

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/25/0310
Our ref	pgo-6868
Site address	Former Toys R Us, Kenavon Drive, Reading, RG1 3DH
Proposal description	Conversion of the double height ground floor level space at the southern end of the mid-block to provide 4 residential units (Class C3) at newly created first floor level, various associated alterations and retention of the ground floor Class A3/A4 unit under permission 170509.
Date on fire statement	24/02/2025
Date consultation received	27/03/2025
Date response sent	17/04/2025

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 consultation relates to an application for conversion of the double height ground floor level space at the southern end of the mid-block to provide 4 residential units completed under permission 170509.
- 1.2. HSE was not consulted about the original planning application relating to the wider Huntley Wharf development, which received planning permission (application reference: 170509) on 10 October 2018. , because it predated the establishment of HSE (Planning Gateway One) as a statutory consultee in relation to fire safety matters, for relevant buildings.
- 1.3. The development has been implemented, with the eastern, middle and part of the western blocks now occupied. As part of the Original Permission, five commercial spaces were approved, each with their own bespoke permitted uses.

1.4. Block M consists of five cores (M1, M2, M3, M4 and M5)

Table 1 Height of the top occupied floor for Middle Block

Core	Top Occupied Floor Height (m)
M1	19.5
M2	33
M3	19.7
M4	23.7
M5	19.5

1.5. The buildings include residential units, commercial premises, cycle store, plant room and car park.

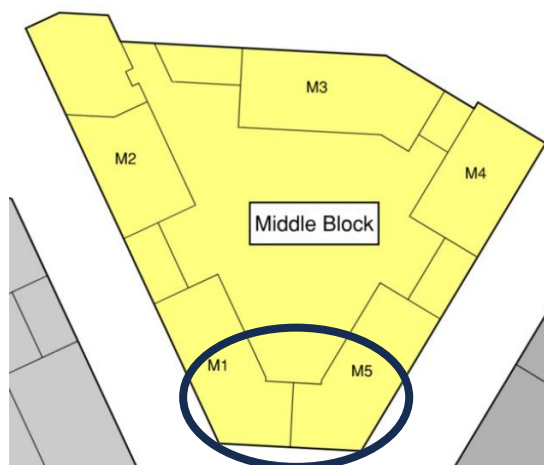
Current consultation

1.6. Section 6(e) of the fire statement confirms that the adopted fire safety design standard is BS9991 for residential and amenity spaces, and BS9999 for the commercial unit below. HSE notes the following statement with section 7 of the fire statement; *“Any deviation from standard guidance will be identified at design development stage, justified and discussed with the stakeholders for agreement.”* HSE has assessed this application on that basis.

1.7. HSE notes the following documentation included with the application, and for the avoidance of doubt, this substantive response is provided in relation to the information included in these documents:

- Planning statement
- Design and Access Statement prepared by PRP Architects;
- Existing and proposed plans, elevations and sections prepared by PRP Architects;
- Fire Statement prepared by KIWA.

1.8. The proposals seek to introduce a new mezzanine floor to accommodate four 2-bed residential apartments in the middle block Core M1 / M5 (as indicated below). These residential units are proposed at first floor level, filling the void area of unit 4 in Core M1 / M5 at ground floor level, which is currently vacant. No changes to the use at ground floor level are proposed as part of this application. At first floor level, the layout of the proposed residential apartments replicates that of the floor above at second floor level. This ensures that the structural columns are aligned. The fire escape strategy is also the same of that at second floor level.



- 1.9. The commercial unit on the ground floor will not connect to the residential parts of the building and no other changes are proposed to other parts of the building.
- 1.10. HSE welcomes these design modifications, and it will be for the applicant to demonstrate compliance at later regulatory stages.
- 1.11. Following a review of the information provided with this consultation, HSE is content with the fire safety design, to the extent that it affects land use planning. However, HSE has identified some 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 and Facilities

- 2.1. It is noted that the proposed works will not affect the current fire service access and facilities, as confirmed in sections 11, 12, 13 and 14 of the fire statement.
- 2.2. HSE has no further comment to make regarding the proposals at this stage, but it is recommended that the applicant liaise with the local Fire and Rescue Service to ensure that the proposals do not conflict with local Fire Service operating procedures and do not inhibit fire service access arrangements during the project.

Building Safety Regulator

- 2.3. 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 buildings. [Applying to register a high-rise residential building - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/applying-to-register-a-high-rise-residential-building)

Yours sincerely

Gareth Underhill

Gareth Underhill
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