

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	Manchester
LPA planning ref no	143777/FO/2025
Our ref	25-0638
Site address	Land Between Junctions Moss Lane East and Barnhill Street Princess Road Manchester M14 4TE
Proposal description	Erection of six residential blocks, following demolition of existing buildings and structures, to provide a total of 212 dwellings (Use Class C3) comprising: one 10-storey building accommodating 86 apartments; four buildings of 5 to 6 storeys (including attic storeys) accommodating a total of 119 apartments; and 7 three-storey townhouses; together with ancillary communal facilities, associated access, car and cycle parking, refuse storage, landscaping, amenity space, signage, and other associated works
Date on fire statement	23/07/2025
Date consultation received	28/08/2025
Date response sent	17/09/2025

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 consultation relates to a proposed development comprising 6 blocks from A to F. The blocks have different heights. Only Block A exceeds 18m in height, measured from the ground level to the topmost habitable level. Therefore, only block A is designated as a relevant building, and the other blocks will be within the curtilage of a relevant building.

1.2. Block C is planned as “*older person block*” but it is understood that this will not be assisted living area. Block F is planned as dwelling houses.

1.3. The masterplan will comprise.

Block A 27.0 m (Ground + 9)

- Ground Floor Bin Store, Plant room, Management Office, Parcel room, Cycle hub.
- Floor 1 to Floor 9 Flats

Block B 15.0 m (Ground + 5)

- Ground Floor Bin Store, Plant room, Post room, Cycle store.
- Floor 01 to Floor 05 Flats

Block C 15.0 m (Ground + 5)

- Ground Floor Bin Store, Plant room, Post room, Cycle store, Post mobility scooters.
- Floor 01 to Floor 05 Flats

Block D 15.0 m (Ground + 5)

- Ground Floor Bin Store, Plant room, Post room.
- Floor 01 to Floor 05 Flats

Block E 12.0 m (Ground + 4)

- Ground Floor Bin Store, Plant room, Post room, Cycle store.
- Floor 01 to Floor 04 Flats

Block F 6.0 m (Ground + 2)

- Ground to Floor 02 Dwelling houses

1.4. Section 6(e) of the fire statement indicates that the adopted fire safety design guidance is BS 9991:2024 for residential aspect and for all amenity/amenity spaces. HSE has assessed this application on that basis.

1.5. For the avoidance of doubt, this substantive response focuses specifically on Block A only and not the overall masterplan. The other blocks have only been considered in the context of their proximity to the relevant building.

1.6. Following a review of the information provided with this consultation, HSE is content with the fire safety design, to the extent that it affects land use planning. However, HSE has identified some matters 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.

2.1. HSE acknowledges that the *Stage 3 Fire Strategy Report Revision: R02 dated 23/07/2025*, provided with this application is comprehensive. This is welcomed and has supported the HSE’s assessment process.

- 2.2. HSE notes that OFR Consultants Limited have prepared “*Fire Safety Mark-up plans*” contained within Fire Strategy Report with comments highlighting areas of fire safety for further consideration, particularly regarding the staircase protection, the extended travel distance, the position of the mechanical extract shafts and evacuation lift protection. These comments are noted, and it will be for the applicant to demonstrate compliance at later regulatory stages, this may affect land use planning considerations, such as appearance.

Computational Fluid Dynamics (CFD)

- 2.3. Section 7 of the fire statement states; “*It is proposed to adopt a mechanical smoke ventilation system (MSVS) as opposed to a natural option within residential common corridors. BS 9991 suggests that for MSVS an adequate provision for replacement air is essential to ensure that air is extracted from the protected corridor to mitigate the risk of smoke from the flat of fire origin to be drawn in to the evacuation lift lobby or the stair. It is important that the ventilation rate of an MSVS is decided through an assessment of any specific risks within the building and verification through a CFD analysis. It will also include a sensitivity analysis. The travel distance in common corridor of Block A (between Floor 1 and Floor 6) exceeds 15 m. The indicative figures are inserted below. A CFD analysis will be undertaken to demonstrate that tenable conditions are maintained within the common corridor during the means of escape phase.*” It will be for the applicant to demonstrate compliance at later regulatory stages.
- 2.4. Additionally, it is noted that section 2.4.3 (Residential Common Corridor) of the stage 3 fire strategy report states; “*It is important that the ventilation rate of an MSVS is decided through an assessment of any specific risks within the building and verification through a computational fluid dynamics (CFD) analysis or mathematical calculation. A CFD analysis is based upon building specific geometries and, ideally, includes a sensitivity analysis. A CFD analysis should be undertaken at the next design stage to validate the proposed systems and will specify required shaft sizes and extract rates.*”
- 2.5. Where active performance-based solutions are proposed, fire engineering guidance requires a ‘what if’ study to assess the consequence of system failures, such as the failure of such systems to operate correctly. This will be subject to later regulatory consideration; however, this is unlikely to affect land use planning considerations.
- 2.6. It should be noted that British Standard 7974 advocates that building design should eliminate fire safety hazards using construction and layout and avoid an overreliance on active systems, management, and systems maintenance. Accordingly, this is noted and will be subject to consideration at later regulatory stages.

- 2.7. It will be for the applicant to demonstrate that the means of escape is capable of being safely and effectively used at all material times, including during firefighting operations, and that the proposed performance-based solution(s) provides an equivalent level of fire safety to that of code compliance.
- 2.8. This matter will be considered at a later regulatory stage. If the proposed CFD analysis does not support the design, then this may affect land use planning considerations.

Distance to site boundaries.

- 2.9. HSE notes that separation distance calculations have been undertaken as detailed section in 6.4 (Space Separation Assessment) of the Stage 3 Fire Strategy report dated 23/07/2025 which states; *“Preliminary calculations in accordance with BR 187 have been conducted, in order to determine the requisite quantity of fire rated external wall construction to mitigate the risk of fire spread across relevant boundaries. The relevant boundaries on ground floor shown in Figure 22, and the relevant elevation drawings in Figure 23. The calculation results are further tabulated in Table 6.”*
- 2.10. This is noted and it will be for the applicant to demonstrate compliance at later regulatory stages.

Hydrants

- 2.11. 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”. HSE notes the additional comments within section 13; *“Existing hydrants will be surveyed and supplemented with new/additional hydrants as necessary to ensure compliant provision in terms of pressure, flow rate and distance from buildings. For buildings that are provided with dry rising mains such as these buildings, hydrants should be provided within 90 m of an entry point to the building and not more than 90m apart. The locations of the existing hydrants should be confirmed at the next design stage via a suitable utilities survey. It should be demonstrated that the water mains and hydrants can deliver a sufficient flow of water to enable effective firefighting to be undertaken.”* 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.

Yours sincerely

Gareth Underhill
Gareth Underhill
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