

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	Kirklees Council
LPA planning ref no	2026/62/90857/W
Our ref	26-0570
Site address	Pearl House (Former HSBC Bank), 2 Cloth Hall Street, Huddersfield, HD1 2EG
Proposal description	Conversion and extension of sixth floor plant room to form communal space, office and plant room area including re-cladding and new window openings, external alterations including new access door openings and replacement windows (in association with previously-approved change of use of floors 1-5 inclusive to 28 flats/studios and change of use of part of ground floor to provide associated facilities for the flats/studios, including refuse store, approved pursuant to application 2025/91221) (within a Conservation Area)
Date on fire statement	No dated (published on planning register at 19.05.2026)
Date consultation received	22/05/2026
Date response sent	11/06/2026

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 full planning application relates to an existing 6-storey (plus basement) office building (former HSBC Bank) in the town centre of Huddersfield, having an upper-most storey height of 25m.
- 1.2 Planning Gateway One (PGO) has been consulted in relation to a separate, prior approval application at this address, received on 09/09/2025 (ref.2025/91221). A

substantive response (SR) was issued on 30/09/2025 ('Content'), under the reference 25-0707.

- 1.3 The prior approval application related to the change of use from Commercial, Business & Service (Use Class E) to residential dwellings (Use Class C3), creating 28 flats located on the 1st to 5th floor levels, with Ancillary/Storage spaces within the basement.
- 1.4 The current proposal includes the conversion and extension of sixth floor plant room to form communal space, office and plant room area, including re-cladding and new window openings. Residential refuse storage / commercial waste storage and a commercial unit are to be provided at the ground floor level. The basement storey accommodates a store for ground floor commercial unit and a cycle store for residents. Plant, including all mechanical ventilation and sprinkler water storage, is provided on the sixth floor.
- 1.5 The development will be served by two stairs: an evacuation stair (basement to level 6) and a firefighting stair (ground to level 6). Each stair will be provided with an associated lift. The firefighting stair is to be part of a firefighting shaft which will also contain a firefighting lift, a smoke ventilated lobby, and a dry riser outlet within the stair. A commercial/firefighting lift and an internal stair are proposed connecting the commercial area at the basement level with the commercial unit at the ground level.

Consultation

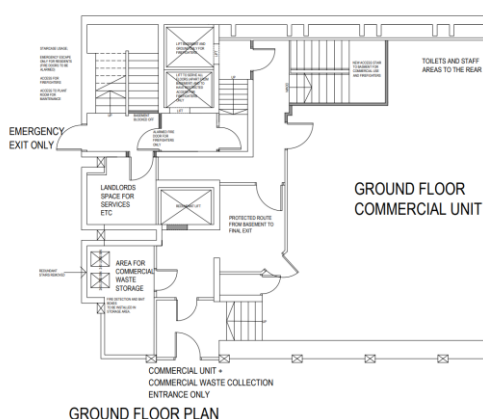
- 1.6 Section 6 (Building schedule) of the *Fire Statement* confirms that the design standard used is Approved Document B (ADB) Volume 1 ('Dwellings'). The BSR has assessed the application accordingly, considering the use of the 6th floor as of residential amenity use (resident social/workspace and landlords office), as distinct from non-residential use.
- 1.7 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 matters 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.

Means of escape (communication between two different occupancies)

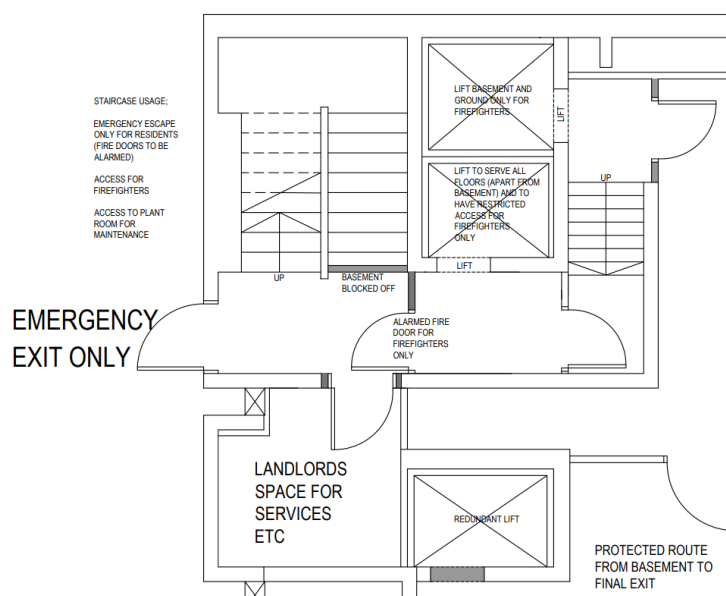
- 2.1 The proposed floor plans drawings (basement and ground floor) show that the 'Store for Ground Floor Commercial Unit' and the 'Ground Floor Commercial Unit,' communicate with the firefighting shaft which serves the residential area (flats on upper floors L1 to L5). Therefore, there is a connection between the residential and the commercial areas.



- 2.2 The adopted fire safety standard states that residential stairs in buildings of this height, should not serve other occupancies in. Accordingly, the residential areas should not communicate with the commercial areas.
- 2.3 Design changes to provide separation between these two different occupancies, in this instance, are unlikely to affect land use planning considerations, where they can be achieved by way of internal alterations. It will be for the applicant to demonstrate compliance at later regulatory stages.

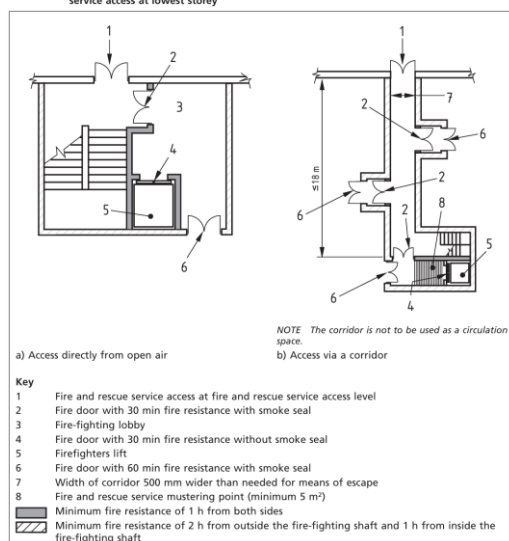
Firefighting shaft

- 2.4 The proposed Ground Floor Plan drawing shows a direct connection between the 'Landlords Space for Services etc.' and the firefighting shaft/firefighting stair enclosure.



- 2.5 The relevant fire safety standard recommends for the firefighting shaft/lobby, at the fire service access level, any access to it from the accommodation should be by way of protected lobbies (extract from BS9999:2017):

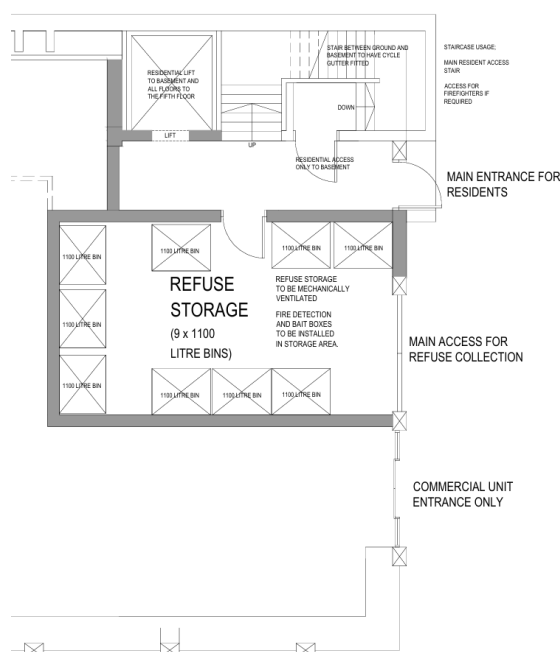
Figure 20 Typical fire-fighting shaft layout at fire and rescue service access level – Fire and rescue service access at lowest storey



- 2.6 Also, from the information provided within the planning application, it is unclear if the 'Landlords Space for Services etc.' room has a commercial or residential use. It will be for the applicant to demonstrate compliance at later regulatory stages and seek advice from the LPA about the materiality of any design changes proposed if this would necessitate a new external entrance to serve the room.

Means of escape (ancillary accommodation)

- 2.7 The proposed Ground Floor Plan drawing shows that the residential 'Refuse Storage' connects directly with the stair enclosure which is the means of escape route for residential upper storeys.



- 2.8 According to the cited fire safety standard, any access to the escape route at the fire service access level, from ancillary accommodation, should be by way of protected lobbies.

- 2.9 Design changes necessary to comply, in this instance, are unlikely to affect land use planning considerations, where they can be achieved by way of internal alterations. It will be for the applicant to demonstrate compliance at later regulatory stages.

Building Safety Regulator

- 2.10 For information, the BSR advises that all higher risk buildings are now required to be registered with the Building Safety Regulator ('BSR') on occupation. Further information can be found at [Applying to register a high-rise residential building - GOV.UK](#). The BSR will invite Accountable Persons to submit a safety case for their registered building(s).
- 2.11 It will be for the 'Accountable Person' (AP) or 'Principal Accountable Person' (PAP) to produce a safety case to demonstrate how the building's safety risks are managed. This would include the risks to the safety of people in or about a building arising from the spread of fire, including the spread of fire over external walls.

Yours sincerely

Sorin Bucur
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.