of the development.

Fire service access

- 1.4 The proposed fifth and sixth floor plan drawings indicate distances of approximately 40m from the firefighting staircase door to the door of the remote flat. Fire safety guidance on control smoke in flats states:
- 1.5 *'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*
- 1.6 *'...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'.*
- 1.7 Design changes necessary to provide suitable firefighter travel distances will affect land use planning considerations such as the layout and appearance of the development.

2. Supplementary information for the applicant

The following points do not contribute to HSE's overall headline response and are intended only as advice for the applicant. These comments identify items that could usefully be

considered now to reduce the risk of making changes to the design at a later stage, which could have planning implications.

2.1 Drawings show the firefighting lift is open to the firefighting staircases. A firefighting lift should not be sited within the enclosure of a firefighting staircase. The resolution of this matter will, however, not affect land use planning considerations. Separation between the lifts and firefighting staircase will, however, be required.

2.2 Section 6 of the fire statement indicates that sprinklers will be installed. However, it is unclear whether sprinklers will be installed in the existing storeys of the new relevant building. Fire safety guidance provides blocks of flats with a top storey more than 11m above ground level should be fitted with a sprinkler system throughout the building.

2.3 It should also be noted that the Department for Levelling Up, Housing and Communities has published answers to frequently asked questions on 23/08/2022, about Approved Document B: Fire safety - frequently asked questions available online which states:

"20. I am undertaking work on an existing building which is below 11m, and adding a new floor which will exceed 11m in height, do I need to sprinker the whole building or just the new floor?"

Each case must be considered on its own merits, but it is likely that where additional storeys are added to an existing building, some work on the original part of the building will be necessary.

Applicants and building control bodies are reminded of the need to consider these new provisions sprinklers in relation to extensions as required by Regulation 4(1). New accommodation, formed by building work, should meet the relevant requirements having considered the guidance in the approved document. This means ensuring that the standard of fire protection for the occupants of the new accommodation is as would be provided for a new building under the approved document. In the majority of cases, therefore, sprinkler protection will be necessary in any newly formed accommodation that falls above the new 11m trigger height."

Yours sincerely,

22/09/2022

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

Gravesham Borough Council