

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/25/1711
Our ref	25-1074
Site address	Abbey Gardens, 4-6 Abbey Street, Reading RG1 3BA
Proposal description	Change of use of part of building from Class E (offices) to C3 (dwelling houses) to comprise 17 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	08/12/2025
Date response sent	29/12/2025

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, and includes the change of use of the double height attic roof plant areas (the lower and upper areas of: the 5th floor for North Block and the 6th floor for Central Block) for use as residential duplex apartments.

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 7 storeys above the ground level (Ground plus L1 to L6), 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 floors; it does not form part of this application).

1.3. The development (North and Central blocks) is served on all storeys by three stairs: two firefighting stairs (stair 1 in North block, and stair 2 in Central block), and one evacuation stair (stair 3 in Central block). The firefighting stairs are part of the firefighting shafts which also contain: a firefighting lift, an evacuation lift, a smoke ventilated lobby, and a dry riser outlet within the stair. The evacuation stair 3 (Central block) has an associated evacuation lift.

1.4. The attic space of the North block will form duplex apartments (with means of escape: Stair 1 and Stair 2) and will become the 5th floor of the North Block. The attic space of the Central block will form duplex apartments (with means of escape: Stair 3 and Stair 2) and will become the 6th floor of the Central Block.

Related consultation

1.5. HSE issued a substantive response with the headline response 'Content,' on 10/09/2025, under the reference 25-0610, following a consultation received on 20/08/2025. The previous Class MA application (ref.PL/25/1148) is noted as 'Withdrawn' (decision date: 16/09/2025).

Consultation

1.6. A further consultation was received from the LPA on 08/12/2025, providing a revised proposal (including 17 flats), revised proposed floor plans (for 5th floor - North Block; and the 6th floor - Central Block), and an updated *Fire Safety Strategy* dated 11/11/2025. For the avoidance of doubt, this substantive response relates to the information provided in the current Class MA consultation (ref.PL/25/1711).

1.7. It is noted that the current prior approval application seeks to increase the number of residential dwellings within the development from 14no. to 17no. as per the proposal description above.

1.8. The *Fire Safety Strategy* confirms that the design standard used is BS9991:2024 ('*Fire safety design, management, and use of residential buildings*'). HSE has assessed the application accordingly.

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, 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.

Fire Service access

2.1. HSE understands that the proposed development does not affect the existing fire strategy of the building in terms of fire service access. The fire strategy states: "*The building is existing; however the building is provided with suitable access for fire-fighting purposes; no changes are proposed to existing roadways which allow access for fire appliances, and entry points to buildings will be readily identifiable to the fire and rescue service. Fire*

appliance access to buildings will be discussed with the fire and rescue service at the concept stage.” It will be for the applicant to demonstrate that suitable fire service access and facilities are provided at later regulatory stages.

2.2. **Smoke Ventilation - Computational Fluid Dynamic (CFD)** It is noted that the *Fire Safety Strategy* document (Introduction) 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.*”

2.3. 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.

Material change of use

2.4. 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 at subsequent regulatory stages.

Building Safety Regulator

2.5. 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

S. Bucur

Sorin Bucur
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