

# Substantive response

Substantive response from the Health and Safety Executive (HSE) to the local planning authority (LPA) as a statutory consultee.

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| <b>To LPA</b>  | LB Southwark   |
| <b>LPA planning ref no</b>   | 21/AP/4297   |
| <b>Our ref</b>   | pgo-0793   |
| <b>Site address</b>  | Avonmouth House 6, Avonmouth Street, London, Southwark SE1 6NX   |
| <b>Proposal description</b>  | 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. |
| <b>Date on fire statement (Date the fire statement was completed)</b>      | 27/10/2021   |
| <b>Date application received (Date HSE received notification from LPA)</b> | 18/01/2022   |
| <b>Date response sent (Date HSE sent substantive response to LPA)</b>      | 07/02/2022   |

## Headline response from HSE

Headline Response from HSE **['Advice to LPA' - Significant Concern]**

## 1. Substantive response

Thank you for consulting HSE about this application.

◀ Nature of Response Advice provided to the planning authority Nature of Response ▶

### Means of escape and fire service access

1.1 The fire statement (section 2) states that the above ground floors will be served by a single stair core, which will be designed as a firefighting stair. The plan drawings illustrate the

proposed stair continuing down to the basement level 2 and connecting with the ancillary areas. The fire safety guidance and standard require that, in single stair buildings, the stair should not continue down to the basement and the same applies to the firefighting lifts. This is due to the risk of smoke and heat from the basement compromising the means of escape and fire service access. Additionally, where a common stair forms part of the only escape route from a flat, it should not serve any ancillary accommodation. The proposed solution, illustrated on the ground floor plan, to separate the stairs at the ground level is acceptable only in small buildings, under 11 m height. Resolving this issue may affect land use planning considerations such as design and layout of the building.

- 1.2 The fire statement (section 6) states that the proposed building is over 50 m and that a dry fire main will serve the firefighting shaft (fire statement, section 10). Where there are floors higher than 50 m above firefighting access level, wet fire mains should be installed because of the pressures required to provide adequate water supplies at the landing valves at upper floors and to ensure that water is immediately available at all floor levels. The provision of a wet fire main will require water tanks and pumps which is likely to affect land use planning considerations such as design and layout of the building.
- 1.3 The ground floor plan illustrates the final exit for the escape route from the common stairs next to the bin store. The fire standard states that the access to refuse storage chambers should not be sited adjacent to escape routes or final exits. Further engineering analysis may be necessary to determine if a fire emanating from the bin store, could impede escape from the residential accommodation. Any consequent design changes may affect land use planning considerations such as design and appearance of the building.
- 1.4 The ground floor plan illustrates the access for firefighters to the firefighting shaft via the concierge which connects with ancillary accommodation. The entry to a firefighting shaft should be available either directly from the open air or by way of a protected corridor, which should not be used as a circulation space and should be separated from adjoining accommodation by lobbies. Resolving this issue may affect land use planning considerations such as design and layout of the building.
- 1.5 The upper floor plan drawings illustrate each floor having a flat with the exit door directly to the firefighting lobby. The access to the accommodation from the firefighting lift or stair should be through a firefighting lobby, as a single fire door cannot provide adequate protection to the firefighting stair and lift, from a fire in the accommodation. Resolving this issue may affect land use planning considerations such as design and layout of the building.

## 2. Supplementary information

*The following points do not contribute to HSE's overall headline response and are intended only for guidance/clarification purposes. These comments identify items that may have implications for planning and could usefully be considered now.*

- 2.1 It could not be confirmed from the information provided if there are disabled refuge points provided to the upper floor. Consideration should be given to the interaction between the disabled refuges and the dry riser outlets in the firefighting stair. The presence of charged fire hoses could hinder effective use of the disabled refuge; likewise, the use of a refuge could prevent access to the dry riser outlet. Ensuring the provision and location of disabled

refuges is suitable may affect land use planning considerations such as the layout of the building, and disabled persons' access.

Yours sincerely

07/02/2022



Fire Safety Information Assessor  
Signed by: Ciprian.Burtila

**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**