

19th March 2025

Planning Reference: PL/25/0202

Your Ref: pgo-6688

RE: CHANGE OF USE OF PART OF GROUND, FIRST, SECOND, THIRD, FOURTH AND FIFTH FLOORS FROM CLASS E (OFFICES) TO C3 (DWELLING HOUSES) 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 ABBEY GARDENS, 4-6 ABBEY STREET, READING RG1 3BA

To whom it may concern,

Further to the request for further information please note our responses:

RFI 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).

Response: We can confirm that there will be no communication between the residential part of the building and the other occupancies. The residential areas will have there own cores and lifts and these will not communicate with the other occupancies.

RFI 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 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)."

Response: We can confirm that the residential cores will be separated from the other occupancies with non combustibile fire resisting construction achieving the minimum fire resistance of 60/90minutes.

RFI 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."

Response: We can confirm that there will be no communication between the residential part of the building and the other occupancies. The residential areas will have there own cores and lifts and these will not communicate with the other occupancies.

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."

Response: We can confirm that the residential cores will be separated from the other occupancies with non combustibile fire resisting construction achieving the minimum fire resistance of 60/90minutes. Therefore the escape strategy for the residential section will be based on a Stay Put strategy and the existing fire strategy for the other accommodation will be

a simultaneous. As there will be no communication between occupancies and independent escape routes this is considered acceptable. Due to the robustness of the proposed new compartment separation the evacuation strategies will be fully separate.

RFI 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

Response: We can confirm that the residential cores will be separated from the other occupancies with non combustible fire resisting construction achieving the minimum fire resistance of 60/90minutes. Therefore the escape strategy for the residential section will be based on a Stay Put strategy and the existing fire strategy for the other accommodation will be a simultaneous. As there will be no communication between occupancies and independent escape routes this is considered acceptable. Due to the robustness of the proposed new compartment separation the evacuation strategies will be fully separate.

RFI 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.

Response: The proposed design will allow the removal of connections/communications between residential and commercial parts of the building, and to provide separated means of escape.

External wall system

RFI 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)

Response: We can confirm that the external wall will be upgraded to meet the minimum Fire Performance of Class A2-s1, d0 or A1 or better.

RFI 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.

Response: We can confirm that the external wall will be upgraded to meet the minimum Fire Performance of Class A2-s1, d0 or A1 or better and this will be demonstrated at the Gateway 2 stage.

RFI Smoke Ventilation and Computational Fluid Dynamic (CFD) modelling analyse

RFI2.9. 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.”

Response: Due to the height of the top floor above ground natural ventilation is considered to be an acceptable means of smoke ventilation however if required due to construction constraint so or by way of a requirement of the BSR we will provide mechanical ventilation which will in turn require a CFD analysis to demonstrate its efficacy.

RFI 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.

Response: Due to the height of the top floor above ground natural ventilation is considered to be an acceptable means of smoke ventilation however if required due to construction constraint so or by way of a requirement of the BSR we will provide mechanical ventilation which will in turn require a CFD analysis to demonstrate its efficacy.

Hydrants

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

Response: The water provisions and supply will be provided as part of the Gateway 2 process. Please note the residential units will all be provided with domestic sprinklers to BS 9251 2021 and this will be off a domestic feed with its own supply.

RFI 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.”

Response: We can confirm that the **provision** of water mains and hydrants should be in accordance with BS 9990. It is considered there is an existing Hydrant provision as part of the town mains and that hydrants will be provided within 90m of the building as the building will be provided with dry mains as part of this Fire Strategy in addition to the proposed new residential units being provided with domestic sprinklers in accordance with BS 9251 2021. We can confirm that the **provision** of water mains and hydrants should be in accordance with BS 9990.

RFI 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.

Response: We can confirm that if there is an issue with the water supply this will be subject to further 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.

Response: We can confirm that the building will be registered Building Safety Regulator ('BSR') on occupation.

We trust the above addresses any queries with respect to the proposed change of use.

Yours faithfully,

.....
Eoghain Ryan
BE MSc (Fire Safety) CEng MIEI