

# 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.

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| <b>To LPA</b>                     | Wokingham                                                                                                                                                                         |
| <b>LPA planning ref no</b>        | 251814                                                                                                                                                                            |
| <b>Our ref</b>                    | 25-0627                                                                                                                                                                           |
| <b>Site address</b>               | 400 Regus House Thames Valley Park Drive Wokingham RG6 1PT                                                                                                                        |
| <b>Proposal description</b>       | Prior approval submission for erection of a two storey upwards extension to provide 32no residential units on the 4th and 5th floor with associated plant, car and cycle parking. |
| <b>Date on fire statement</b>     | 22/01/2025                                                                                                                                                                        |
| <b>Date consultation received</b> | 26/08/2025                                                                                                                                                                        |
| <b>Date response sent</b>         | 03/09/2025                                                                                                                                                                        |

## 1. Substantive response for the local planning authority

Thank you for consulting HSE about this application.

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| <b>Headline response from HSE</b>      |
| Headline Response from HSE ('content') |

### Scope of consultation

- 1.1. The above application relates to a prior approval submission for erection of a two storey upwards extension.
- 1.2. This Prior Approval Application (251814) has been submitted under Schedule 2, Part 20, Class AA, (new dwellinghouses on detached buildings in commercial or mixed use) of the General Permitted Development Order 2015 for a two-storey upwards extension providing 32 residential units.
- 1.3. Regus House is a proposed 6-storey (plus basement) mixed-use building with a height of 19.65m.

- 1.4. A document titled 'Concept Fire Strategy' (dated 17/07/2025) describes the existing building as a 4-storey office building above ground, with an additional Basement Level (B, G+4). The existing building has an approximate footprint of 973.77 m<sup>2</sup> and has a building height of 12.45m above ground. The storeys between Ground Floor and Level 3 are designated as office space, while Level 4 and Basement Level serve as plant use.
- 1.5. Paragraph 2.1.3 of the Concept Fire Strategy states: *"The project will **comprise the extension of the existing office building to provide two additional residential storeys** above and rooftop plant equipment, resulting in 6 above ground storeys (G+6). **Ground Floor to Level 3 and Basement Level will be maintained as office use and plantroom, respectively.** The proposed building will feature a reduced footprint of approximately 785.92 m<sup>2</sup> and an increased building height to 19.65 m."*
- 1.6. Information provided in section 7 of the fire statement states: *"**The building will be a mixed-use development, comprising office accommodation below and residential accommodation above.** The plans have been designed to ensure that each use functions independently, with separate stair cores provided for the residential floors. From both evacuation and fire service access perspectives, **the office and residential uses are completely independent.** Where more stringent requirements apply to the residential use—such as sprinkler protection and external wall performance—these higher standards have been adopted throughout the building."*
- 1.7. It is noted that prior approval under Class MA, Part 3, Schedule 2 of the General Permitted Development Order (2015) was given on 20/09/2024 for the change of use of the ground, 1st, 2nd and 3rd floors to 62no residential dwellings (use Class C3).
- 1.8. The fire statement dated 21/01/2025 states that the adopted fire safety design standards are Approved Document B vol 1 and Approved Document B vol 2. HSE has assessed this application on that basis. It is noted the fire statement and 'Concept Fire Strategy' were helpfully detailed and informative.

### Previous consultation related to this address

- 1.9. HSE received a consultation request on 03/09/2024 for **planning reference 241853** and responded on 20/09/2024, under the HSE reference pgo-5811, with the headline: 'Concern'.
- 1.10. The 'Cover Letter' (dated July 2025) related to this planning application (251814) states: *"This application follows a previously refused prior approval application (ref. **241853**) on the grounds of fire safety impact."* This is noted.

### Consultation

- 1.11. HSE received this consultation request (251814) on 26/08/2025. The email from the LPA informed HSE that *'the existing building appeared to continue to operate as offices with manned reception desk. Therefore, the Prior Approval which has been granted for conversion of existing offices to residential accommodation (241855) has not been implemented.'* HSE previously alerted the LPA to the limitation placed on the use of Class AA, namely that applicants cannot use Class AA if the "permission" to use the

building for residential use was gained under Class MA. The applicant asserts in its letter that the building is in use as an office, regardless of the outstanding prior approval permission under Class MA to change the use of the existing office floors to residential use. For the avoidance of doubt, this substantive response is in relation to the consultant's letter.

- 1.12. Section 10 of the fire statement states: *"The residential levels on fourth and fifth floor will feature two firefighting shafts and one additional protected stair, all provided with a dry rising fire main. Each stair will be fitted with a 1.0m<sup>2</sup> automatic opening vent (AOV) at the head of the stair and dry fire main outlet."*
- 1.13. HSE welcomes the provision of two firefighting shafts and also one protected stair within the residential aspects of the development.
- 1.14. Paragraph 2.1.2 of the Concept Fire Strategy states: *"The office and residential floors will be served by separate and independent stairs; **the building uses with therefore function independently in terms of access and egress.**"* Additionally, Table 4 of the same document states: *"The stairs serving the office and residential floors will be separate and independent for each respective use, **with no connection established between the office and the residential floors.**"*
- 1.15. 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 operations

- 2.1. The proposed floor plans appear to show the firefighting lifts running blind through 1st to 3<sup>rd</sup> (currently office) floors. Fire safety standards states where a fire-fighting lift is intended to run blind through a number of floors, it should be determined that there is adequate access for fire-fighting personnel to set up a bridgehead on any required floor. Where lifts are proposed to run blind there should **be early consultation with the local fire and rescue service**. The firefighting lift is used to carry heavy firefighting equipment to the bridgehead location, therefore, firefighters would have to carry equipment up the stairs to establish a bridgehead in these stairs. Additionally, the cited fire safety standard states that the building shall be designed and constructed so as to provide reasonable facilities to assist fire fighters in the protection of life, i.e. **access** into and **within the building for firefighting personnel** to search for and rescue people **and to fight the fire**.
- 2.2. Firefighting in high rise buildings is launched from a 'bridgehead' location in a firefighting shaft served by a firefighting lift. A fire-fighting lift is used to transport fire-fighters and their equipment **to a floor of their choice**, typically established on a floor below the

fire, **both the fire-fighting lift and stair are used together during fire-fighting operations.**

- 2.3. In this instance, internal alterations to allow the fire service to access the floors below the proposed 4<sup>th</sup> and 5<sup>th</sup> floors to set up a bridgehead for firefighting operations - whilst still separating the office aspects of the building from the residential stairs - is unlikely to affect land use planning considerations. However, HSE advises **early consultation with the local fire and rescue service**. Accordingly, it will be for the applicant to demonstrate compliance at later regulatory stages.

### **Smoke ventilation system - CFD**

- 2.4. Section 7 of the fire statement states: ***“One portion of the common corridor in the proposed layouts will feature extended travel distances along the corridors, which require additional fire safety measures to ensure compliance with regulations and occupant safety. Hence, two sets of push-pull systems will be introduced to ensure effective and safe extraction of smoke so that the corridor remains safe for evacuation during a fire. A cross-corridor door will also be introduced to prevent smoke from spreading between sections of the cross-corridor, ensuring that the smoke from one section does not encroach on the adjacent section. The design will be further supported by computational fluid dynamics (CFD) modelling which will be carried out during subsequent design stages.”***
- 2.5. 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.

Yours sincerely

*Stephen Gallagher*  
Stephen Gallagher  
Fire Safety Information Assessor

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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