

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	Reading
LPA planning ref no	PL/24/0846
Our ref	pgo-5679
Site address	Napier Court, Napier Road, Reading, Berkshire RG1 8BW
Proposal description	Demolition of existing buildings and erection of new buildings of 11 and 12 storeys, with amenity space at roof level (part indoor and set back), to provide 576 build to rent residential dwellings (Class C3) with residential amenity space, parking, landscaping and associated engineering works.
Date on fire statement	12.06.2024
Date consultation received	07.08.2024
Date response sent	28.08.2024

1. Substantive response for the local planning authority

Thank you for consulting HSE about this application.

Headline response from HSE
Headline Response from HSE ('content')

Scope of consultation

1.1. The above planning application relates to a new development, which will consist of two residential buildings, each with two blocks. Building 1 consists of Blocks A & B, and Building 2 consists of Blocks C & D.

1.2. Section 6 (b) ('Building Schedule') of the Fire Statement confirms that Block A has an uppermost floor height of approximately 36m above ground level (with 12 storeys: Ground level, plus L1 to L11). Blocks B, C and D, each have an uppermost floor height of

approximately 32m above ground level (with 11 storeys: Ground level, plus L1 to L10). Level 11 of Block A consists entirely of internal and external amenity spaces. No basement level is proposed within the development.

1.3. Each block will be served by two firefighting stairs on all levels. The firefighting stairs form part of a firefighting shaft which also contains a firefighting lift, a smoke ventilated lobby and a dry main riser outlet within the stair. In addition, one of the two stair cores within each block, will be provided with an evacuation lift.

Consultation

1.4. Section 6 (d) ('Building Schedule') of the Fire Statement, confirms that the design standards used are: BS9991:2015 ('*Fire safety design, management, and use of residential buildings*') and Approved Document B, Volume 1 ('*Dwellings*') for the residential areas; BS 9999:2017, ('*Code of practice for fire safety in the design, management and use of buildings*') for the non-residential areas. HSE has assessed the application accordingly.

1.5. Following a review of the information provided in the planning application, HSE is content with the fire safety design as set out in the project description, to the extent it affects land use planning considerations. However, HSE 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 HSE's substantive response and should not be used for the purposes of decision making by the local planning authority.

Fire service access (dual-entry lift)

2.1. The 'Proposed Floor Plans' drawings, show for Block D that (only at the ground level) one of the two firefighting shafts, contains a dual-entry firefighting lift.

2.2. BS9991:2015, clause '50.3.2.2 Fire-fighting lifts' states: "*The use of **dual-entry fire-fighting lifts is not recommended** in residential buildings.*"

2.3. Accordingly, design changes by way of internal alterations, necessary to provide a suitable fire service access are unlikely to affect land use planning considerations. It will be for the applicant to demonstrate compliance at later regulatory stages.

Means of escape (access of external roof terrace)

2.4. The 'Proposed Level 11 Floor Plan' drawing for Block A, shows that the external 'Roof Terrace Amenity' area, is accessed directly from the 'Lounge' or 'Shared Workspace'.

2.5. Annex D, clause 'D.6 Communal roof gardens and other open spaces' of BS9991:2015, states: "*Access to communal roof gardens and similar places should be from a protected stairway enclosure or a protected ventilated lobby/corridor.*"

2.6. It is noted that in this instance, the issue may be resolved by internal alterations. However, if this is not possible, further design changes may affect land use planning considerations regarding the layout and appearance of the building. It will be for the applicant to demonstrate compliance at later regulatory stages.

Means of escape (open-plan flat layout)

2.7. Section 7. 'Specific Technical Complexities' (Open plan apartment layout) of the Fire Statement, states: "*The proposed layouts exceed 8m x 4m in area and consists of **open kitchen design**. Apartment layouts have been developed to maintain an escape width from inner rooms of 0.9m that does not pass within 1.8m of hob locations.*"

2.8. Also, the applicant states: "*If required, **an assessment** into the effectiveness of protection devices, e.g. power cut-off, in conjunction with sprinkler system in protecting means of escape **will be quantified** during detailed design to support assessment of compliance with Part B of Schedule 1 to the Building Regulations (hereafter referred to as Part B).*"

2.9. BS9991:2015, clause '9.7 Open-plan flat design,' states: "*The kitchen should be enclosed in open-plan flats having an area exceeding 8 m × 4 m. Cooking appliances in open-plan flats having an area smaller than 8m×4m should not be adjacent to the entrance of the flat.*"

2.10. It should be noted that if the proposed '**assessment** into the effectiveness of protection devices' does not support the design in the planning application, design changes by way of internal alterations are unlikely to affect land use planning considerations. It will be for the applicant to demonstrate compliance at later regulatory stages.

Computational fluid dynamics (CFD) – Smoke control

2.11. Section 7. 'Specific technical complexities' of the Fire Statement, identifies the proposed use of CFD analysis, stating: "*Where extended corridors are proposed, i.e. >15m travel (Block A), the MSVS design will provide clearance in accordance with Annex A of BS 9991. The system design will be developed using **computational fluid dynamics (CFD)** to demonstrate protection of cores to meet the recommendations of BS 9991.*"

2.12. It should be noted that if CFD analysis does not support the design in the planning application, design changes may affect land use planning considerations such as the layout and appearance of the development. It will be for the applicant to demonstrate compliance at later regulatory stages.

Photovoltaic (PV) panels

2.13. The 'Proposed Roof Plan' drawing confirms that the new proposal includes provision of photovoltaic panels. Where the roof top installation of PV panels is proposed, it should be noted that fire safety standards require suitable support of cabling to avoid obstruction of escape routes and firefighting access due to the failure of fixings and consideration should be given to ensure that all power supplies, electrical wiring, and control equipment is provided with appropriate levels of protection against fire.

Green roofs/walls

2.14. The 'Proposed Roof Plan' drawing confirms the proposed installation of "*Biodiverse Green Roofs*" at levels 1,7, and 9. Also, section '6.5 The Pocket Park' of the Design and Access Statement, shows on the 'Illustrative section', the presence of "*Green Wall to Central Courtyard Façade*". A green roof may constitute a fire hazard as it requires a regular management and maintenance regime, and the external envelope of a building should not provide a medium for undue fire spread. Where a green roof is proposed, sufficient fire resistance to prevent fire spread to any adjoining roofs/wall(s) will be required. It will be for

2.15. Guidance for green roofs can be found in [*Fire performance of green roofs and walls - GOV.UK \(www.gov.uk\)*](https://www.gov.uk/government/publications/fire-performance-of-green-roofs-and-walls), published by the Department for Communities and Local Government. Where regulation 7(2) applies, that regulation prevails over all the provisions in this paragraph.

Fire Safety Information Assessor

- 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

