

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	Wokingham
LPA planning ref no	241853
Our ref	pgo-5811
Site address	400 Regus House Thames Valley Park Drive Wokingham RG6 1PT
Proposal description	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.
Date on fire statement	23/05/2024
Date consultation received	03/09/2024
Date response sent	20/09/2024

1. Substantive response for the local planning authority

Thank you for consulting HSE about this application.

Headline response from HSE
Headline Response from HSE ('Advice to LPA' - Concern)

Scope of consultation

- 1.1. The above application relates to a prior approval submission for erection of a two-storey upward extension to provide 32no residential units on the 4th and 5th floor with associated plant, car and cycle parking.
- 1.2. 400 Regus House is proposed as a 6-storey (plus basement) residential building with a height of 19.6m.

- 1.3. This application (LPA Ref: 241853) has been submitted under: Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) - Schedule 2, Part 20, Class AA – new dwellinghouses on detached buildings in commercial or mixed-use.
- 1.4. The fire statement dated 23/05/2024, states the adopted fire safety design standard is BS 9991. HSE has assessed this application on that basis.

Consultation

- 1.5. Following a review of the information provided, HSE has concerns in relation to fire safety matters, relevant to land use planning considerations as described below.

Means of escape / Mixed-use

- 1.6. The proposed ground, first, second and third floor plans show the central stair (proposed firefighting shaft) connecting with 'Existing office use'. The cited fire safety standard states that any stair serving a dwelling within a mixed-use development should not communicate with any other occupancy.
- 1.7. Design changes necessary to provide separated means of escape will affect land use planning considerations such as the design, layout and appearance of the development.

Means of escape / external stairs

- 1.8. The proposed elevation plan drawings show the provision of external stairs. It should be noted that the cited fire safety standard states that external stairs should not form part of an escape route in building of this height.
- 1.9. Design changes necessary to provide alternative means of escape will affect land use planning considerations such as the layout and appearance of the development and the spaces available for, and number of dwellings.

Fire service access and facilities

- 1.10. Section 7 of the fire statement states: *"As the area of each floor exceeds 900 m², the guidance **recommends that two firefighting shafts are provided**", with section 10 further stating: **"As the area of the building exceeds 900 m² a secondary firefighting shaft is required."** This is noted, however, the same section further states: *"It is therefore proposed that the central stair is designated as the firefighting shaft, subject to confirmation from the approving authorities."**
- 1.11. As highlighted by the applicant and also as stated in the cited fire safety standard, at least two fire-fighting shafts (each containing a firefighting lift and fire main) should be provided in buildings with a storey of 900 m² or more in area, 18 m or more above the fire service access. Design changes necessary to provide this will affect land use planning considerations such as the layout and appearance of the development and the spaces available for, and number of dwellings.

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.

Hydrants

- 2.1. Section 13 of the fire statement states: *"Hydrants could not be located by satellite view. As an existing office building, the provision of hydrants should already be in place. This should be confirmed by a survey and liaison with Royal Berkshire Fire & Rescue Service."*
- 2.2. Additionally, the response to the question about the reliance on the use of existing hydrants and whether they are currently usable / operable (fire statement, section 13) is given as *"don't know"*. Whilst the response *"don't know"* is a valid response on the form, it is not appropriate to this development, which relies on working fire hydrants to feed the proposed fire main. In circumstances such as this, best practice is to check the state of the existing hydrants with the water authority. Without knowing their operability, the proposal might be relying on a disused water main or faulty hydrant.
- 2.3. It will be for the applicant to demonstrate compliance at later regulatory stages. It should be considered that should additional hydrant installations be required, this may affect land use planning considerations such as the landscaping around the development

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