

Advice to the local planning authority

Advice 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	Worthing
LPA planning ref no	AWDM/1329/25
Our ref	25-1028
Site address	Car Park Adjacent Sandell House Railway Approach Worthing West Sussex
Proposal description	Erection of a five to seven storey building with 29 self-contained residential units (Use Class C3) including undercroft parking and cycle store linked to listed building
Date on fire statement	17/10/2025
Date consultation received	26/11/2025
Date response sent	17/12/2025

1. Substantive response for the local planning authority

Thank you for consulting HSE about this application.

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

Scope of consultation

- 1.1. The above planning application is for the erection of a 4 to 6 storey apartment block above undercroft parking. The apartment block will consist of 29 apartments including 20% affordable housing. No basement storeys are proposed. The building will have a top storey height of 18.60m.

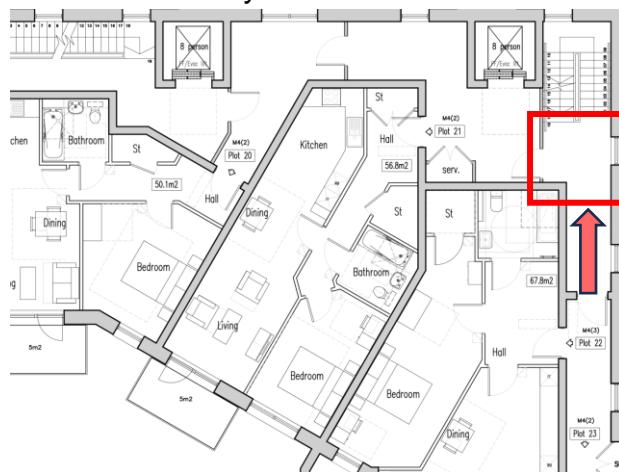
- 1.2. All floors are residential except the ground floor which has surface undercroft parking.

- 1.3. Section 6(e) of the fire statement confirms that Approved Document B, Volume 1 has been used in the design of the building. Although section 7 of the fire statement states; *"The apartment block will be designed in strict accordance with BS9991:2024 (Incorporating Corrigendum No. 1).*" HSE has assessed this application on that basis.

- 1.4. Following a review of the information provided, HSE has concerns in relation to fire safety matters, specifically regarding the horizontal means of escape, the smoke control system specification and associated design analysis, and the provision of fire safety information.

Means of escape - horizontal

- 1.5. Plan drawings show that for plots 27, 26, 23, 22, 18, 17, 12, 11, 6 and 5, to access the alternate stair the occupiers must pass through an open stair enclosure. Therefore, should this stairway be compromised, occupants of these plots would be trapped, unable to access the alternate stairway.



- 1.6. BS9991 section 10 (Protection of common stairs) states; *"In buildings with a storey 18m or more above ground level, one or more common stairs should be designed as firefighting stairways (see 46.3.5).*

In all buildings, the following recommendations should be met.....

c) If any storey or part of a storey is required to have more than one escape route, common stairs should be sited such that access to alternative common stairs is possible from any point on that storey without passing through any other such stairway."

- 1.7. Additionally, Section 3.33 of ADB v1 states: *"An escape route should not pass through one stair enclosure to reach another. It may pass through a protected lobby (minimum REI 30) of one stair to reach another."*

- 1.8. Design changes to separate the corridor from the staircase will affect the window position (see drawing extract below) and the size of the adjacent flat. . This will affect the layout and appearance of the building and space available for dwellings. It will be for the applicant to demonstrate that the means of escape is capable of being safely and effectively used at all material times, including during firefighting operations.



Smoke Control Provision

- 1.9. No information has been provided regarding if a smoke control system is employed, (either natural or mechanical), within the fire shaft, protected stairs (labelled FF/Evac Lift) or the undercroft parking area. It will be for the applicant to demonstrate that the means of escape is capable of being safely and effectively used at all material times, including during firefighting operations, and if fire engineered solution(s) are used, that they provide an equivalent level of fire safety to that of code compliance. Accordingly, HSE requests information on the smoke control proposals in these areas.

- 1.10. Additionally, there is no indication of how smoke from a car park fire will be vented to outside. Smoke generated by a car park fire will be hot, toxic, may contain combustible gases, and will require venting to fresh air via open vents or mechanical extraction fans. When identifying locations for, and types of smoke vents, the risk of hot smoke re-entering the building, or affecting escape routes, or fire service access points, must be considered. Accordingly, HSE requests information on the smoke control proposals for the car park. This may affect the layout, landscape, and appearance of the building.

Design Analysis

- 1.11. Section 6(i) of the Fire Statement identifies that residential sprinkler installations are proposed for the building. Approved Document B ('ADB' 2019, incorporating 2020 and 2022 amendments) states that: "*blocks of flats with a top storey more than 11m above ground level should be fitted with a sprinkler system throughout the building.*" Note: *Sprinklers should be provided within the individual flats, they do not need to be provided in the common areas such as stairs, corridors, or landings when these areas are fire sterile.*" No information is provided regarding the provision of a sprinkler installation within the covered car park.

1.12. Although the ground floor car park, located beneath the building appears to be open sided on two elevations, which would provide a level of natural ventilation. Should the natural openings fall short of the minimum free area required under Approved Document B or BS 7346-7, mechanical ventilation may be necessary to ensure compliance with fire safety objectives and to maintain tenable conditions in the event of fire.

1.13. Accordingly, HSE requests details of proposals for car park ventilation and the potential for external fire spread to other buildings from the car park. This may affect land use planning considerations such as appearance, and car parking provision.

1.14. It will be for the applicant to demonstrate that the means of escape is capable of being safely and effectively used at all material times, including during firefighting operations, and that an equivalent level of fire safety to that of code compliance is provided.

Fire Safety Information

1.15. Limited fire safety information is included within the fire statement specifically regarding fire service access and facilities. The site plan included provides only partial details regarding the accurate locations of hydrants and parking positions of fire service vehicles in relation to access to the building. Any design changes necessary to ensure that suitable fire service access and facilities are provided may affect land use planning considerations such as the landscaping of the development.

Accordingly, HSE requests a fire statement detailing (but not necessarily limited to) the following information:

- parking locations proposed for the fire appliances and associated distances in relation to the proposed dry fire main inlets.
- fire service access points to buildings and associated distances in relation to the proposed firefighting shafts.
- Dry fire main inlet and outlet locations.
- location of any evacuation assembly points.
- locations of water hydrants the proposals rely on and associated distances.
- An annotated fire service site plan

The fire statement should be completed as set out in the [Guidance: fire statement \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk)

1.16. Additionally, HSE has identified some matters that the applicant should try to address, in advance of later regulatory stages.

2. Supplementary information

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

Connection to ancillary

- 2.1. The plan drawings indicate the firefighting shaft, and the protected stair (FF/Evac Lift) connect to the covered undercroft car park area.
- 2.2. Fire safety standards state: "*In multi-stair buildings: ancillary accommodation should be separated from any stair by a protected lobby or protected corridor at the storey in which the accommodation is situated;*"
- 2.3. It is noted that the covered car park is used for means of escape from the protected stair, and that lobby protection for the firefighting shaft and the protected stair is not outlined within the design. It will be for the applicant to demonstrate that the means of escape is capable of being safely and effectively used at all material times, including during firefighting operations, and if performance-based solution(s) are proposed they provide an equivalent level of fire safety to that of code compliance.
- 2.4. Design changes to provide suitable lobby protection to ancillary areas is unlikely to affect land use planning where this matter can be resolved by way of internal alterations. It will be for the applicant to demonstrate compliance at later regulatory stages.

Fire service access and facilities.

- 2.5. The ground floor drawing show that access to the firefighting shaft is via the main entrance/post area.
- 2.6. Fire safety standard BS9999, which is complemented by BS9991, states: "*Entry to a fire-fighting shaft at fire and rescue service access level should be available either directly from the open air or by way of a protected corridor not exceeding 18 m in length. The corridor is deemed to be part of the fire-fighting shaft, and any access to it from the accommodation should be by way of protected lobbies.*"
- 2.7. Design changes to the internal layout of the residential accommodation may be required, however, this is unlikely to impact on land use planning considerations. It will be for the applicant to demonstrate compliance at later regulatory stages.

Cycle Storage and Car Parking

- 2.8. The plan drawings indicate cycle storage and car parking areas. No further information is provided regarding the location of the cycle charging points, but it is advisable to consider the risk to fire safety due to the presence of electric vehicles (EV) as they

contain lithium-ion batteries. The impact that EV vehicles can have on means of escape, particularly when charging is undertaken adjacent to the place of residence.

- 2.9. It is advisable to consider the risk to fire safety due to the presence of electric vehicles (EV) as they contain lithium-ion batteries. Lithium-ion batteries may suffer thermal runaway and cell rupture, releasing large quantities of toxic gases, heat, and smoke before catching fire, as well as post-ignition. When they burn, a large amount of water is required to flow on the batteries, however, fire keeps flaring up even after it appears to have been extinguished. Furthermore, there is a danger of electrical shock to firefighters whilst tackling a fire due to the high voltage used in EVs. Any subsequent design changes may affect land use planning considerations relating to vehicle parking provision in the development.

- 2.10. It will be for the applicant to demonstrate that the proposed fire safety design standard is suitable and that the proposed development complies with building regulations, at subsequent regulatory stages.

Green Roof

- 2.11. 4th and 6th floor plan drawings illustrate several green roof spaces. The external envelope of a building should not provide a medium for undue fire spread. A green roof may constitute a fire hazard as it requires a regular management and maintenance regime. Where green roofs are proposed the roof construction will need to provide sufficient fire resistance to prevent fire spread to any adjoining wall(s). This document [Fire Performance of Green Roofs and Walls \(publishing.service.gov.uk\)](#) will provide guidance on the fire performance aspects of green roof and wall construction and maintenance.

- 2.12. A habitat or green roof may constitute a fire hazard as it requires a regular management and maintenance regime.

- 2.13. It will be for the applicant to demonstrate that the proposed habitat roofs are viable in relation to fire safety. This will be subject to further consideration at a later regulatory stage.

- 2.14. This document [Fire Performance of Green Roofs and Walls \(publishing.service.gov.uk\)](#) will provide guidance on the fire performance aspects of green roof and wall construction and maintenance.

Yours sincerely

Gareth Underhill
Gareth Underhill
Fire Safety Information Assessor

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

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