

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	Southwark
LPA planning ref no	21/AP/4297
Our ref	pgo-2213
Site address	Avonmouth House 6, Avonmouth Street, London, Southwark SE1 6NX
Proposal description	Demolition of existing building and structures and erection of a part 2, part 7, part 14, and part 16 storey plus basement development comprising 1,733sqm (GIA) of space for Class E employment use and/or community health hub and/or Class F1(a) education use and 233 purpose-built student residential rooms with associated amenity space and public realm works, car and cycle parking, and ancillary infrastructure.
Date on fire statement	25/05/2022
Date consultation received	27/10/2022
Date response sent	17/11/2022

Headline response from HSE

Headline Response from HSE ('content')

1. Substantive response for the local planning authority

Thank you for consulting HSE about this application.

« Nature of Response HSE is satisfied with the information provided with the application (including the fire statement). » Nature of Response »

Scope of consultation

- 1.1 The above application relates to the development of a student accommodation building that contains 16 storeys and 2 basement levels. It is noted in the fire statement (section 6) that the building is 55.325 m in height and is served by a single stair that represents the escape stair as well as the firefighting stair.
- 1.2 It is noted on the fire statement (section 6) that the fire safety standards used to design the proposed development are BS 9991 for the residential area and BS 9999 for the non-residential area. HSE has assessed the application on that basis.

Previous consultation

- 1.3 HSE received the first consultation request on 18/01/2022 for the aforementioned planning reference and responded on 18/01/2022, under the HSE reference pgo-0793, with the headline: 'Significant Concern'.

Current consultation

- 1.4 HSE received a subsequent consultation request on 27/10/2022. The email from the LPA contains revised plan drawings and a response from the applicant in relation to pgo-0793, referred from this point onwards as “the applicant’s letter”. It is also noted that on the planning register a new fire statement dated 25/05/2022, is available.
- 1.5 Following a review of the information provided in the planning application, HSE is satisfied with the fire safety design to the extent that it affects land use planning.

2. Supplementary information

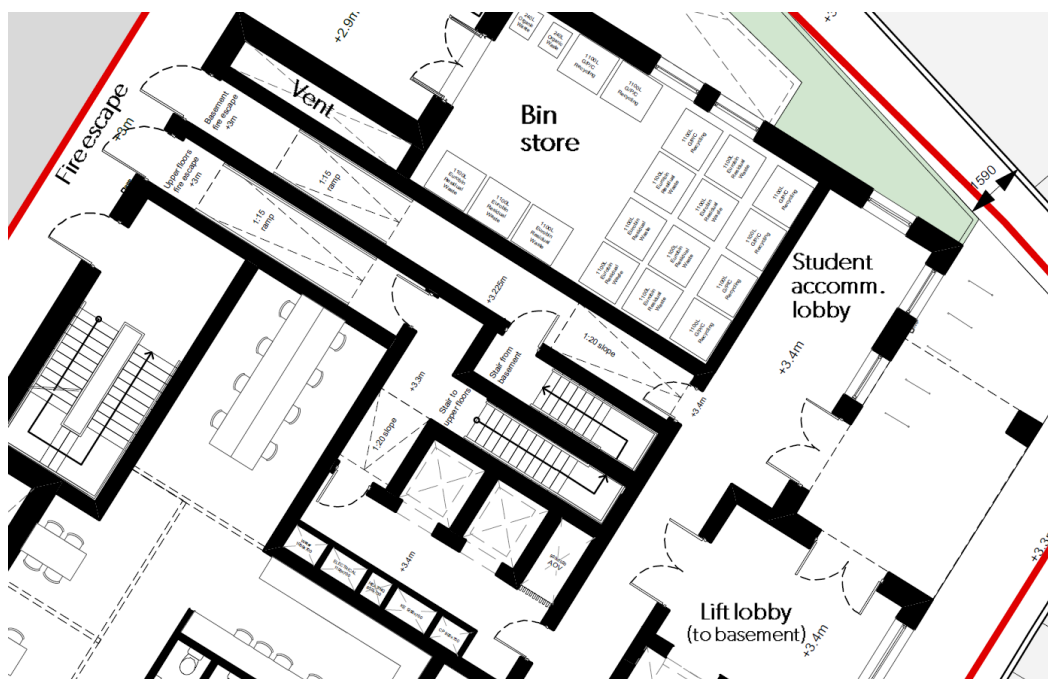
The following information does not contribute to HSE's substantive response.

Means of escape and fire service access

- 2.1 Previously, HSE raised a concern about the single stair connecting with the basement level -2. In relation to this, the applicant's letter states:

“The internal arrangement at ground floor has been redesigned. The staircase serving the upper student accommodation floors is now separated from the staircase serving the basement -2 level. At ground floor, each staircase has its own separate independent egress route directly to the external fire escape route along the north-west side of the building.”

- 2.2 It is noted that the revised ground floor plan illustrates the proposed solution. HSE welcomes this approach which appears acceptable, subject to later regulatory consideration.



- 2.3 Previously HSE raised a concern about the single stair connecting with ancillary areas at the ground floor such as an office, post room and concierge area. It is noted on the revised ground floor that these areas have been removed. HSE welcomes this approach, subject to later regulatory consideration.
- 2.4 Previously, HSE raised a concern about lifts in a single stair building, continuing down to the basement level -2. In relation to this, it is noted that the lifts serving the upper floors no longer serve the basement level -2. HSE welcomes this approach and notes that there are two different lifts serving this level.
- 2.5 Previously, based on the building height provided in the fire statement (i.e., 55.325 m), HSE raised a concern about the development being provided with a dry fire main instead of a wet fire main, which is requested for a building that has at least 50 m in height.
- 2.6 In relation to this:
- the applicant's letter states:
"The finished level of the topmost habitable floor is 49.65 m from ground level. We understand therefore that a wet riser is not required."
 - the new fire statement (section 10) states:
*"The residential premises will be provided with one residential type firefighting core (comprising a firefighting lift and evacuation lift, a firefighting stair including a wet rising main, connected by the protected residential lobbies).

The wet rising main inlet point for the residential premises will be located on the face of the building, within 18m and a clear line of sight from the fire service appliance parking location."*
- 2.7 It is noted that the applicant's letter is contradictory with the fire statement completed by the fire engineer.
- 2.8 It should be noted that the cited guide used as the fire safety design for this development states:
- *"Where there are no floors higher than 50 m above ground level, wet or dry fire mains may be installed."*
 - *"Early consultation with the appropriate approving authorities (including the fire and rescue service and building control bodies) is advised when deciding which facilities should be provided."*
- 2.9 Therefore, wet fire mains can be installed, as proposed in the new fire statement, even if the topmost habitable floor is below 50 m in height.
- 2.10 In this instance, the height is subject to only 0.35 m difference to reach the threshold of 50 m, when the provision of a wet fire main is mandatory. In this context, as mentioned in the fire statement, the Fire and Rescue Service may also require that a wet fire main should be provided to this development.

2.11 The provision of a wet fire main will require a water tank, pumps, and a secondary electrical power supply (e.g., an automatically started generator or a supply from another substation) which will take additional space from the proposed development, and which may affect land use planning. This issue is likely to be picked up again at a later regulatory stage.

2.12 Previously, HSE raised a concern about the final exit of the escape route being next to a bin store. In relation to this, the applicant's letter states:

"The amended design ... results in the relocation of fire escape exit doors and a clear escape route directly to the street without any need to pass the bin store."

2.13 HSE notes the change to the ground floor plan and welcomes this approach.

2.14 Previously, HSE raised a concern about the access to the firefighting shaft via the concierge which connects with ancillary accommodation. In relation to this, the applicant's letter states:

"The amended design removes the ancillary accommodation."

2.15 HSE notes the change to the ground floor plan and welcomes this approach.

2.16 Previously, HSE raised a concern about a flat at each upper floor having the exit door directly into the firefighting lobby which serves the cluster accommodation. In relation to this, the applicant's letter states:

"The upper floor plans do show a flat entrance and exit discharging into the Firefighting lobby. This complies with guidance as detailed in BS 9991 where diagram 35 also shows a flat entrance and exit discharging into the firefighting lobby."

"...the lift and the staircase are protected by the flat entrance door and the fire door provided on both the staircase shaft and the lift shaft..."

2.17 This issue is subject to later regulatory consideration.

Yours sincerely

17/11/2022



Fire Safety Information Assessor
Signed by: Ciprian Burtilla

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.

It takes into account any fire safety information from section 9 of the fire statement form (where 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
- London Plan policy compliance