

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/24/1155
Our ref	25-0421
Site address	John Lewis Customer Collection Point, Crossland Road, Reading, RG1 2HT
Proposal description	Demolition of the existing building and redevelopment of the site comprising erection of a new building for up to 170 build to rent residential dwellings (Use Class C3) together with flexible community space (Use Class F1/F2), residents' facilities, landscaping, public realm, amenity space and cycle parking. (Amended description)
Date on fire statement	03/07/2025
Date consultation received	08/07/2025
Date response sent	29/07/2025

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 redevelopment of the site comprising erection of a new building for up to 215 build to rent residential dwellings (Use Class C3) together with flexible commercial / community space.
- 1.2. A commercial unit will be provided at ground floor, this will not be accessed internally and will be separated from the rest of the development by 120 minutes fire resisting construction.

- 1.3. The development consists of:
- Block A: 7 storeys with a height of 20m.
 - Block B: 8 storeys with a height of 22.9m.
 - Block C: 8 storeys with a height of 22.9m.
- 1.4. Whilst the building splits into three blocks (as shown with the heights given above), it is noted that section 6 of the fire statement states that each block has access to the other blocks on every level that block extends to.
- 1.5. No parts of the building have a basement level.
- 1.6. Section 8 of the fire statement states: *“The building is provided with three firefighting shafts, with one in each block...”*

Previous Consultation

- 1.7. HSE received a consultation request on 23/10/2024 for the planning application and responded on 13/11/2024, under the HSE reference pgo-6082, with the headline: ‘content’.

Current consultation

- 1.8. HSE received a further consultation request on 08/07/2025. The email from the LPA informed HSE that further/amended information has been forwarded.
- 1.9. The following additional information/addendum is included with this consultation.
- Updated application drawings.
 - Planning Statement – Addendum.
 - Design and Access Statement Addendum.
 - Updated Fire Statement: Gateway One.
- 1.10. The fire statement dated 07/06/2024 states that the adopted fire safety design standard is Approved Document B (ADB) vol 1 (BRE 187 for external fire spread). BS 9991 has been used to supplement the advice in ADB and for open plan apartments exceeding the dimensions described in BS 9991, a fire engineered approach will be developed. It will be for the applicant to demonstrate that appropriate design guides have been adopted at later regulatory stages.
- 1.11. Summary of key proposed changes (from submitted application to current revised scheme)
- Reduction from 215 to 170 units
 - Changes to proposed height and massing, including – reduction along Mill Lane frontage from max. GF+10 storeys to max. GF+7 storeys, stepping down to GF+5 storeys along Crossland Road to the south and east towards the Conservation Area.

- Updates to detailed elevation design, including - revisions relating to brickwork detailing, metal cladding, parapet line, introduction of Juliet balconies to part of Mill Lane frontage, and further articulation along frontage.
- Setting back building along Letcombe Street to introduce greening and setting back of 'middle finger' on Crossland Road to unify garden spaces.
- Introduction of 4 no. Ground floor apartments
- Updates to proposed unit mix.
- Internal changes to ground floor layout including relocation of flexible community space.
- Removal of bin chutes throughout.
- Removal of disabled car parking provision and on-street 'essential use' car parking spaces.
- Increased greening and improved pedestrian foot way arrangements to eastern side of Crossland Road.

1.12. HSE welcomes this additional information, and it will be for the applicant to demonstrate compliance at later regulatory stages.

1.13. Following a review of the information provided with this consultation, no additional information relating to the fire safety precautions for the proposed works has been provided, 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.

2.1. HSE advises that the previous substantive response (pgo-6082) is read in conjunction with this substantive response due to items previously referred to in the supplementary section are not included here.

External wall systems

2.2. HSE notes that section 6(g) of the fire statement states the external wall system will achieve class A2-s1, d0 or better.

2.3. The Design and Access statement addendum dated July 2025 states: *"Updates to detailed elevation design, including - revisions relating to brickwork detailing, metal cladding, parapet line, introduction of Juliet balconies to part of Mill Lane frontage, and further articulation along frontage".*

2.4. The fire safety standards state that all building work shall be carried out so that materials which become part of an external wall, or specified attachment, of a relevant building

are of European Classification A2-s1, d0 or A1. The applicant is advised that persons with competence in fire safety should undertake the proposed works.

- 2.5. It should be noted that Building Regulations now state *“Building work shall be carried out so that relevant metal composite material does not become part of an external wall, or specified attachment, of any building.”*
- 2.6. The applicant is advised that any alteration to the appearance of the building will affect land use planning considerations and may require HSE consultation.
- 2.7. It will be for the applicant to demonstrate that proposals satisfy regulatory requirements relating to external wall attachments on relevant buildings at later regulatory stages.

Photovoltaic Panels

- 2.8. The proposed roof plan drawings within the Design and Access statement addendum dated July 2025 include areas for the installation of photovoltaic panels.
- 2.9. Where the installation of photovoltaic panels (PV panels) is proposed it should be noted that fire safety standards require suitable support of cabling to avoid obstruction of escape routes and firefighting access due to the failure of fixings and consideration should be given to ensure that all power supplies, electrical wiring and control equipment is provided with appropriate levels of protection against fire. This will be subject to further consideration at a later regulatory stage.

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