

Station Hill Phase 3A

Plot A/B & Plot D
Outline Fire Strategy
Revision 4
March 2026



Station Hill Phase 3A

Outline Fire Strategy





Report

Project	Reading Station Hill Phase 3A
Report Title	Outline Fire Strategy
Our Ref	KL10133/R1 Issue 4

Draft Report

Project Reading Station Hill Phase 3A

Report Title Outline Fire Strategy

Report No. KL10133/R1
Issue No. Issue 4
Issue Date. 06/03/2026

	Issue 1	Issue 2	Issue 3	Issue 4	Issue 5	Issue 6
Date	20/08/2025	04/12/2025	13/02/2026	06/03/2026		
By	EG	EG	EG	EG		
Checked	PM	PM	PM	NH		
Approved	NH	PM	PM	NH		

Contents

- 1.0 INTRODUCTION
- 2.0 BUILDING SAFETY ACT 2022 (BSA)
- 3.0 ACTIVE FIRE SAFETY SYSTEMS
- 4.0 EVACUATION STRATEGY
- 5.0 APARTMENT LAYOUTS
- 6.0 RESIDENTIAL MEANS OF ESCAPE
- 7.0 COMMERCIAL MEANS OF ESCAPE
- 8.0 STRUCTURE AND COMPARTMENTATION
- 9.0 FIRE FIGHTING FACILITIES
- 10.0 EXTERNAL FIRE SPREAD
- 11.0 INTERFACE WITH FUTURE OFFICE BUILDING
- 12.0 FIRE SAFETY MANAGEMENT
- 13.0 INFORMATION, LIMITATIONS AND ASSUMPTIONS

1.0 INTRODUCTION

1.1 Description of Project

This document is submitted on behalf of SH Reading Master LLP (hereafter referred to as the Applicant) in support of a Reserved Matters application pursuant to Outline Planning Permission ref. 192032, relating to Station Hill, Phase 3A (Plots A, B and D), Reading. The application seeks approval of the reserved matters for the development of Plots A, B and D, comprising the erection of two buildings to deliver residential units (Use Class C3), including affordable housing, ground floor flexible commercial accommodation (Use Class E), residential amenity spaces, associated landscaping and public realm works, including Station Hill Gardens and enhancements to Station Hill Square, together with new pedestrian routes, cycle parking, servicing, refuse storage, plant and ancillary infrastructure, and all other associated works, in accordance with the approved Station Hill Masterplan.

The proposed development comprises two residential buildings across Plots A, B and D, delivering 600 build-to-rent homes, including 75 affordable homes, alongside new flexible ground-floor retail and café uses, resident amenities and extensive landscaped public realm. The scheme will provide new north-south pedestrian routes linking Garrard Street, Greyfriars Road, Friars Walk and Reading Station, together with a new central garden, play space and enhancements to Station Hill Square, completing this phase of the Station Hill Masterplan.

The site occupies a highly accessible location immediately south of Reading Station, within Central Reading, and forms part of the wider Station Hill regeneration area. Over the past four years, Phases 1 and 2 have been successfully delivered, providing new homes, a landmark office building, public spaces and improved pedestrian connections that have transformed the area around the station. Phase 3A represents the next stage of this comprehensive development, building on this success to complete key movement routes, public realm spaces and development plots within the approved masterplan framework.

Phase 3A is brought forward pursuant to the 2021 Outline Planning Permission, which establishes the parameters for detailed development across the site. That consent allows for up to 750 homes within Phase 3 (Plots A, B and D). The current proposals deliver 600 homes, representing a deliberate reduction from the maximum permitted in order to prioritise apartment quality, generous resident amenity, landscaped terraces and high-quality public realm. Together, the development will bring around 1,000 new residents into the heart of Reading, supporting the vitality of the town centre and reinforcing Station Hill as a thriving, mixed-use neighbourhood.

The new homes will be professionally managed as part of a build-to-rent model, consistent with earlier phases at Station Hill, and will be supported by a comprehensive range of shared amenities, active frontages and car-free living (with the exception of servicing and accessible parking). In combination with the delivery of Station Hill Gardens, improvements to surrounding streets and the completion of Station Hill Square, Phase 3A will play a critical role in realising the final vision for Station Hill as a well-connected, inclusive and high-quality place to live, work and spend time.

1.2 Building Design Parameters

This project consists of two residential buildings (Plot AB and Plot D) which are connected by a common podium courtyard. The below podium levels (P1 and P2) comprise residential amenity, car parking and plant.

The design for Plot AB consists of apartments at Level 00 (podium) to Level 23 with Level 24 comprising amenity. The top floor is 82.04 m above ground level on Station Hill.

Plot D comprises of apartments from Level 1 to 19. There is amenity space at Level 20 and also at Level 00 (Podium). The top floor is approximately 70.44 m above ground level on Garrard Street.

A site plan of the building is shown in the figure below.

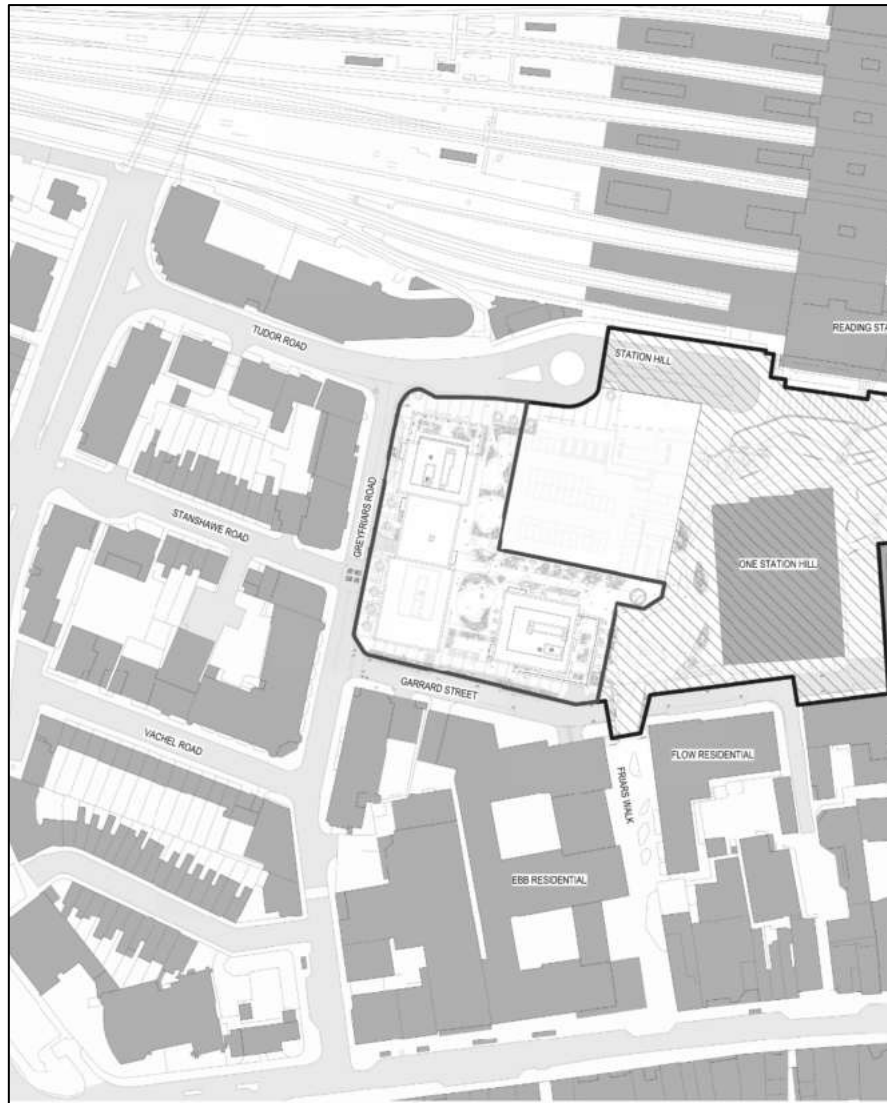


Figure 1 – Site Plan

The site also includes an area for a future office building (Building C) but this is not within the scope of this project and does not form part of this planning application. The design of the residential buildings considers the future interface to ensure that the choices made do not impact on the future viability of the office building. In order to not have the future office building be drawn into the Higher Risk Building classification, the residential buildings will be separated from the office site by party walls at below podium level such that the buildings are considered as separate buildings.

Plot AB and plot D are also separated from one another by party walls such that they can be considered as separate buildings. Each building is served by its own plant (including plant for life safety systems) which will provide flexibility should the buildings be sold separately in the future.

1.3 Building Regulations Guidance

The building has both commercial and residential areas. The following guidance has informed the fire strategy design development to date.

1. For the residential areas - *BS 9991:2024 Fire safety design, management and use of residential building - Code of practice*
2. For the commercial units - *BS 9999 2017, Fire safety in the design, management, and use of buildings. Code of practice (for the commercial spaces)*

3. Approved Document B (fire safety) volume 1: Dwellings, 2019 edition incorporating 2020, 2022 and 2025 amendments collated with 2026 and 2029 amendments
4. Approved Document B (fire safety) Volume 2: Buildings other than dwellings, 2019 edition incorporating 2020, 2022 and 2025 amendments collated with 2026 and 2029 amendments.

This Outline Fire Strategy aligns with the 2025 amendments of Approved document B volume 1 and 2 as well as being future-proofed against 2026 and 2029 amendments

1.4 Aim of Report

The aim of this report is to support a Reserved Matters Application (RMA) pursuant to Outline Planning Permission ref. 192032, relating to Station Hill, Phase 3A (Plots A/B and D) at Station Hill, Reading, RG1 1DX ('the Site') and to demonstrate that the relevant fire safety aspects of the design to date, and the approach / methodology that Jensen Hughes as the fire consultants are adopting with regards to Schedule 1, Part B (Fire Safety) of the Building Regulations (2010) are appropriate.

This document does not constitute the detailed fire strategy developed under the Building Regulations, which is being developed separately within the design process. However, this Outline Fire Strategy and accompanying Planning Gateway One Fire Statement Form evidences the provisions made for the safety of occupants as well as the provision of suitable access and provisions for firefighting considering fire safety policy requirements and the rationale for these measures. The exhaustiveness and definiteness of the statement is commensurate with the nature of the planning application submitted.

2.0 BUILDING SAFETY ACT 2022 (BSA)

The Building Safety Act was granted Royal Assent on 28 May 2022. This sets out a new regulatory framework which will cover the planning, design, construction and occupation of buildings. Compliance will be monitored by the new Building Safety Regulator (BSR), who is the new Building Control Authority for higher risk residential buildings (HRBs). HRBs are buildings comprising 7 or more storeys or a storey height of more than 18m above ground level and containing residential accommodation.

Both buildings comprising Reading Station Hill Phase 3A are classified as Higher Risk Buildings and will be subject to the new regulatory regime.

The design and construction of higher risk buildings need to pass through three specific gateways. These are:

- Gateway one – at the planning application stage
- Gateway two – before building work starts
- Gateway three – when building work is completed and in advance of occupation

3.0 ACTIVE FIRE SAFETY SYSTEMS

3.1 Sprinklers

Both buildings need sprinklers throughout.

In the residential areas the sprinkler system will be designed in accordance with BS 9251:2021.

The commercial units will be provided with a commercial sprinkler system conforming to BS EN 12845: 2015-A1:2019.

Some of the communal residential facilities (amenity and ancillary spaces) may need to be served from the commercial standard sprinkler system where they are out of scope of BS9251. This will be developed in subsequent design stages in conjunction with a specialist sprinkler designer.

3.2 Fire Detection and Alarm

A summary of the appropriate fire detection and alarm system category and guidance are given in Table 1 for the relevant areas.

AREA	CATEGORY	APPLICABLE GUIDANCE
Residential Accommodation	LD1	BS 5839-6:2019+A1
Residential Common Corridors	L5	BS 5839-1:2017
Ancillary and Communal Residential Areas	L3	BS 5839-1:2017
Commercial Areas	L3	BS 5839-1:2013

Table 1 – Appropriate fire detection and alarm systems for various areas

3.3 Evacuation Alert System

An Evacuation Alert System (EAS) will be provided to the building. The system will be designed and installed in line with BS 8629 and is for use by the fire and rescue service. This is in line with BS 9991:2024 section 48.3.

3.4 Smoke Control Systems

3.4.1 Residential Communal Areas

At the head of each stair there will be an automatic opening vent (AOV) achieving a minimum aerodynamic free area (Aa) of 0.7 m².

The evacuation lift lobbies should be smoke vented. Corridors adjacent to the evacuation lift lobby should also be smoke vented to prevent smoke ingress into the lift lobby. Smoke control provisions for a typical floor are shown diagrammatically in figure 2 below. Further details on the options and performance of these systems is given in Section 6.1.

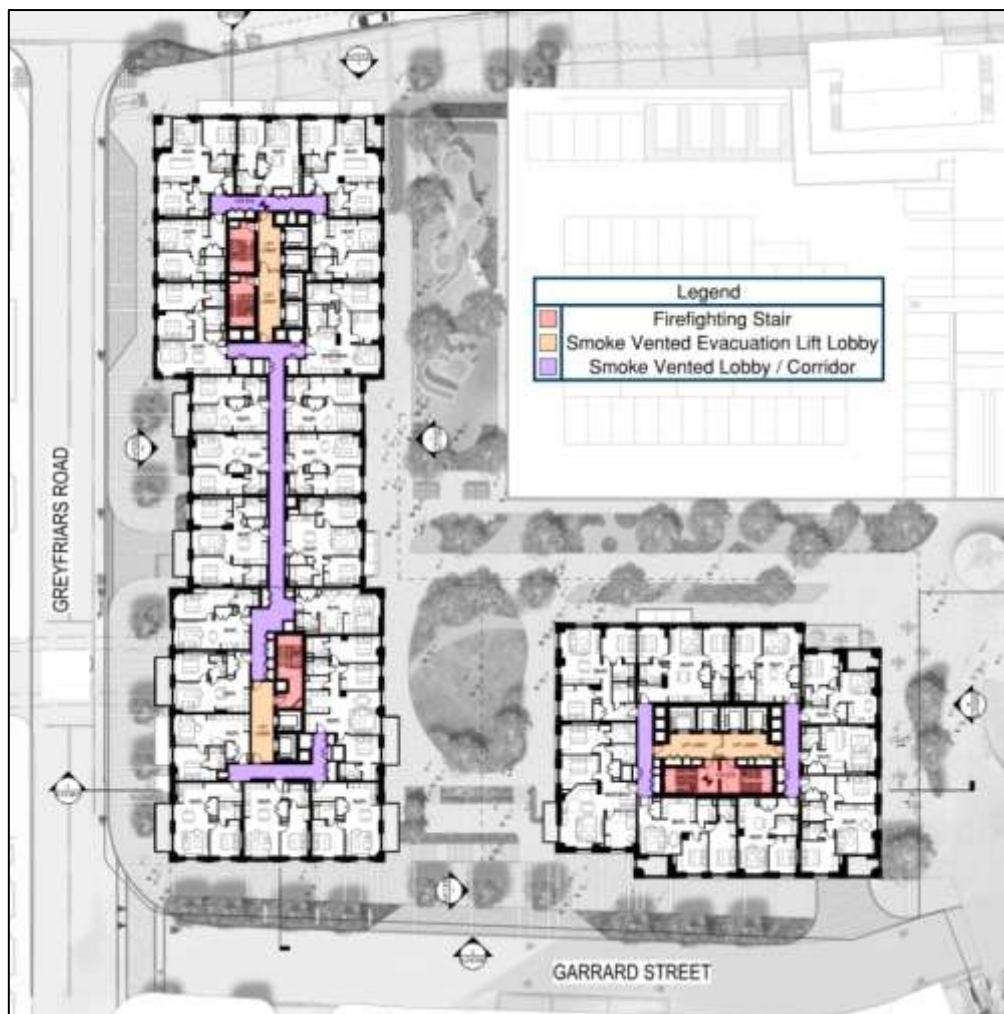


Figure 2 – Typical floor smoke venting

As each of the buildings is more than 30m high mechanical smoke shafts will be used.

There are some corridors which have longer travel distances than specified in the standard. Enhanced push/pull systems smoke extract systems will be used to justify these extended travel distances. Such systems consist of two smoke shafts, one which extracts smoke and one which provides fresh air designed to flush smoke from the corridor. This can be used to justify single direction travel distances up to 25 m. This is discussed further in Section 6.1.

The final exit corridor routes from the stairs to outside will be separated from ancillary areas via smoke vented lobbies which are designed to protect the final exit route from the ingress of smoke.

3.4.2 Other Areas

The car parking areas will need smoke control. Given that these areas have limited external walls it will most likely be a mechanical smoke extract system designed to achieve 10 air changes per hour.

Smoke venting is needed in other specific areas e.g. bin stores and access lobbies to any refuse chutes. Typically, the lobby providing access to bin stores or refuse chute rooms will be provided with 0.2 m² permanent ventilation. This can often be via a fire rated duct which extends to the elevation. This will be reviewed further as the design develops in more detail.

3.5 Emergency Lighting and Signage

Emergency lighting should be provided in accordance with the recommendations of BS 5266-1.

Exit signage in accordance with BS 5499-4:2013 and BS ISO 3864-1:2011 should be provided.

3.6 Wet Riser Fire Mains

Both buildings will be provided with wet riser fire mains due to their height.

3.7 Back-up/Secondary Power

All life safety systems will be provided with a back-up power supply.

The back-up / secondary power supply will be provided in accordance with the recommendations of Section 21 of BS 9991:2024. The secondary power will cover all life safety systems, including:

- Sprinkler pumps and wet riser pumps
- The dual-purpose firefighting and evacuation lifts
- The firefighting shafts
- Any intercommunications installations for firefighting;
- Any powered smoke control systems, including AOVs
- Fire alarm systems
- Emergency lights and signs, and
- Evacuation alert system (EAS)
- Any other life safety systems

4.0 EVACUATION STRATEGY

4.1 Residential Apartments

The residential apartments will follow a stay put evacuation strategy, where only the apartment on fire evacuates.

An evacuation alert system (EAS) designed to BS 8629 will be provided to the building, which will allow for the progressive evacuation (up to a full building evacuation) at the discretion of the fire service if required.

4.2 Residential Amenity and Ancillary Areas

Residential ancillary and amenity areas will adopt a simultaneous evacuation strategy upon activation of the fire alarm anywhere within the communal areas of the residential building. Detection in any of these areas will not result in the evacuation of the residential apartments as they adopt a stay put strategy.

4.3 Non-Residential Commercial Areas

The commercial spaces at Levels P1, P2, and podium level in both buildings will be independent of the rest of the building, will have their own separate escape routes, and will follow their own evacuation strategy.

The units will evacuate immediately upon alarm in the unit; a fire alarm activation will not cause the evacuation of the rest of the building. However, there will be a link from the non-residential areas to the residential building management to inform them of a fire alarm activation in the commercial areas and vice versa.

4.4 Occupants of Restricted Mobility

Evacuation lifts will be provided in the residential areas to enable step free means of escape such that all residents can complete a dignified escape regardless of their age or mobility. Further information on design is given in Section 6.5.

All lifts serving the residential building are designed as dual purpose fire fighting/evacuation lifts. This ensures maximum operational flexibility and redundancy for both evacuation and fire fighters.

Occupants of reduced mobility can either use the evacuation lift(s) to make their escape, or they can temporarily wait in the protected lobby. The emergency voice communication (EVC) systems will allow residents to communicate with onsite staff or firefighters, who could assist if necessary. Refuges will be located within the protected evacuation lift lobby. These will give residents direct access to the evacuation lifts. The lobbies and corridors are provided with smoke control systems designed to ensure that the evacuation lift lobbies remain relatively free of smoke during the escape period.

Management plans specifically addressing the needs of all building users but in particular those who need assistance will be developed by the building management team in due course.

5.0 APARTMENT LAYOUTS

There are various different apartment layouts and configurations that can be adopted. The following sections describe the criteria for open plan, cellular and typical studios. The design will be developed further in subsequent design stages.

5.1 Open Plan Flats

Open plan arrangements permit the bedrooms to be accessed from the lounge/communal areas. The following provisions apply.

- Sprinklers and an LD1 automatic fire detection and alarm system.
- The size of the open-plan flat will not exceed 16m×12m.
- Should be situated on a single level only

Cooking facilities will be located as remote as practicable from the entrance of apartments and will meet the parameters set out in Figure 3 below.

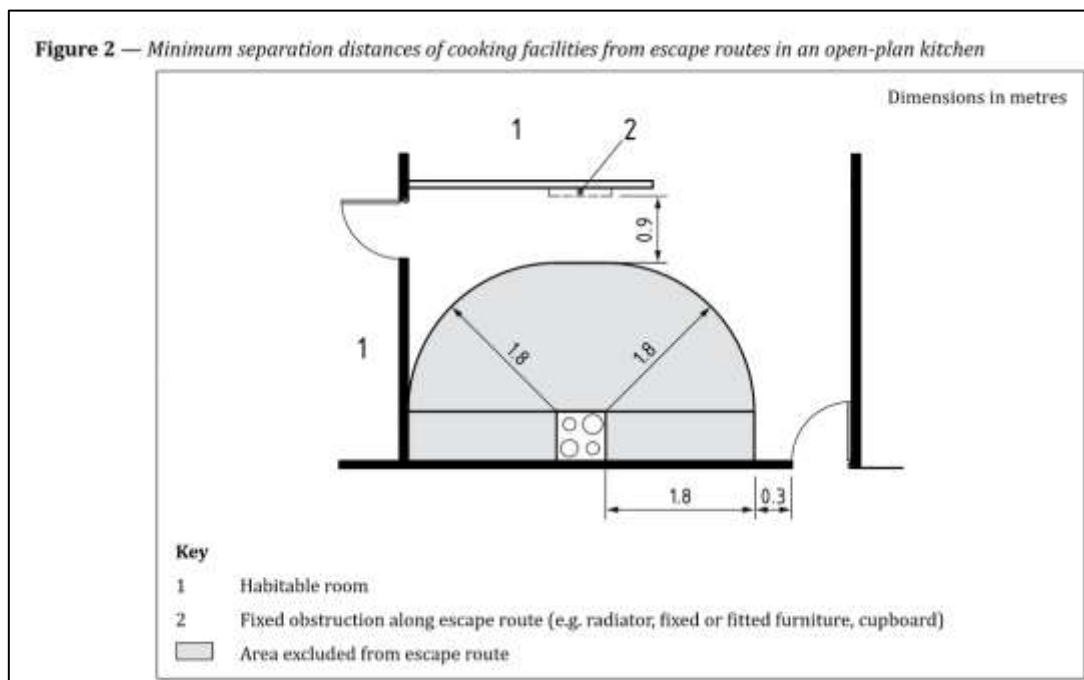


Figure 3 – Open Plan Kitchen Recommendations (Figure 2 from BS9991)

An example of an open plan flat which meets this guidance can be seen in the figure below. The flat layouts will be reviewed in detail during the next design stage to ensure that all layouts comply with these parameters.

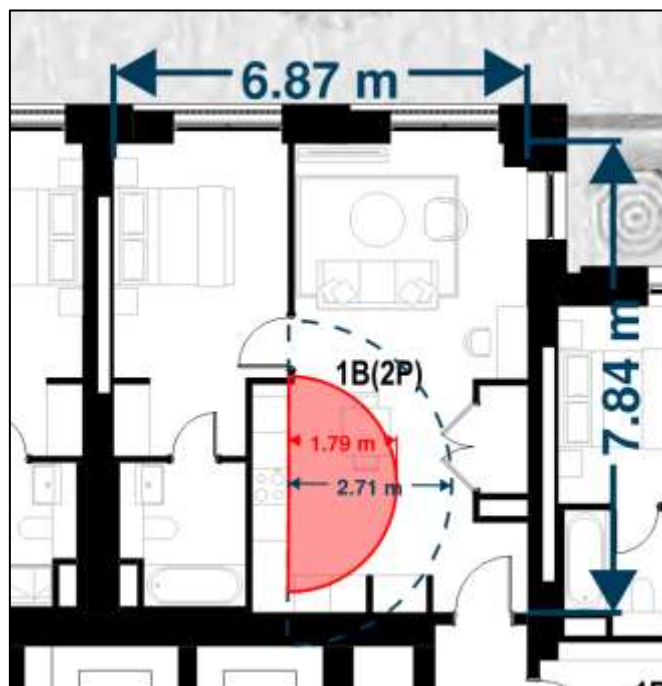


Figure 4 – Example of compliant open flat layout

5.2 Cellular flats

Cellular apartments with the rooms accessed from a hallway or corridor will be designed to the following parameters:

- Travel distance from the doors to habitable rooms will not exceed 9m from the flat entrance door or the hallway itself will be constructed as a protected hallway.
- The protected entrance hallways (where required) will be enclosed in 30 minutes fire resistant construction with all rooms accessed via FD 30 doors.
- Where utility cupboards are located within a protected entrance hall, they should be separated from the protected hall with 30 minutes fire resisting construction as well as a FD30S fire door.

These parameters are shown in the figure below.

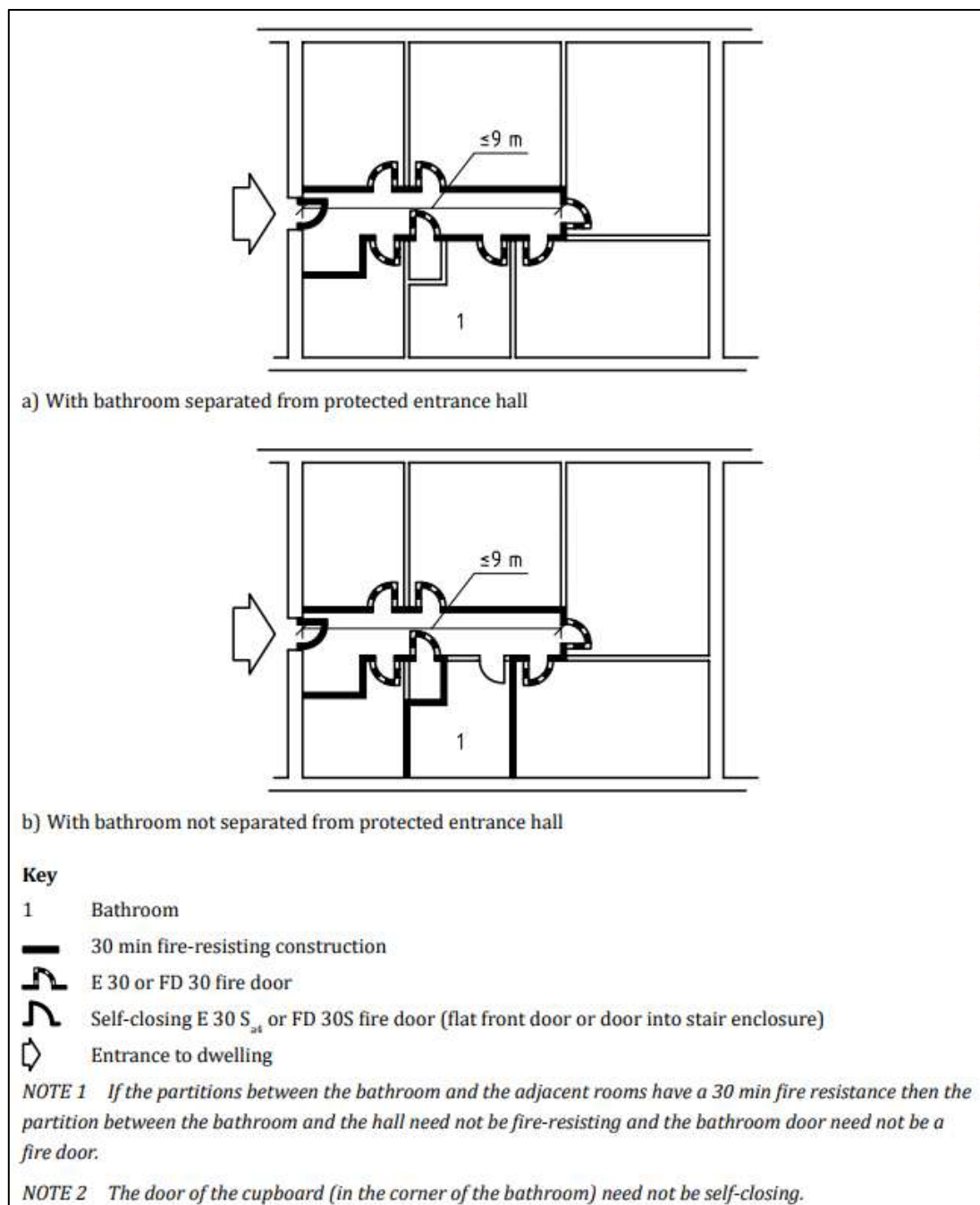


Figure 5 – Cellular Flats with Hallway

5.3 Studio Flats

Studio flats should be designed in accordance with Figure 5 (extracted from BS9991) with the cooking facilities located remote from the entrance door.

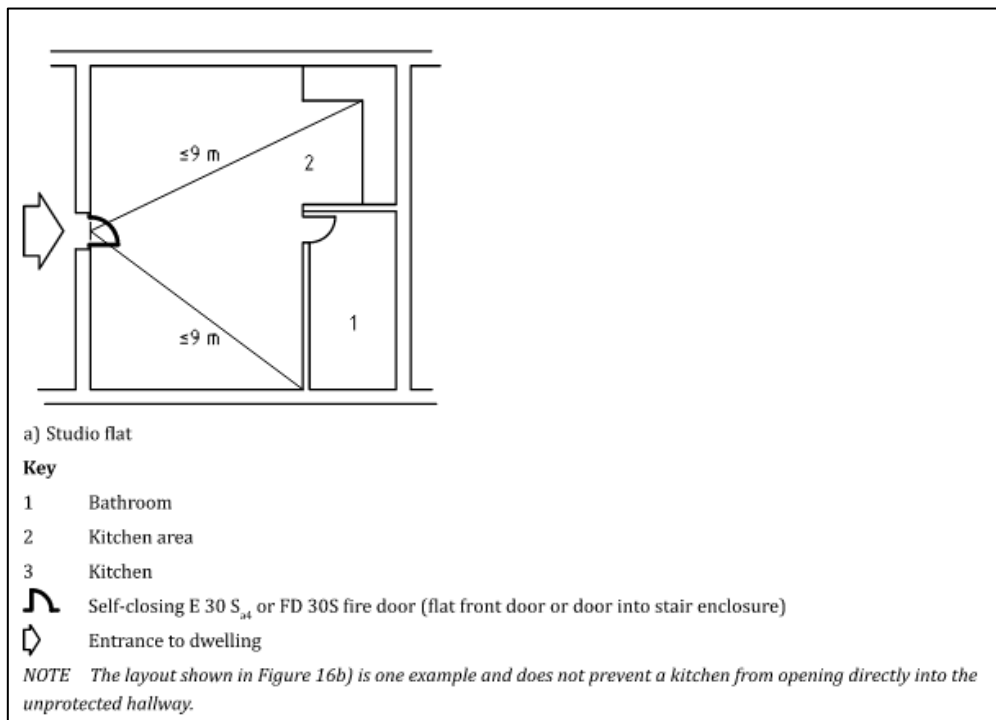


Figure 6 – Studio Flats

6.0 RESIDENTIAL MEANS OF ESCAPE

6.1 Common Corridors

As the building is sprinklered throughout, common corridor travel distances should be within 15m where escape is in a single direction and 45m when there is a choice of routes. This is met for the majority of residential areas. Where this is not met an enhanced push/pull smoke control system will be provided as explored later in this section. Typical floor corridor travel distances are shown below.

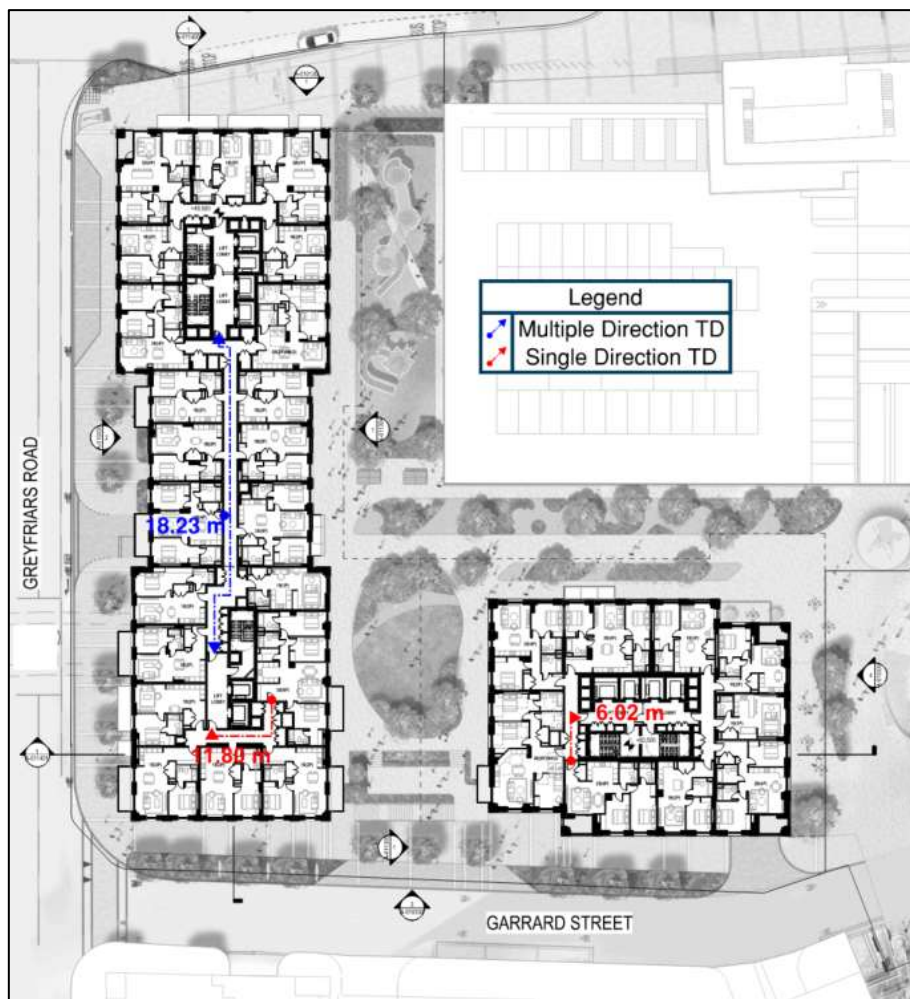


Figure 7 – Typical floor travel distances

Smoke venting should be provided in the evacuation lift lobbies as well as the adjacent corridors to protect the lobbies from smoke ingress.

The design philosophy is that airflow will be from the lobby into the corridor which should then protect the lobby from smoke ingress. The smoke shaft within the evacuation lift lobby will be configured to provide inlet air with the smoke shaft in the common corridor providing smoke exhaust as seen in the figure below. The doors enclosing the lift lobby will need to be hung to open into the corridor to better aid the flow of air from lobby to corridor.

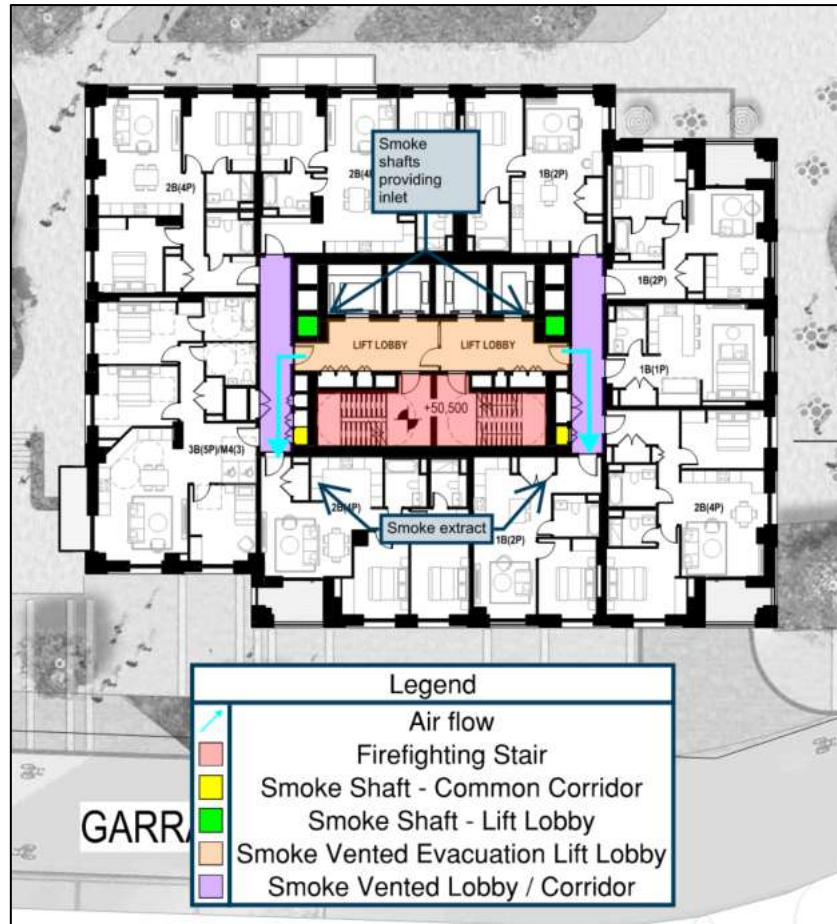


Figure 8 – Typical smoke venting configuration

Where corridors have a single direction of escape that exceeds 15 m then a more sophisticated smoke control system will be provided to compensate for the increased escape distance. Push/pull systems consist of two smoke shafts within the corridor. One of these shafts provides fresh air inlet and the other acts as the smoke extract designed to flush smoke from the corridor. This can be seen in the figure below which shows the higher floors of Plot AB. Corridors with a push pull smoke control system can have single direction travel distances of up to 25 m.

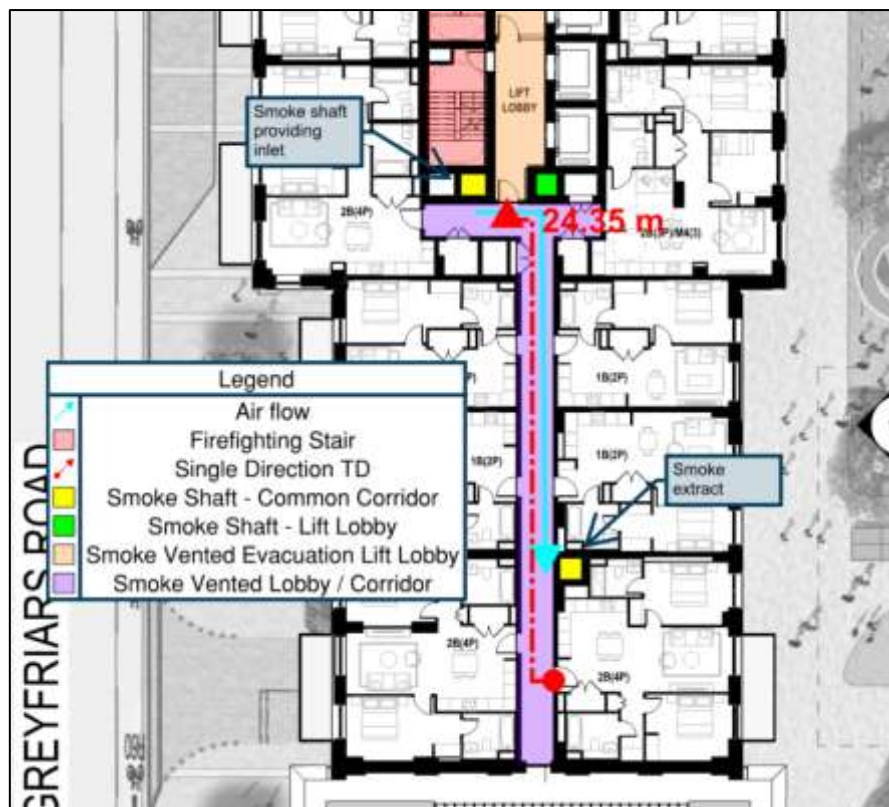


Figure 9 – Push pull system

The performance of the corridor smoke control systems will need to be evaluated using computer modelling (CFD) to demonstrate that it delivers the required outcome e.g. preventing smoke flow into the lift lobbies and clearing the corridor reasonably quickly. This evaluation will be carried out post planning.

Some design choices can have a bearing on how well these systems perform. For example, it is recommended that any flat entrance doors are located such that they are not directly opposite the lift lobby doors as the buoyancy pressures of a hot smoke layer can result in smoke being driven into the lift lobby when they are in very close proximity to one another.

Guidance also recommends that the smoke shafts are within 5 m of the end of the corridor unless it can be proved that adequate performance is achieved. This will be evaluated as part of the CFD study where required.

6.2 Common Stairs

Each floor has access to at least two protected escape stairs. These are designed as fire fighting stairs.

6.3 Final Exits

The final exit from the firefighting stairs should either be directly to outside or via a corridor protected to the same standard as the stair it serves.

The final exit corridor will be designed to achieve two hours fire resistance. Any rooms that adjoin the final exit corridor will need to be separated from that corridor by smoke vented lobbies. The smoke vent system in these lobbies will need to protect against smoke ingress into the final exit route. This is often achieved by connecting these lobbies to the smoke shafts serving the higher floors using high level fire rated ductwork.

Similar measures to those described on the higher floors are also required to protect the evacuation lift lobbies at the final exit level.

Within the current design, smoke venting should be provided to the following areas: Resi Entrance, refuse room, car park, cycle store as well as corridors adjacent to the evacuation lift lobby. This can be seen in the figure below.

One of the final exits discharges out into a colonnade as shown in the figure below. The concern is that smoke from a fire on the ground floor may flow under the ceiling of the colonnade and affect the final exit.

This is deemed acceptable due to several mitigating factors.

The colonnade is a double height space meaning the smoke would be at a high level and much less likely to affect the final exit compared to a similar colonnade with a lower ceiling height.

Occupants using this stair also have an alternative escape route away from the colonnade via the connection in the lift lobby and final exit to the north.

The colonnade soffit could be inclined so that it encourages smoke flow towards the opening.



6.4 Ancillary and Amenity Areas

Ancillary and amenity areas should meet travel distance limits from table 16 of BS9991. This has been extracted below (see Figure 10).

The ancillary areas at P1 and P2 have been reviewed extensively during RIBA 2 and most of the rooms have compliant escape distances. There are a few rooms where escape distances are slightly extended. These will need further development in RIBA 3.

It may be possible to justify small extensions in escape distance particularly in some of the lower fire risk rooms e.g. water tank rooms etc.

Table 16 — Maximum travel distances in ancillary areas

Ancillary area	Maximum part of travel distance within the room or area		Total maximum travel distance to the nearest storey exit	
	Escape in one direction only	Escape in more than one direction, in directions 45° or more apart	Escape in one direction only	Escape in more than one direction, in directions 45° or more apart
	m	m	m	m
Engineering services installation rooms	9	18	18	45 ^{A)}
Boiler rooms	9	18	18	45 ^{A)}
Fuel storage areas	9	18	18	45 ^{A)}
Transformer, battery and switchgear rooms	9	18	18	45 ^{A)}
Refuse stores	9	18	18	45 ^{A)}
Communal lounges and common amenity areas	18	45 ^{A)}	18	45 ^{A)}
Covered car parks	18	45 ^{A)}	18	45 ^{A)}
Bicycle stores	9	45 ^{B)}	18	45 ^{A)}
Commercial and institutional kitchens	9	18	18	45 ^{A)}
Staff rooms, e.g. offices	18	45 ^{A)}	18	45 ^{A)}
External and rooftop plant/ weather protected plant	60	200	60	200

^{A)} This may include up to 18 m with escape in one direction only.

^{B)} This may include up to 9 m with escape in one direction only.

Figure 11 - Escape Distances in Amenity and Ancillary Areas

6.5 Mobility Impaired Occupants, Evacuation Lifts and Lobbies

All lifts in the buildings will be designed as dual purpose fire fighting and evacuation lifts.

Lifts should be designed in accordance with BS EN 81-20. A temporary waiting space should be provided with minimum dimensions given in Figure 11 below which has been extracted from BS9991. The temporary waiting space should be fitted with an emergency voice communication system in accordance with BS 5839-9.

The smoke control provisions discussed in earlier sections will be designed to protect the evacuation lift lobbies from smoke ingress providing a temporary place of safety whilst occupants call the lift.

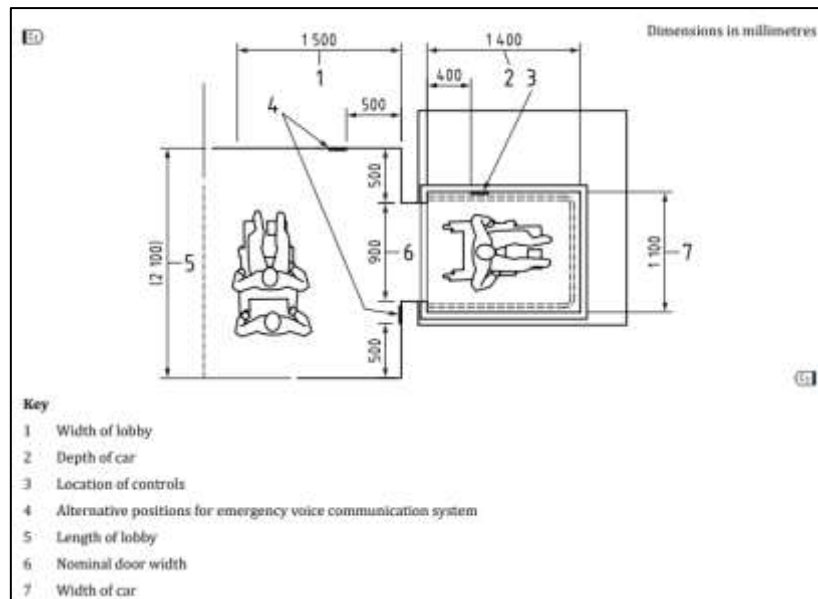


Figure 12 – Lift and lobby minimum dimensions (Figure 14 from BS9991)

7.0 COMMERCIAL MEANS OF ESCAPE

Escape routes serving the commercial spaces will be completely separate from those serving the residential.

Each commercial space will be provided with two means of escape. This may be exits to outside e.g. at ground or onto the podium or via protected escape stairs.

8.0 STRUCTURE AND COMPARTMENTATION

8.1 Structure

Plots AB and plot D have a top storey height of over 30m, therefore, the structure will be designed to achieve two hours fire resistance. All structure at podium level including any party walls and the podium itself will also be constructed to achieve two hours fire resistance.

8.2 Compartmentation

Compartment walls and floors will be provided to minimise the risk of fire spread internally. The following compartmentation is expected. This table will be expanded to cover the various ancillary and amenity areas as the design progresses.

Area	Fire Resistance Period
Walls separating residential and commercial occupancies	120 minutes
Walls between residential flats and common corridor	60 minutes
Walls separating flats from one another	60 minutes
Compartment floors	120 minutes
Firefighting Stair	120 minutes

Table 2: Compartmentation requirements

8.3 Internal Linings

The internal wall and ceiling linings should achieve the classifications described in the tables below

Location	European Class
Rooms no larger than 4m ²	D-s3, d2 or better
Circulation spaces within dwellings	C-s3, d2 or better
Common areas of blocks of flats and other circulation spaces	B-s3, d2 or better

Table 3: Wall and Ceiling Linings in Residential Areas

Location	European Class
Rooms no larger than 30m ²	D-s3, d2 or better
Other rooms	C-s3, d2 or better
Other circulation spaces	B-s3, d2 or better

Table 4: Wall and Ceiling Linings in Commercial Unit

9.0 FIRE FIGHTING FACILITIES

9.1 Firefighting Vehicle Access to the Site

Fire vehicle access is provided at street level via Station Hill, Garrad Street and Greyfriars Road for residential areas and below podium levels.

Access for fire appliances should meet the guidance from the table below for a pump appliance.

Appliance type	Min. width of road between kerbs	Min. width of gateways	Min. turning circle between kerbs	Min. turning circle between walls	Min. clearance height	Min. carrying capacity
	m	m	m	m	m	t
Pump	3.7	3.1	16.8	19.2	3.7	12.5
High-reach ^{A)}	3.7	3.1	26.0	29.0	4.0	17.0

^{A)} Because the weight of high-reach appliances is distributed over a number of axles, their infrequent use of a carriageway or route designed to 12.5 t is not likely to cause damage. It would therefore be reasonable to design the road base to 12.5 t, although structures such as bridges would be expected to have the full 17 t capacity.

Table 5 - Example of measurements for a typical vehicle access route (Table 18 from BS9991)

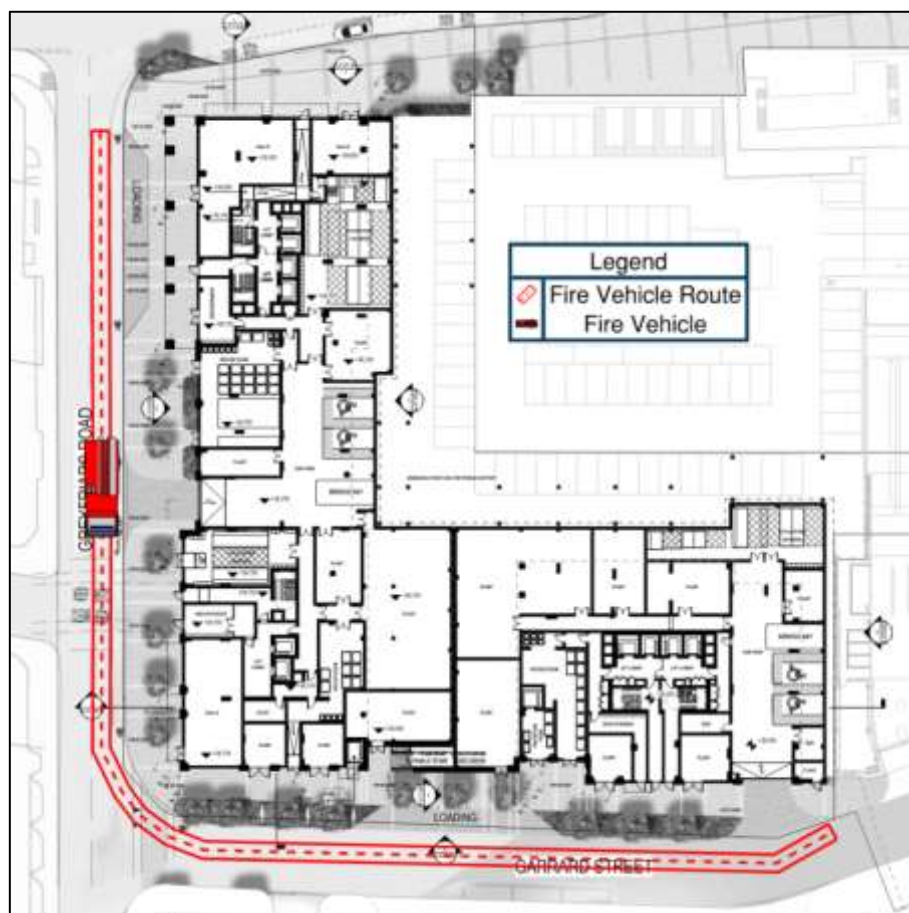


Figure 13 – Fire vehicle access

9.2 Wet Risers and Hose Cover

The two buildings will be fitted with wet risers in each firefighting stair. The inlet connection to the emergency replenishment of the suction tank will need to be within 18 m and in sight of the appliance parking position.

All areas should be within 60m of a wet riser outlet. This can be readily achieved. Hose cover for the typical floors is shown in Figure 13 below.



Figure 14 – Typical upper floor hose distance

9.3 Hydrants

Guidance states that if there is an existing fire hydrant within 100m of the building then additional fire hydrants are not required.

The location of existing hydrants is not known at the time of preparing this report. This is, however, a well-developed area and there will be existing fire hydrants in and around the site which may likely be adequate. However, the exact location of the hydrants will be established and if shortfalls are identified in fire hydrant provision, then new fire hydrants will be provided in accordance with the guidance e.g. such that they are within 90 m of the fire main inlets.

9.4 Commercial Units

The commercial units located on the below podium levels are readily accessible via fire vehicles parking on Greyfriars Road and Garrard Street.

There is some retail/commercial at podium level in both buildings. The piazza to the east of Plot D is designed for fire vehicle access via the bridge as part of the design of the office building in an earlier phase of this masterplan. This route provides sufficient access for the commercial in Plot D.

There may also be some podium retail or community use in Plot AB. This can be accessed within 45 m of a fire appliance parking on Garrard Street as shown in Figure 15 below. Fire fighters will need to ascend the public stair to reach the podium. The height difference is approximately 6.4 m between podium and Garrard Street. This is below the threshold where additional fire fighting facilities would be needed.

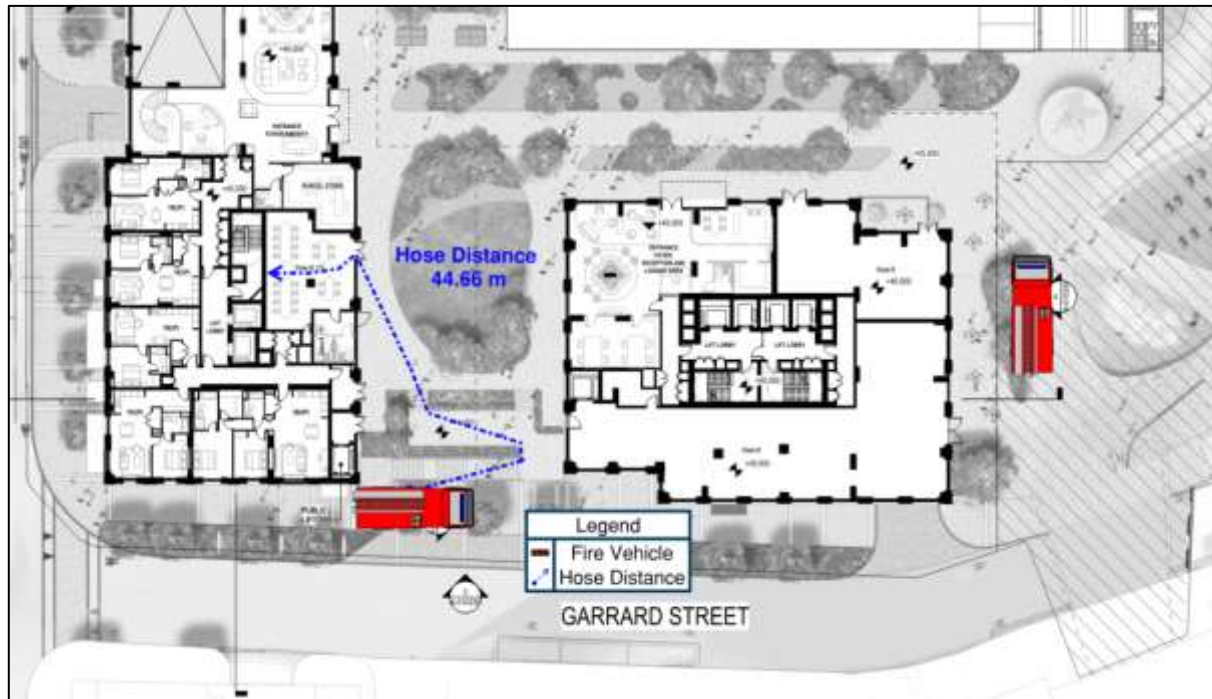


Figure 15 – Commercial hose coverage

10.0 EXTERNAL FIRE SPREAD

10.1 External Wall Construction

Both buildings are defined as relevant buildings as they have floors more than 18m above ground. Consequently, the external walls will be designed to comply with Regulation 7(2) of the Building Regulations to minimise the risk of fire spread across the external walls.

The external walls will be constructed using materials that are either Class A1 or A2-s1,d0. This includes specified attachments such as balconies. There are specific exemptions noted in Regulation 7(3) and these will be followed as appropriate.

10.2 External Fire Spread via the Elevations

The Building Regulations require measures to be taken to minimise the risk of fire spread via the elevations across the site boundary to neighbouring buildings. This can be achieved by locating the building a sufficient distance from the site boundary or by constructing some or all of an elevation from fire resisting construction.

10.2.1 Relevant Boundary

Each building elevation can incorporate some unprotected areas e.g. windows. The site boundary is normally used for the basis of the calculation to determine the permissible amount of unprotected areas in the façade. However, where buildings adjoin a road or railway then it is usually acceptable for the relevant boundary to be taken to the centre line of the road for calculation purposes (e.g. Garrard Street or Greyfriars Road).

The buildings also face onto a future development site (Block C Office). Preliminary assessments have been carried out to define a notional boundary for calculation purposes which both the residential buildings and future office building will be designed to. The relevant boundary is shown in Figure 15 below and at this stage has been set to be at least 3.5 m from the elevations of Plot AB and at least 5 m from Plot D. This also aligns with the proposed party walls on the below podium levels.

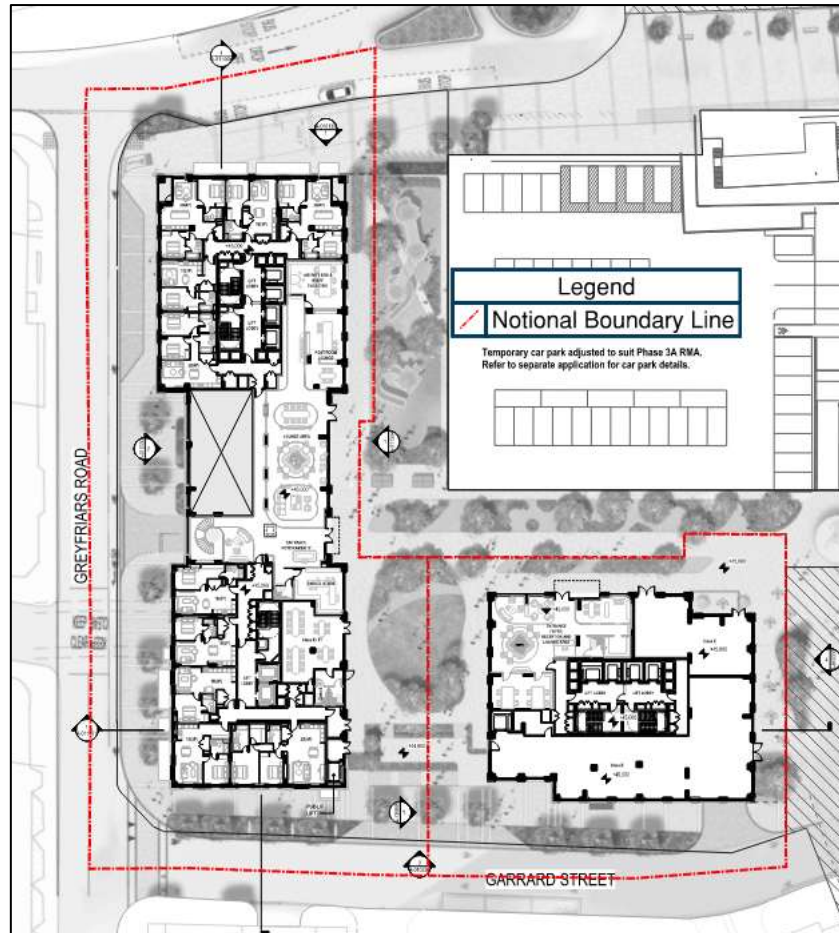


Figure 16 – Relevant boundary

The boundary shown in Figure 16 is the boundary that will be used for calculation purposes.

10.2.2 Flats

The permitted unprotected areas in the apartments can be taken from Figure 16 below which applies to small compartments like flats. The flats are sprinklered which means for calculation purposes it is acceptable to double the actual distance to the boundary (to 7 m for plot AB and 10 m for plot D). Consequently, there would be no restrictions on the extent of unprotected areas.

Minimum distance between façade and relevant boundary	Maximum total unprotected area per compartment
m	m ²
1	5.6
2	12
3	18
4	24
5	30
6	No limit

Figure 17 - Unprotected Areas in Flats (extract from BS9991 Table 10)

Some of the flats may have balconies and this may have a bearing on the assessment. If the balcony is more than 2 m from the boundary (i.e. the balcony depth is 1.5 m or less) then the calculation is based on the distance between the façade and the boundary and would have no impact on the unprotected areas assessment.

If the balconies are deeper then the unprotected areas assessment would be based on the distance between the edge of the balcony and the boundary and may impose some restrictions on the extent of unprotected areas.

10.2.3 Commercial and Amenity

The commercial and amenity spaces are larger compartments and could have a higher fire loading. The approach to assessing unprotected areas is largely the same but a different table would be used to reflect the increased risk.

As a guide at this stage, the table below gives a good indication of the allowable percentage of glazing to the elevations of the amenity, retail, and similar accommodation based on the distance to the boundary, i.e. the site boundary or relevant boundary at podium level. Note that the percentages can be doubled as sprinklers are provided in the non residential uses. For example, the amenity spaces in Plot AB can have unprotected areas of approximately 55% based on the tables assessment.

There are more sophisticated methods of calculation that can be explored in due course as the design progresses which may allow increased unprotected areas. This can also take into account any internal compartmentation which might be found at the amenity levels as well as the specific use of those spaces.

Table 13.1 Permitted unprotected areas in small buildings or compartments		
Minimum distance between side of building and relevant boundary (m)		Maximum total percentage of unprotected area (%)
Purpose groups		
Residential, office, assembly and recreation	Shop and commercial, industrial, storage and other non-residential	
(1)	(2)	(3)
Not applicable	1	4
1	2	8
2.5	5	20
5	10	40
7.5	15	60
10	20	80
12.5	25	100
NOTES:		
1. Intermediate values may be obtained by interpolation.		
2. For buildings fitted with an automatic sprinkler system, see paragraph 13.22.		
3. For open-sided car parks in purpose group 7(b), the distances set out in column (1) may be used instead of those in column (2).		
4. The total percentage of unprotected area is found by dividing the total unprotected area by the area of a rectangle that encloses all the unprotected areas, and multiplying the result by 100.		

Figure 18 - Separation Distance for Commercial, Retail and Other Similar Spaces

10.3 Fire Resisting Return Elevations

It may be necessary to construct parts of the external wall to be fire resisting to maintain compartmentation between adjacent flats where there is a return. Figure 17 below sets out the criteria that will need to be followed.

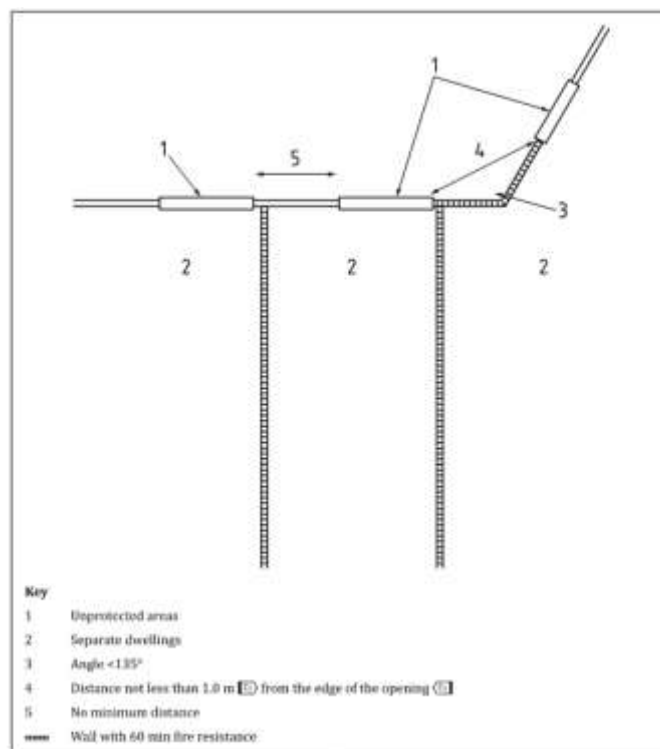


Figure 19- Fire Resisting Return Elevations

10.4 Roof Coverings

The roof should meet B_{roof}(t4) classification.

11.0 INTERFACE WITH FUTURE OFFICE BUILDING

The site also includes an area for a future office building (Building C) as shown in the figure below.

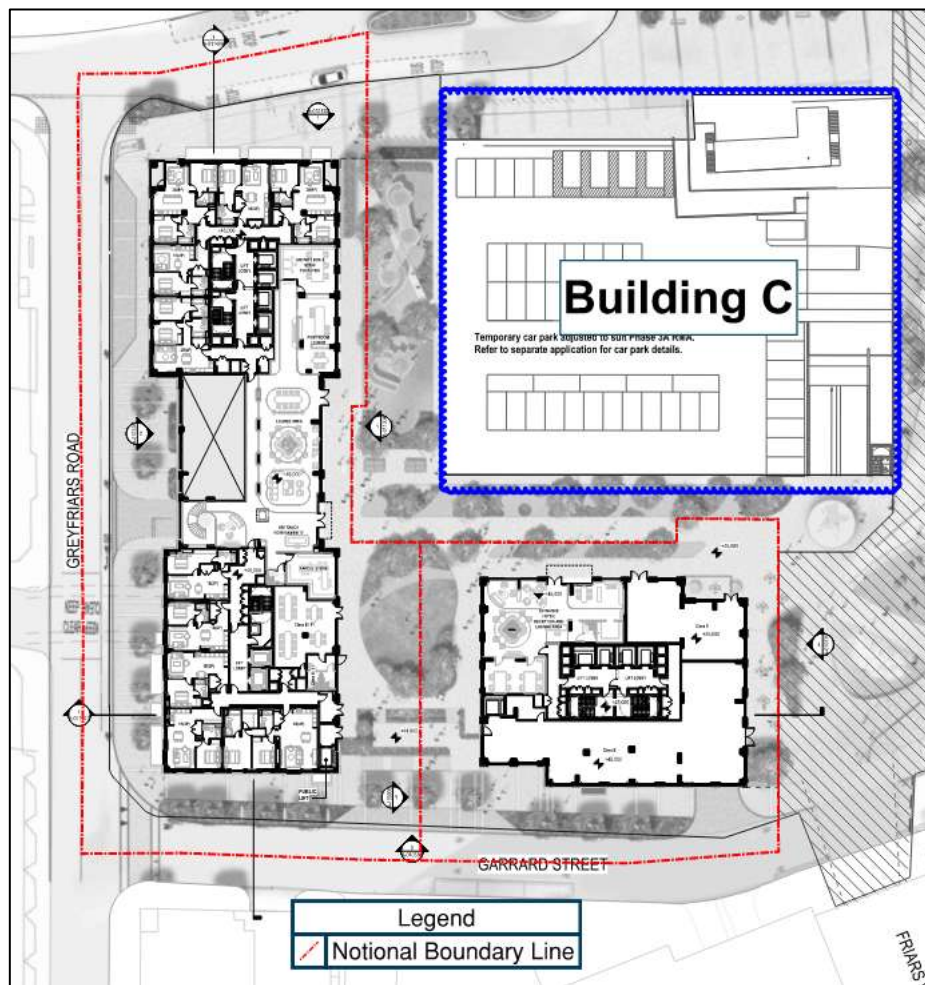


Figure 20 – Interface with Building C

Building C however is not within the scope of this project and does not form part of this planning application. The design of the residential buildings does, however, consider the interface to ensure that the choices made do not impact on the future viability of the office building. The client brief requires the future office building to not be drawn into the Higher Risk Building classification. To achieve this the residential buildings will be separated from the office site by party walls at below podium level such that the buildings are considered as separate buildings.

On the above ground levels the residential elevations will be designed against a relevant boundary (which aligns with the party walls below podium). The future office building will then also be designed against the same boundary.

12.0 FIRE SAFETY MANAGEMENT

12.1 General

Once the building is occupied, it is the responsibility of the management to ensure that all fire safety systems are tested and maintained to ensure their continuous effectiveness. The management should: -

- Be aware of all the fire safety features provided and their purpose
- Liaise with and seek the advice of the fire authority

12.2 Staff

Staff should be trained by competent persons. The training should be at regular intervals and should ensure that all staff know what to do if a fire is discovered; the correct response on hearing a fire alarm, and the correct escape procedures from every part of the building.

A management structure should be provided to ensure that in the case of fire staff are aware of their responsibilities, which should be clearly defined. A chain of command should be provided with clear lines of responsibility, authority and accountability.

12.3 Fire Safety Manual

Before a building is occupied, a fire safety manual should be completed. The purpose of the manual is to clearly define the nature of the fire safety systems provided for the building. It should include: -

- An explanation of the overall fire safety strategy
- Evacuation procedures
- Design documentation to describe the use of each fire safety system
- Staff roles in the event of a fire: their responsibility, authority and accountability
- A detailed maintenance routine

The Fire Safety Manual should be reviewed periodically and when any alterations are made to the building. Details of the suggested contents of the fire safety manual are provided in Section 19 of the Approved Document B and Annex H of BS 9999 Code of practice for fire safety in the design management and use of buildings.

12.4 Maintenance and Housekeeping

It is the role of management to ensure that maintenance is carried out in accordance with the relevant British Standards, so that all fire safety systems are operational in the event of a fire. It is also important that good housekeeping practices are followed. The building management should be aware of any hazardous substances or practices within the building, which increase the risk of fire.

12.5 The Regulatory Reform (Fire Safety) Order 2005

This Order places a duty on the 'responsible person' to ensure, 'as far as is reasonably practical' the safety of his employees and to take such general fire precautions as may be reasonably required to ensure that the premises are safe [i.e. for non-employees].

Under the Order, there is a requirement to carry out and continually update an assessment of the risk of fire to people in and around the premises/building, and to assess and maintain the measures to reduce those risks to an acceptable level. Where there are five or more employees, the risk assessment must be recorded.

A Fire Risk Assessment should be carried out:-

1. On completion of the building fit out, and strictly before first occupation of the building.
2. Regularly, particularly where any changes occur such as changes in the use of the building, the number or nature of occupants, or building works.
3. We would recommend that a fire risk assessment is carried out at least annually.

Other legal duties include: -

1. Keeping a record of the Fire Safety Arrangements. These are the preventative and protective measures for the building.
2. A person must be nominated for any special role identified in an emergency plan.
3. Employees must be consulted about nominations to perform special roles, and about any proposals for improving the fire precautions.
4. Other employers in the building must be informed about any significant risks, which might affect the safety of their employees, and there must be co-operation with them in measures to reduce the risk.
5. Those having control over the workplace have a responsibility to ensure compliance with the regulations in those parts of the building over which they have control.
6. A suitable and readily available method of calling the emergency services must be established.
7. Employees are required to co-operate in ensuring that the workplace is safe from fire.

The order also adopts 'Principles of Prevention'. These include:-

- Avoiding risks;
- Evaluating the risks which cannot be avoided;
- Combating the risks at source;
- Adapting to technical progress;
- Replacing the dangerous by the non-dangerous or less dangerous [particularly with respect to hazardous substances];
- Developing a coherent overall prevention policy which covers technology, organisation of work and the influence of factors relating to the working environment, and;
- Giving appropriate instructions to employees.

13.0 INFORMATION, LIMITATIONS AND ASSUMPTIONS

The information limitations and assumptions used in the preparation of this report are noted below: -

Drawings

This updated report reflects the RIBA 2 design freeze drawings issued to us on 28 November 2025. Dimensions have been taken from these drawings. The following drawings were used: -

Location	Drawing
PROPOSED GA PLAN - LEVEL P2	SHP3-GEN-XX-P2-D-A-011208
PROPOSED GA PLAN - LEVEL P1	SHP3-GEN-XX-P2-D-A-011209
PROPOSED GA PLAN - LEVEL 00	SHP3-GEN-XX-00-D-A-011210
PROPOSED GA PLAN - LEVELS 01 TO 15	SHP3-GEN-XX-00-D-A-011210
PROPOSED GA PLAN - LEVEL 16	SHP3-GEN-XX-16-D-A-011226
PROPOSED GA PLAN - LEVELS 17 TO 19	SHP3-GEN-XX-17-D-A-011227
PROPOSED GA PLAN - LEVEL 20	SHP3-GEN-XX-20-D-A-011230
PROPOSED GA PLAN - LEVEL 21(PLOT D ROOF)	SHP3-GEN-XX-21-D-A-011231
PROPOSED GA PLAN - LEVEL 22	SHP3-GEN-XX-22-D-A-011232
PROPOSED GA PLAN - LEVEL 23	SHP3-GEN-XX-23-D-A-011233
PROPOSED GA PLAN - LEVEL 24	SHP3-GEN-XX-24-D-A-011234
SITE - PLOTS A,B AND D - PROPOSED SITE PLAN	SHP3-GEN-XX-XX-D-A-010030
PROPOSED PLOTS AB & D - ELEVATION - NORTH	SHP3-GEN-ZZ-XX-D-A-011300
PROPOSED PLOTS AB & D - ELEVATION - SOUTH	SHP3-GEN-ZZ-XX-D-A-011301
PROPOSED PLOTS AB & D - ELEVATION - EAST	SHP3-GEN-ZZ-XX-D-A-011302
PROPOSED PLOTS AB & D - ELEVATION - EAST	SHP3-GEN-ZZ-XX-D-A-011303

Building Regulations

This report considers building regulations, which deal with life safety. Property protection and insurance issues are not addressed in this report. Guidance on property protection and insurance requirements can be found

in the document *Approved Document B: Fire Safety (Volume 2) – Buildings other than dwellinghouses Incorporating Insurers' Requirements for Property Protection*, RIBA Publishing 2015.

Other Limitations

Complying with the recommendations of this report will not guarantee that a fire will not occur.

Unless otherwise described in this report, the fire strategy assumes that the building design, the mechanical and electrical systems, construction methods and materials specifications will comply with current Building Regulations guidance, and relevant British Standards and Codes of Practice. The design of mechanical and electrical systems such as fire alarm and sprinklers is a specialist area. Fire Strategy recommendations are given in this report, however, the design and specifications need to be developed at the appropriate stage in consultation with the specialist designers of these systems.

This report has been prepared for the sole benefit, use and information of SH Reading Master LLP and the liability of Jeremy Gardner Associates Limited, its directors and employees in respect of the information contained in the report will not extend to any third party.

© Jeremy Gardner Associates Limited

OFFICES AND CONTACT INFORMATION

Should you have any queries with this report please contact our Birmingham Office.

London Office:
209-215 Blackfriars Road
London
SE1 8NL
Tel: +44 (0)20 7202 8484
london-jga@jensenhughes.com

OTHER JH OFFICES AT:

Manchester Office:
2nd Floor
Swan Buildings
20 Swan Street
Manchester
M4 5JW
Tel: +44 (0)1612366527
manchester-jga@jensenhughes.com

Birmingham Office:
5th Floor,
126 Colmore Row,
Birmingham,
B3 3AP
Tel: +44 (0) 121 281 4513
birmingham-jga@jensenhughes.com

Edinburgh Office:
22 Hanover Street
Edinburgh
EH2 2EP
Tel: +44 (0)131 226 1661
edinburgh-jga@jensenhughes.com

Glasgow Office:
30 Gordon Street
Glasgow
G1 3PU
Tel: +44 (0)141 847 0446
glasgow-jga@jensenhughes.com

Dublin Office:
9 Upper Baggot Street
Dublin 4
D04 A6W7
Tel: +353 (0)1 661 4925
dublin-jga@jensenhughes.com

Belfast Office:
Victoria Place
Wellwood Street
Belfast
BT12 5GE
Tel: +44 (0)2890 230 300
belfast-jga@jensenhughes.com

Galway Office:
Office 3, Monterey Court
Salthill, Galway
Ireland
Tel: +353 (0)91 528 342
galway-jga@jensenhughes.com

