

Advice to the local planning authority

Advice to the local planning authority (LPA) from the Building Safety Regulator (BSR) as a statutory consultee for developments that include a relevant building.

To LPA	The Planning Inspectorate
LPA planning ref no	S62A/2026/0159
Our ref	26-0925
Site address	Maple House, Nos 8-16 (even) & 30-32 High Street and nos 1-7 Princes Parade, EN6 5BA
Proposal description	Partial demolition of existing buildings (with retention of existing two-storey car park and substation) and redevelopment of the site to provide a mixed-use development comprising residential apartments (class C3) and flexible commercial floorspace (class E) across 4 blocks and associated internal roads, parking, drainage, landscaping, amenity space and associated works.
Date on fire statement	22/06/2026
Date consultation received	19/08/2026
Date response sent	26/08/2026

1. Substantive response for the local planning authority

Thank you for consulting the BSR about this application.

Headline response from the BSR
Headline Response ('Content')

Scope of consultation

- 1.1. The above application relates to redevelopment of the site to provide a mixed-use development comprising residential apartments (class C3) and flexible commercial floorspace (class E) across 4 blocks.
- 1.2. The mixed-used development comprises several blocks ranging from 4 to 15 storeys in height containing 293 homes.

- 1.3. The developments consists of:
- **Block A:** 15-storeys with a height of 44.3m
 - **Block B:** 06-storeys with a height of 17.1m
 - **Block D:** 05-storeys with a height of 13.95m
 - **Block E:** 04-storeys with a height of 9.45m
 - Blocks A, B and D will have commercial units located at ground floor level; Block E will include only residential accommodation.
 - The commercial units in Blocks A, B and D will not connect to the residential areas.
- 1.4. Block A is a relevant building, Blocks B, D and E are not relevant buildings but may be within the curtilage of a relevant building. The BSR has included Blocks B, D and E as part of this assessment, particularly regarding fire service access and external fire spread to the extent that this impacts on the relevant building (Block A).
- 1.5. Relating to external fire spread, section 7 of the fire statement states: ***“For Blocks A, B and D all of the materials which become part of an external walls (other than those exempted by the regulation) will achieve European Classification A2-s1,d0 or Class A1... Block E is less than 11m in height and is positioned more than 1m from the relevant boundary, there are no restrictions on external wall surface spread of flame.”***
- 1.6. The fire statement dated 22/06/2026 states that the adopted fire safety design standards are BS 9991 and BS 9999. The BSR has assessed this application on that basis.

Consultation

- 1.7. Regarding the means of escape within Block A (relevant building), Section 7 of the fire statement states: ***“Block A will be provided with two stairs (one firefighting stair and one escape stair). All stairs will serve every level within each building.”***
- 1.8. Relating to fire service access and facilities, section 7 of the fire statement states:
- ***“Block A will exceed 18m in height; therefore, it will be provided with a firefighting shaft comprising a firefighting stair, firefighting lift, and firefighting main (dry riser).***
 - ***Blocks B, D and E will be provided with dry risers located within the escape stairways.***
 - ***Fire and Rescue Service vehicle access will be provided within 18m of, and in sight of, the fire main inlet points (located on the face of the building).***
 - ***Vehicle access to the commercial units will be provided to 15% of their perimeter”***
- 1.9. Following a review of the information provided in the planning application, the BSR is content with the fire safety design as set out in the project description, to the extent it affects land use planning considerations. However, the BSR has identified some matters as supplementary information, set out below, that the applicant should try to address, in advance of later regulatory stages.

2. Supplementary information

The following information does not contribute to the BSR's substantive response and should not be used for the purposes of decision making by the local planning authority.

Smoke Control System

- 2.1. Section 7 of the fire statement states: ***“Block A will have floors over 30m above ground level, therefore, all common corridors that serve apartments will be provided with a mechanical smoke ventilation system (MSVS) via a minimum of 0.6m² smoke shaft located in the dead end of the corridor. Replacement air to the stairways will be provided via 0.6m² natural air supply shafts within the lift lobby and via a 1.0m² AOV located at the head of each stair.***
The proposed smoke control strategy will be validated using Computational Fluid Dynamics (CFD)....”
- 2.2. Additionally, and relating to Block A, paragraph 3.4.3.1 of the Fire Strategy states: ***“The proposed smoke venting strategy will be validated via a Computational Fluid Dynamics (CFD) assessment, which will be carried out at a later stage of the design. Subject to the modelling results stairway doors may also need to swing to outwards to improve the ventilation performance.”***
- 2.3. The BSR acknowledges the applicant's comments regarding the smoke ventilation system and the proposed CFD validation. Accordingly, it will be for the applicant to demonstrate that appropriate means of escape are provided at later regulatory stages. However, if the CFD modelling does not support the design, any subsequent redesign may affect land use planning considerations and the applicant should seek the advice of the LPA about the materiality of any proposed design changes, if required.

External fire spread: Block D – adjacent car park

- 2.4. Paragraph 6.2 of the Fire Strategy states: ***“The west elevation of Block D overlooks an existing enclosed car park. The car park is of brick construction however, the fire resistance of its external wall and its applicable boundary condition are unknown. The car park extends to approximately first floor level of Block D.***

On this basis, the potential for external fire spread between the ground floor of Block D and the adjacent car park has been considered. Given the uncertainty regarding the required boundary distance for the car park, a conservative approach has been adopted. Accordingly, the west elevation of Block D at ground floor should be treated as a boundary condition requiring full fire protection, with only limited unprotected areas permitted (see Figure 29).

At upper levels, no additional protection to the external wall is considered necessary. This is on the assumption that the car park will not be extended vertically, nor be replaced with a taller structure as part of any future development.”

- 2.5. The BSR notes the commentary regarding the car park to Block D and the proposed ground floor only boundary condition requiring full fire protection. The assessment considers external fire spread from the adjacent car park structure. It is not explicit

whether the potential thermal output and flame projection from a vehicle fire within the car park has been assessed.

- 2.6. Given the proximity of the car park to the west elevation of Block D, a fire involving a vehicle could expose the façade to significant radiative heat and flame impingement, increasing the risk of fire spread to the building. Confirmation may be required that the adopted protection measures to the west elevation of Block D remain adequate for a foreseeable vehicle fire scenario.
- 2.7. Accordingly, it will be for the applicant to demonstrate compliance at later regulatory stages.

Open plan apartments

- 2.8. Section 7 of the fire statement states: ***“Blocks A, B and D will have open-plan apartments. In line with the recommendations of BS 9991:2024, occupants escaping from bedrooms should not have to make their escape past a kitchen due to the sleeping risk. Therefore, cooking facilities shall be located remote from the main entrance door and should not impede the escape route anywhere in the flat. This recommendation will be met for the majority of apartments, where kitchen hobs will be located at least 1.8m away from the escape routes with a minimum width of 900mm for the escape routes. The escape route from adjoining habitable rooms and balconies past the hob shall be unobstructed.”***
- 2.9. The BSR acknowledges the applicant’s comments. Accordingly, it will be for the applicant to demonstrate compliance at later regulatory stages.

Block B – Fire Curtain

- 2.10. Paragraph 3.4.5 of the Fire Strategy states: ***“In Block B, the final exit route from the stair will also provide access to the amenity lobby. It is proposed that this connection be protected by a 60 minutes fire curtain in conjunction with an FD60S fire door, in lieu of a protected ventilated lobby. No connections will be provided between the final exit route and ancillary spaces.”***
- 2.11. The BSR acknowledges the applicant’s comments regarding the provision of a fire curtain within Block B (non-relevant building). Accordingly, it will be for the applicant to demonstrate compliance at later regulatory stages.

Hydrants

- 2.12. Section 12 of the fire statement states: ***“There are existing hydrants on site. However, to provide the recommended hydrant coverage, three private hydrants are proposed to be provided within 90m for the fire main inlets / building entrance points...”***
- 2.13. The BSR acknowledges the applicant’s comments regarding the proposed ‘three private hydrants’. Accordingly, it will be for the applicant to demonstrate compliance at later regulatory stages.

Yours sincerely

Stephen Gallagher

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Fire Safety Information Assessor

Guidance on Planning Gateway One is available on the Planning Portal: [Planning and fire safety - Planning Portal](#).

The scope of this substantive response is limited to fire safety matters that are material to land use planning considerations. This does not include matters relating to the determination of an application for:

- building control approval,
- a completion certificate, and
- a building assessment certificate.

This response does not provide advice about compliance with London Plan or local plan policy.