

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/25/0697
Our ref	25-0242
Site address	Former Gas Holder site, Alexander Turner Close, Reading, RG1 3EA
Proposal description	Demolition of existing buildings and Gas Holder and the erection of new buildings ranging between 2 and 9 storeys in height, providing 130 residential units (Class C3) with associated access, car parking, landscaping and open space without complying with conditions 2 (approved plans), 11 (noise mitigation), 12 (air quality mitigation) and 35 (vehicle parking) of planning permission ref. PL/19/0627 for changes to design, layout, unit mix , vehicle parking, refuse storage, landscaping, noise mitigation and ventilation strategy and energy strategy.
Date on fire statement	N/A
Date consultation received	27/05/2025
Date response sent	10/06/2025

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 application relates to the demolition of existing buildings and gas holder and the erection of new buildings ranging between 2 and 9 storeys in height, providing 130 residential units.

- 1.2. It is understood that the development consists of:
 - Block A: 5-storeys
 - Block B: 9-storeys
 - Block C: 3-storeys
- 1.3. Planning permission for the above development, PL/19/0627, was granted 16/07/2021 subject to conditions. It is noted that application number PL/19/0627 was validated on 28/5/2019. This was before HSE became the statutory consultee for relevant buildings in relation to fire safety matters.
- 1.4. The 'Application for Removal or Variation of a Condition following Grant of Planning Permission' form submitted with this application states that the condition number associated with this application is: "*Condition 2*". Also stated is: "*Drawings need to be amended to show design and energy changes to enable the planning permission to be meet updated Building Regulations and the Building Safety Act, **plus updates to BS 9991** (Fire safety in the design, management and use of residential buildings. Code of Practice).*"
- 1.5. The 'Decision Notice for PL/19/0627 states that Condition 2 relates to: "*The development hereby permitted shall ONLY be carried out in accordance with the **following approved plans** and documents: ...*
REASON: For the avoidance of doubt and to ensure that the development is carried out and adhered to in accordance with the application form and associated details hereby approved."
- 1.6. The Planning Register associated with this application (PL/25/0697) contains a number of revised plans and drawings but no fire statement/strategy document.
- 1.7. As HSE was not consulted on the original application, the scope of this substantive response is limited to the revised plan drawings that show the provision of an additional stair within Block B.

Consultation

- 1.8. The revised floor plans (Rev. P2 – 10/04/2025) for Block B show the provision of an additional stair. HSE welcomes this additional stair.
- 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 – namely the provision of an additional stair serving all residential storeys within Block B - to the extent it affects land use planning considerations. However, HSE has identified some matters as supplementary information, set out below, 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.

Sprinkler system – Block A

- 2.1. Paragraph 7.6.4 of the original Design and Access Statement (dated April 2019) states that Block B will be provided with sprinklers: *“There will be a requirement to provide residential sprinklers to BS 9251”,* and *“will require a different overall strategy than block A.”*
- 2.2. The exact height of Block A has not been stated but paragraph 7.6.3 states: *“The overall height of the block is below 18m”*. Due to paragraph 6.4.2 stating that Block A is 5-storeys in height, HSE assumes that Block A is higher than 11m.
- 2.3. It should be noted that fire safety standards now state that all residential buildings with a floor higher than 11m above ground should be fitted with sprinklers in accordance with BS 9251:2021
- 2.4. In this instance HSE has exercised its discretion and have assumed that Block A will be provided with a sprinkler system. Accordingly, it will be for the applicant to demonstrate compliance at later regulatory stages. Additionally, if space for the sprinkler tank(s) required has not already been provided, the applicant should seek the advice of the LPA about the materiality of any design changes (to planning) that may be required to accommodate new or different water tank provision.

External wall system

- 2.5. Regarding the external wall system in Block B, paragraph 7.6.4 of Design and Access Statement of states: *“Note: Following the recent change to the regulations in December 2018, as the residential premises are >18m the external wall shall be constructed with products that are of European Classification A2-s1, d0 or Class A1, ...”*
- 2.6. This is noted. However, HSE also highlights recommendations of Approved Document B volume 1 relating to fire performance of external wall surfaces and materials and products for residential buildings over 11m (Table 10.1 and para 10.7).
- 2.7. Accordingly, it will be for the applicant to demonstrate compliance at later regulatory stages.

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