

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/24/1496
Our ref	pgo-6469
Site address	47 QUEEN'S WHARF, 47 QUEENS ROAD, READING, RG1 4QE
Proposal description	Change of use from Class E (offices) to C3 (dwelling houses) to comprise 7 dwelling units. Prior Notification under Class MA, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015.
Date on fire statement	08/11/2024
Date consultation received	09/01/2025
Date response sent	21/01/2025

1. Substantive response for the local planning authority

Thank you for consulting HSE about this application.

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

Scope of consultation

- 1.1. The above Prior Approval application relates to the proposed conversion of office floorspace (Class E) to 7 residential units (Class C3).
- 1.2. Page 1 (of 2) of the fire statement states: *"The proposed residential development sits at the ground floor level of an existing residential building"*, and the residential 7-storey building has a height that marginally exceeds 18m.
- 1.3. Section 1 of the Design and Access Statement (DAS – dated November 2024) states: *"The Applicant is seeking to undertake changes to the application site, through conversion of unoccupied and redundant commercial floor space..."*

Previous consultation related to this development

- 1.4. HSE received a consultation request on 25/10/2022 for the aforementioned address (planning reference: 221384) and responded on 02/11/2022, under the HSE reference pgo-2191, with the headline: 'Some Concern'.
- 1.5. HSE issued a further substantive response (some concern), dated 09/11/2022, in relation to a consultation received under the HSE reference pgo-2274.

Planning history

- 1.6. Section 3 (DAS) states: *"A previous Permitted Development application... **was refused due to the absence of information relating to the fire integrity of the external wall build-up as follows:**
The proposed development **has failed to demonstrate** that the external wall systems **meet the required fire safety standard of class A2-s1, d0 or better...**"*

Previous consultation

- 1.7. HSE received the first consultation request on 17/12/2024 for the aforementioned planning reference and responded on 08/01/2025, under the HSE reference pgo-6398, with the headline: 'Further Information Required'.

Current consultation

- 1.8. HSE received a second consultation request on 09/01/2025 described as, *'attached commentary/responses from the applicant in relation to this application'*. The response to HSE's comments is referred from this point onwards as "the applicant's letter". For the avoidance of doubt, this substantive response is in relation to the applicant's letter.
- 1.9. In email correspondence, the applicant states: *"The system specified for Queens Wharf is the Struc-Sil M specification as per the attached BBA certificate. This incorporates the Struc-Sil finish onto Glass fibre reinforced basecoat over the Rockwool Dual Density Mineral Wool Insulation. **The reaction to fire classification for this system is A2-s1, d0.**"*
- 1.10. HSE acknowledges the applicant stating that the reaction to fire classification for the proposed system is A2-s1, d0.
- 1.11. Further email correspondence from the applicant states: *"We are happy to **consider a condition to the PD consent** that restricts occupation of the new dwellings **until the external upgrade works** covered by planning ref: [PL/23/1112](#), and HSE Gateway 2 application with the BSR ref: BCA01849Q2B6 are complete."*
- 1.12. It is noted that the proposed works for planning application PL/23/1112 is: *"Replace existing insulated render building external facing material and replacement of vertical metal cladding panels. Replacement of balcony decking and timber handrails."*
- 1.13. If the LPA is minded to grant planning permission for this development, HSE strongly recommends that a condition is applied stating that, that the proposed dwellings cannot

be occupied until the external wall system has been remediated to meet the required fire safety standard of class A2-s1, d0 or better. The reason for this condition is in the interests of fire safety, to protect the health, safety and wellbeing of existing and proposed occupiers of the building.

- 1.14. 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.
- 1.15. For the purposes of this application, HSE has exercised its discretion in this instance, and acknowledges the applicant's commitment to ensuring that the external wall system will be compliant, and that further assessment will be undertaken in advance of later regulatory stages. The imposition of the condition referred to above would provide additional assurance that the works would be undertaken and to the correct standard.

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.

Building Safety Regulator

- 2.1. For information, HSE advises that all higher risk buildings are now required to be registered with the Building Safety Regulator ('BSR'). Once the building has been registered, the BSR will invite accountable persons to submit a safety case for their building. [Applying to register a high-rise residential building - GOV.UK](#)
- 2.2. Accordingly, it will be for the applicant to demonstrate compliance at later regulatory stages including the 'Safety Case Review' (in-occupation).

Compartmentation - fire resistance

- 2.3. Section 6.2 of the ... states: *"The proposed conversion of the building will comprise the following works to the internal building fabric:*
- *60min separation between flats*
 - *60min separation between protected means of escape*
 - *60 min fire protection to underside of ceilings*
 - *Meets part B regs for fire strategy"*
- 2.4. The above is noted and it will be for the applicant to demonstrate compliance at later regulatory stages.

Means of escape - cycle store

- 2.5. Section 5.3. of the Design and Access Statement ... states: *"The proposed lower ground floor level includes 12 cycle storage place for the new units."*

- 2.6. It may be advisable to consider the risk to fire safety by the presence of the electric cycles (ECs) in the cycle stores because they contain lithium-ion batteries. Lithium-ion batteries may suffer thermal runaway and cell rupture, releasing large volume of toxic gases, heat and smoke before catching fire as well as afterwards. When they burn, a large amount of water is needed to flow on the batteries, however, fire keeps flaring up even after it appears to be extinguished. Furthermore, there is a danger of electrical shock for firefighters tackling a fire due to the high voltage used in EVs. Any consequent design changes may affect land use planning considerations such as layout, appearance, and car parking provision of the development

Hydrants

- 2.7. Regarding the 'Suitability of water supply for the scale of development proposed', page 2 (of2) of the fire statement states: *"Unknown if existing development relies on water hydrants"*.
- 2.8. HSE advises that 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