

Advice to the local planning authority

Advice to the local planning authority (LPA) from the Building Safety Regulator (BSR) as a statutory consultee for developments that include a relevant building.

To LPA	Reading
LPA planning ref no	PL/26/0248
Our ref	26-0352
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 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	15/07/2025 - Fire Safety Strategy
Date consultation received	26/03/2026
Date response sent	10/04/2026

1. Substantive response for the local planning authority

Thank you for consulting the BSR about this application.

Headline response from the BSR
Headline Response ('Content')

Scope of consultation

- 1.1. The above application relates to a change of use of part of building from Class E (offices) to Class C3 (dwelling houses) to comprise 17 Flats.
- 1.2. The 'Fire Safety Strategy' document (Foreword) states: *"The building is in three blocks the North, Central and the South block, **this strategy pertains to the North and Central blocks** which will be fully separated at all levels from the South block. The North and Central blocks are connected at all levels other than lower ground."*
- 1.3. The building is formed of three separate blocks North, Central and South. The North and Central Blocks are connected at all levels internally over the varying heights.

- **North Block** comprises ground to fifth floors
 - **Central Block** comprises lower ground to Sixth floors
 - South Block comprises lower ground to seventh floors – does not form part of this application.
- 1.4. Regarding the basement area of the building, section 7 of the Fire Safety Strategy states: *“Ancillary accommodation will be provided at basement floor level, the accommodation will be for occupants use only and will be ancillary to the main use of the building.”*
- 1.5. The proposed change of use of the double height attic roof plant areas over the North and Central blocks for use as duplex accommodation consists of:
- **Fifth Floor North Block:** Provision of 11 new Duplex Units number residential units in the attic space over the north block served by three means of escape.
 - **Sixth Floor Central Block:** Provision of 6 new Duplex Units number residential units in the attic space over the central block served by two means of escape.
- 1.6. The Fire Safety Strategy dated 15/07//2025 states that the adopted fire safety design standard is BS 9991. Additionally, BS 9999 is referenced in the document. The BSR has assessed this application on that basis.

Planning history related to this address

- 1.7. The BSR 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.
- 1.8. Additionally, the Fire Safety Strategy (Foreword) states: *“A previous PD permission has been granted for the lower floors for the change of use to residential accommodation.”*

Previous consultation

- 1.9. A planning gateway one substantive response was issued on 14/01/2026 ('Content'), under the reference 26-0021 in relation to a consultation (LPA Ref: PL/26/0012) received on 08/01/2026. The consultation related to the South Block. The Fire Safety Strategy document used for the assessment was dated 09/12/2025.

Current consultation

- 1.10. The BSR received this consultation request on 26/03/2026. The email from the LPA informed that *‘the agent has now submitted an updated Fire Strategy Report... I attach that and the updated plans submitted separately yesterday by the agent’* and that plans and documents were available on the LPA register, referred from this point onwards as “the consultation letter”. For the avoidance of doubt, this substantive response is in relation to the consultant’s letter.

- 1.11. Due to the number of separate prior approval applications regarding this building, it should be noted that the BSR **has assessed this prior approval application** using the documents provided on the planning register **for PL/26/0248**. 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.
- 1.12. In summary, HSE has only assessed this building from the *'change of use of the roof attic plant of the North and Central Blocks for use as residential duplex apartments'* elements of this building.
- 1.13. The Fire Safety Strategy states: *"The upper floors are provided with two fire fighting stairs and an escape stair."*
- 1.14. Relating to the proposal, the Fire Safety Strategy document states:
"Proposed Provisions:
- Domestic **sprinkler coverage** to all new residential units and common areas other than stairs to **BS 9251 2021**
 - Emergency Lighting
 - Fire Detection alarm system with L3 coverage in landlord areas
 - Fire detection and alarm system coverage to LD1 standard within residential units.
 - **Dry riser to the main stairs to Stairs 1 and 2**
 - **Mechanical Ventilation to the residential corridors with CFD analysis**
 - 1 SQM AOV at roof level or at the highest ceiling level **within the stairs**
 - 1sqm Openable window to the common central stairs where on an external elevation
 - Provision of **Fire Fighting lift/shaft including stairs to Stars 1 and 2**
 - Provision of Evacuation Lifts to all stairs"
- 1.15. The BSR welcomes the provision of two firefighting shafts for the North and Central blocks.
- 1.16. Relating to the external wall system, the Fire Safety Strategy states: *"...**External walls** are existing and are of concrete construction and **achieve a rating of Class A2 s1 d0** in accordance with Table 9. The external surface of the building is constructed from a material that does not support fire spread and therefore endanger people in or around the building.... **The external wall will achieve a Class A2 s1 d0 classification.**"*
- 1.17. Following a review of the information provided in the planning application, the BSR is content with the fire safety design as set out in the project description, to the extent it affects land use planning considerations. However, the BSR 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 the BSR's substantive response and should not be used for the purposes of decision making by the local planning authority.

Previous supplementary information

- 2.1 The BSR advises that the previous substantive response (SR) (26-0021) is read in conjunction with this SR due to additional items previously referred to in the main part and supplementary section not included here, which may still be relevant. These include:
- Fire service access and facilities
 - Mixed use building
 - Smoke ventilation system – CFD
 - Sprinkler system

Smoke ventilation system - CFD

- 2.2 The Fire Safety Strategy (Introduction) 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”.*
- 2.3 The above is noted, however the same document (Proposed Provisions) states: *“**Mechanical Ventilation** to the residential corridors with CFD analysis”.*
- 2.4 Accordingly, it will be for the applicant to demonstrate compliance at later regulatory stages.

Flood risk zone

- 2.5 The BSR notes that a ‘Flood Risk Assessment’ (dated 23/03/2026 Rev. B) has been carried out for the development and that section 1.3 (Introduction) of said document states: *“The site is primarily located within Flood Zone 1, **with a small encroachment of Flood Zone 3** through the centre of the site, and in the southeastern edge.”*
- 2.6 Whilst the BSR acknowledges that the ‘site is primarily located within Flood Zone 1’, the BSR advises that consideration is given to the provision of fire service access and the means of escape in light of the flood risk. Reasonable fire service access must be provided at all material times. “Material times” generally means when the building is occupied. The local fire and rescue service may have specific procedures and guidance about fire service access in this context. They will be involved in the consideration of the building control application and are a statutory consultee under the Fire Safety Order. Additionally, the BSR advises that consideration is given regarding the potential effect of flood water on fire safety systems. However, the specifications and resilience of these systems may be considered at the building control stage.

Yours sincerely

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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**
- **London Plan policy compliance**