

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/26/0012
Our ref	26-0021
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 Class C3 (dwelling houses) to comprise 12 new 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	Fire Safety Strategy – 09/12/2025
Date consultation received	08/01/2026
Date response sent	14/01/2026

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 change of use of part of the building from Class E (offices) to Class C3 (dwelling houses) to comprise 12 new flats.
- 1.2. The 'Fire Safety Strategy' document (Introduction) states: *"The building is in three blocks the North, Central and the South block, this strategy pertains to the North South and Central blocks. **The north and central blocks are fully separated at all levels from the South block** so the means of escape will be addressed separately for these blocks."*

- 1.3. The building forms three separate blocks North, Central and South. The North and Central Blocks are connected at all levels internally over the varying heights. The South block is separated from the North and Central blocks in the vertical plane by non-combustible construction.
- North Block comprises ground to fifth floor
 - Central Block comprises lower ground to sixth floor
 - **South Block** comprises lower ground to eighth floor
 - The premises has a basement and lower ground floor which contains car parking and ancillary plant and cycle storage, water tank and storage areas. The Basement is accessed by way of the central Stairs 2CN, **Stairs1S** and Stairs LB.
- 1.4. The Fire Safety Strategy states: *“**South Block:** The top floor for this application would be 36.7M above ground level to the front of the building.”*
- 1.5. The Fire Safety Strategy dated 09/12/2025 states that the adopted fire safety design standards are BS 9991 and BS 9999. HSE has assessed this application on that basis.

Planning history related to this address

- 1.6. HSE notes a number of prior approval applications (Change of use from Class E (offices) to C3 (dwelling houses)) regarding this building and the history of these can be located on the LPA planning register.

Consultation

- 1.7. Due to the number of separate prior approval applications regarding this building, it should be noted that HSE has assessed this prior approval application using the documents provided on the planning register for PL/26/0012. Due to the number of separate applications, this assessment does not include any of the documents relevant to other planning applications for a change of use on the lower floors or blocks.
- 1.8. HSE has assessed the building as residential and not connecting with office or commercial premises on any lower or upper floors, i.e. all stairs serving dwellings not ancillary to the main use of the building should not communicate with any other occupancy in that building. If this is not the case, then the LPA should reconsult with all other floor plans and relevant documents to show the relationship between proposed residential and other occupancies.
- 1.9. For the avoidance of doubt, HSE has only assessed this building from the ‘New Permitted Development Eighth Floor South Block -12 no duplex apartments (9 number 2 bed apartments and 3 no 3 bed apartments)’ aspects of this development.
- 1.10. Regarding the ‘New Permitted Development Eighth Floor South Block’, page 20 of the Fire Safety Strategy states the following:
- **“All residential units served by two means of escape.**
 - *All residential units will be provided with Domestic Sprinklers to BS 9991 2024*
 - *This floor and all apartments will be compartmented from all other accommodation with 90 minutes fire resistance*
 - *Adequate means of escape is provided from this level **with two number escape stairs which are solely for the residential accommodation***

- *An evacuation lift will be provided to the floor plate”.*

- 1.11. The Fire Safety Strategy states: ***“The upper floors of the South block will be served by two number escape stairs both of which will also provide the function of a fire fighting stair in a fire fighting shaft.”*** Additionally, page 27 of the same document confirm this arrangement and states: ***“The south block is provided with two firefighting shafts. This is Stairs 1S and Stairs 2S and identified on the drawings.”***
- 1.12. 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 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.

Fire service access and facilities

- 2.1. The Fire Safety Strategy (Foreword) states: ***“South block:***
The blocks comprise 8 floors over basement with the height of the top floor/roof space over 30m above ground. The existing basement is provided with commercial sprinklers. Please note Stairs 1S and 2S will be firefighting shafts due to the floor area.”
- 2.2. HSE welcomes the provision of two firefighting shafts within the South Block. Accordingly, it will be for the applicant to demonstrate compliance at later regulatory stages.

Mixed use building

- 2.3. Page 10 of the Fire Safety Strategy states: ***“The proposal is to separate the residential accommodation at lower ground, ground and first floors from the existing Ministry of Justice accommodation and provide dedicated access from lower ground floor to the residential accommodation from ground and sixth floor levels over. The Ministry of Justice accommodation and the Southern block will be fully separated from the residential accommodation at all levels.”***
- 2.4. HSE acknowledges the applicant’s comments, and it will be for the applicant to demonstrate compliance at later regulatory stages.

Smoke ventilation system - CFD

- 2.5. Page 15 of the Fire Safety Strategy states: ***“Ventilation will be required for both firefighting shafts and the common corridors to the proposed residential units. It is proposed to provide natural ventilation or mechanical ventilation to the common corridors. If mechanical ventilation this will be demonstrated by CFD analysis its efficacy which will be agreed with the BSR as part of this process”.***

- 2.6. Additionally, page 51 of the same document states: *“The North and Central blocks are less than 30 m above ground level natural ventilation or mechanical smoke ventilation system (MSVS) and/or pressure differential system is proposed. **The South Block which is over 30m will be provided with mechanical ventilation with associated CFD analysis.**”*
- 2.7. This is noted and it will be for the applicant to demonstrate compliance at later regulatory stages. However, if the CFD modelling does not support the design, any subsequent redesign may affect land use planning considerations.

Sprinkler system

- 2.8. Regarding fire suppression within the South Block, the Fire Safety Strategy states: *“The height of the top storey of the block is more than 11m so therefore Fire Safety Strategy domestic sprinklers will be provided to residential units in accordance with BS 9251 2021 and as it is above 18m **these will be designed as a Category 4 system** for a 60 minute duration with a minimum design density of 2.80mm/min with 2 to 4 sprinklers.”*
- 2.9. HSE acknowledges the applicant’s comments. 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