

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	PL241155
Our ref	pgo-6082
Site address	JOHN LEWIS CUSTOMER COLLECTION POINT, CROSSLAND ROAD, READING, RG1 2HT
Proposal description	Demolition of the existing building and redevelopment of the site comprising erection of a new building for up to 215 build to rent residential dwellings (Use Class C3) together with flexible commercial / community space (Use Class E/F1/F2), residents' facilities, landscaping, public realm, amenity space, cycle parking and disabled car parking.
Date on fire statement	07/06/2024
Date consultation received	23/10/2024
Date response sent	13/11/2024

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 application relates to the redevelopment of the site comprising erection of a new building for up to 215 build to rent residential dwellings (Use Class C3) together with flexible commercial / community space.
- 1.2. The 'Planning Statement' (dated August 2024) summarises the development as:
 - 215 new homes (Use Class C3), including 14 accessible homes and a mix of studio, 1, 2 and 3-bed homes, with accompanying residents' facilities (including a lounge, flexible work from home and dining space and gym);

- 74sqm flexible commercial / community space (Use Class E/F1/F2);
 - 3 accessible car parking spaces;
 - 4 on-street 'essential use' car parking spaces for use by the residents of the affordable housing;
 - 1 off-site Car Club space;
 - 114 internal residents' cycle parking spaces and 3 external cycle stands;
 - external amenity space, comprising a residents' wellness garden and 359sqm neighbourhood garden.
- 1.3. A commercial unit will be provided at ground floor, this will not be accessed internally and will be separated from the rest of the development by 120 minutes fire resisting construction.
- 1.4. The development consists of:
- Block A: 7-storeys with a height of 20m
 - Block B: 10 storeys with a height of 29.1
 - Block C: 11-storeys with a height of 32.605m
- 1.5. Whilst the building splits into three blocks (as shown with the heights given above), it is noted that section 6 of the fire statement states that each block has access to the other blocks on every level that block extends to, and therefore, **it would be more accurate to describe the building as a single 32.605m tall residential building.**
- 1.6. The fire statement dated 07/06/2024 states that the adopted fire safety design standard is Approved Document B (ADB) vol 1. Also stated is that BS 9991 has been used to supplement the advice in ADB and for open plan apartments exceeding the dimensions described in BS 9991, a fire engineered approach will be developed. It is noted the fire statement was helpfully detailed and informative.

Current consultation

- 1.7. Section 6 of the fire statement states: *"The building extends in height the blocks drop off with the top storey of Block A at Level 6, the top storey of Block B at Level 9 and Block C at level 10. A firefighting shaft is provided in each block, an additional means of escape stair is provided in block C as this extends above the other blocks."*
- 1.8. Section 8 of the fire statement states: *"The building is provided with three firefighting shafts, with one in each block..."*
- 1.9. 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.

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

- 2.1. Section 10 of the fire statement states: *“Access route provisions for the Fire Brigade at the residential areas will be provided within 18m of every dry fire main inlet. It is noted that **the design for the landscaping is currently being developed and will be under review as the design progresses.** For Core B The landscaping currently provides on street public parking at the point where a distance of 18m is measured from the firefighting shaft to a location suitable for a Fire Service vehicle appliance parking position. It is therefore **being investigated whether the on-street parking provisions can be moved, to remove the risk of vehicles being parked in the area the Fire Service could park.** If this is not possible the internal corridor will be extended to ensure that access is provided within 18m distance.”*
- 2.2. HSE acknowledges that the design for the landscaping is currently being reviewed. Whilst the current ‘Fire Service appliance access’ plan shows reasonable access, HSE welcomes the applicant’s intention to investigate the removal of car parking provisions for Block B, or the extension of the internal corridor.
- 2.3. Accordingly, it will be for the applicant to demonstrate compliance at later regulatory stages.

Communal kitchen

- 2.4. Section 6 of the fire statement states: *“It is noted that communal kitchen facilities are proposed to be located at ground floor level, the intent is that people will be able to hire out the space as such it will be similar to a large residential kitchen rather than a full commercial kitchen. The kitchen area is proposed to be open to a communal dining space. The kitchen is located remote from the stairs and in an area proposed to be protected by a commercial sprinkler system designed in accordance with BS EN 12845. The communal areas are separated from the residential stairs via smoke vented protected lobbies.”*
- 2.5. This is noted and it will be for the applicant to demonstrate compliance at later regulatory stages.

Brown roof

- 2.6. Section 6 of the fire statement states: *“A brown roof (note that a brown roof is similar to a green roof but does not contain specific planting and instead relies on seeds deposited on the roof from birds and the wind) will be provided and as such will be designed in accordance with ‘The Fire Performance of Green Roofs and Walls’, published by the Department for Communities and Local Government.”*
- 2.7. This is noted and it will be for the applicant to demonstrate compliance at later regulatory stages.

Hydrants

- 2.8. The response to the question about the reliance on the use of existing hydrants and whether they are currently usable / operable (fire statement, section 11) is given as

“don’t know”. Whilst the response “don’t know” is a valid response on the form, it is not appropriate to this development, which relies on working fire hydrants to feed the proposed fire main. In circumstances such as this, best practice is to check the state of the existing hydrants with the water authority. Without knowing their operability, the proposal might be relying on a disused water main or faulty hydrant.

- 2.9. It will be for the applicant to demonstrate compliance at later regulatory stages. It should be considered that should additional hydrant installations be required, this may affect land use planning considerations such as the landscaping around the development.

Yours sincerely

Stephen Gallagher
Stephen Gallagher
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