

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/25/0202
Our ref	pgo-6688
Site address	Abbey Gardens, 4-6 Abbey Street, Reading RG1 3BA
Proposal description	Change of use of part of ground, first, second, third, fourth and fifth floors from Class E (offices) to C3 (dwelling houses) to comprise 84x1 bed and 8x2 bed flats. 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	N/A
Date consultation received	20/02/2025
Date response sent	10/03/2025

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 an existing building, *Abbey Gardens*, a large office building in Reading. The development consists of three separate blocks (North, Central and South). The work proposed relates to the Central and North blocks only, which are internally connected at all levels.

1.2. The development has a top-most floor height of 20.35m to the front of the building and 20.85m to the rear. The North and Central blocks have 6 storeys above the ground level (Ground plus L1 to L5), plus a lower ground level. Car and cycle parking, storage, plant refuse

storage and a lobby are located at the lower ground floor level, with residential accommodation proposed on the ground to fifth floors. (South block comprises lower ground to seventh floor; it does not form part of this application.)

1.3. The development (North and Central blocks) is served on all storeys by three stairs: one firefighting stair (stair 1 in Central block), and two evacuation stairs (stair 2 in Central block, and stair 3 in North block). The firefighting stair is part of the firefighting shaft which also contains a firefighting lift, an evacuation lift, a smoke ventilated lobby, and a dry riser outlet within the stair. The evacuation stair 3 (North block) has associated two evacuation lifts. Each evacuation stair will be provided with a dry riser main.

1.4. HSE understands that the proposed development does not affect the existing fire strategy of the building in terms of fire service access. The applicant states: “ *No changes are proposed to the previously approved vehicle /fire brigade access (and facilities) to the site which is available to all elevations of the building for a fire tender pump appliance.*” (Fire Strategy – section titled *Fire Fighting Facilities*)

1.5. It will be for the applicant to demonstrate that suitable fire service access and facilities are provided at later regulatory stages.

Consultation

1.6. The *Fire Safety Strategy* document dated 10/02/2025, confirms that the design standard used is BS9991:2024 (*‘Fire safety design, management, and use of residential buildings’*). Section titled *Fire Safety Design Approach of Fire Strategy*, states: “*The design is required to comply with the functional requirements relating to fire safety in BS9991:2024. In order to achieve this, the fire strategy for this building has been developed using guidance given in BS9991:2024 for the residential areas and ancillary accommodation.*” HSE has assessed the application accordingly.

1.7. 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.

Communication between two different occupancies (residential and commercial)

2.1. The Proposed Ground Floor Plan drawing shows that stair 3 (North block) connects with the commercial part of the building/floor (the existing office use). Also, the evacuation lifts associated to stair 3, serve the ground and level 1, which remain in commercial/office use, and levels 2 to 4, which are in residential use. Therefore, two different occupancies (residential and commercial) connect/communicate, and share means of escape (stair3 / lifts associated).

2.2. BS9991:2024, clause 16.2 (Automatic fire detection and fire alarm systems for mixed-use residential buildings), states: “*Where any part of a mixed-use residential building is expected to have non-residential occupancy groups, the part(s) of the building containing*

those occupancy groups should be separated from the residential part(s) by fire-resisting construction and should have independent escape routes, with the exception of certain small buildings (see Clause 12)."

2.3. BS9991:2024, clause 12 (Stairs within mixed-use residential developments), states: *"b) In buildings having more than three storeys above ground level: 1) all stairs serving dwellings not ancillary to the main use of the building should not communicate with any other occupancy in that building."*

2.4. BS9991:2024, clause 4.4 (Mixed-use residential buildings incorporating non-residential use), states: *"The means of escape strategy for the residential parts of the building should not be based upon them being evacuated simultaneously with the non-residential parts, and the **escape routes should be independent.**"*

2.5. Therefore, the occupancy groups should be separated by fire-resisting construction **and have independent escape routes**. Also, stairs serving dwellings, which are not ancillary to the main use of the building, **should not communicate** with any other occupancy in that building.

2.6. Design changes necessary to remove the connection/communication between residential and commercial parts of the building, and to provide separated means of escape may affect land use planning considerations such as the design, layout, and appearance of the development if the issue cannot be resolved with only internal alterations. 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.

External wall system

2.7. The Fire Safety Strategy states: *"All walls will be assessed for compliance with external fire spread and appropriate cavity barriers will be provided if required. External walls are existing and are of concrete construction."* The fire safety regulations require a minimum fire performance classification termed 'Class A2-s1, d0 or A1 or better'. (Table 9, BS9991:2024)

2.8. HSE highlights the requirements of building regulations relating to material changes of use of a building. It is understood that the proposed development, being an increase in the number of dwellings, would be within the definition of a material change of use. It will be for the applicant to demonstrate compliance with such requirements, including requirements relating to external walls of relevant buildings, at subsequent regulatory stages.

Smoke Ventilation and Computational Fluid Dynamic (CFD) modelling analyse

2.9. It is noted that in *Introduction*, the *Fire Safety Strategy* document, states: *"It is proposed to provide natural ventilation however if required mechanical ventilation can be provided to the common corridors and this will be demonstrated by **CFD analysis** its efficacy which will be agreed with the BSR as part of this process."*

2.10. If the CFD analysis does not support the design in the planning application, this 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.

Hydrants

2.11. There is no information within planning application regarding the water supply for firefighting operations, for the scale of proposed development.

2.12. BS9991:2024, clause 47.2 (Location and access to external water supply), states: *“Hydrants should be located in positions that are near to building entry points (including entry points to firefighting shafts containing fire mains) and fire appliance parking positions, as follows: a) For buildings provided with dry fire mains, hydrants should be provided within 90 m of dry fire main inlets.*

The provision of water mains and hydrants should be in accordance with BS 9990.”

2.13. Without confirmation that there is a suitable water supply, the development might be relying on a disused water main or faulty hydrant. Resolving this issue may affect land use planning considerations such as the landscaping around the development, should additional hydrant installations be required. This will be subject to later regulatory consideration.

Building Safety Regulator

2.14. HSE 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](#). From April 2024 the BSR started the process of inviting accountable persons to submit a safety case for their registered buildings.

Yours sincerely

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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

