

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	143164/FO/2025
Our ref	25/0386
Site address	Albert Bridge House Bridge Street Manchester M3 5AH
Proposal description	Demolition of the existing building complex and the construction of a mixed use development comprising: an office building of up to 18 storeys with ground floor commercial, leisure, food and drink uses (Use Class E) and/ or drinking establishment (Sui Generis), with additional roof top plant, roof top amenity and basement cycle parking; a residential building up to 37 storeys (Use Class C3) with additional roof top plant and basement cycle parking; and, a residential building up to 49 storeys (Use Class C3) with ground floor commercial, leisure, food and drink uses (Use Class E) and/ or drinking establishment (Sui Generis), additional roof top plant, basement cycle parking, Together with relocation of substation, car parking, landscaping and public realm, servicing and access arrangements, drainage, highway alterations and other associated works.
Date on fire statement	06/06/2025
Date consultation received	01/07/2025
Date response sent	22/07/2025

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 development comprises three new-build independent towers.

- 1.2. Tower A 113.80m 38 storeys (Basement to Level 36) and Tower B 150.40m 50 storeys (Basement to Level 48)
- 1.3. Building C will provide office accommodation in a tower comprising a basement, ground and 18 upper floors. All three buildings will feature a mix of public and private amenities at their base.
- 1.4. The basement levels will be used for plant and cycle storage, with no car parking proposed inside any of the towers.
- 1.5. Each tower will feature a central core design with two staircases serving all floors in the buildings. Each upper level will be served by one firefighting shaft and an independent protected escape stair.
- 1.6. Tower C is independent and defined as a separate building and has no impact on the fire safety provisions for towers A and B.
- 1.7. Section 6(e) of the fire statement confirms that BS 9991:2024 has been applied for the residential aspect and BS 9999:2017 for all amenity and commercial spaces. HSE has assessed this application on that basis.
- 1.8. 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.

Fire safety design standards

- 2.1. It is stated in section 6(a) of the fire statement that building A has a top storey height of 113.80m. and building B has a top storey height of 150.40m The applicant is advised that the use of fire safety standard BS9991:2024 may not be appropriate, on its own, due to a building height of over 100m being outside the scope of BS9991.
- 2.2. HSE notes section 8 of the fire statement which states; *"The residential buildings are considered complex due to having a height over 100 m as per BS 9991:2024. As such a Qualitative Design Review is required to demonstrate that the proposed fire safety strategy based on BS 9991:2024 recommendations and additional improvements based on fire engineering solutions and current best practice are adequate to maintain the risk at an acceptable level."* No additional information has been provided regarding the fire

engineering solutions. This early design review and specialist input is particularly appropriate for the following

- the effective separation between escape routes from adjoining evacuation lifts at the exit level given a central core design without compromising lift usability;
- design of mechanical smoke ventilation system protecting residential corridors which also effectively protects lift lobbies for very tall buildings;
- designing a suitable alternative to a low-level way guidance emergency lighting system within the staircases as required by guidance even though there are no such systems available on the UK market.

2.3. Whilst this matter, in this instance, may not affect land use planning, it will be for the applicant, at subsequent regulatory stages, to set out the standards applied to the design and the reasons for adopting the approach. Together with an explanation of how the approach ensures compliance with the functional requirements of the Building Regulations.

Qualitative Design Review (QDR)

2.4. The HSE notes section 7 of the fire statement which states; *“The two residential buildings will have heights in excess of 100m and are therefore considered complex buildings outside the direct scope BS 9991:2024. As such the suitability of the recommendations in the guidance needs to be assessed using a Qualitative Design Review process.”* HSE welcomes the application of the updated design standard (BS 9991:2024) and the ongoing QDR review process.

2.5. The outcome of any QDR review may require subsequent design changes which may affect land use planning considerations such as design, layout, and appearance of the building and it will be for the applicant to demonstrate compliance at later regulatory stages.

2.6. The outcomes of this initial QDR should constitute evidence that demonstrates how any alternative fire engineered approach is appropriate and therefore, demonstrate compliance at later regulatory stages. The applicant is advised that should the design not be acceptable, design changes are likely to affect land use planning considerations and may require further HSE consultation.

Cycle Storage

2.7. The basement plan drawings indicate considerable cycle storage areas, within towers A and B. No further information is provided regarding the location of the cycle charging points, but it is advisable to consider the risk to fire safety due to the presence of electric vehicles (EV) as they contain lithium-ion batteries. The impact that EV vehicles can have on means of escape, particularly when charging is undertaken adjacent to the place of residence.

- 2.8. It is advisable to consider the risk to fire safety due to the presence of electric vehicles (EV) as they contain lithium-ion batteries. Lithium-ion batteries may suffer thermal runaway and cell rupture, releasing large quantities of toxic gases, heat, and smoke before catching fire, as well as post-ignition. When they burn, a large amount of water is required to flow on the batteries, however, fire keeps flaring up even after it appears to have been extinguished. Furthermore, there is a danger of electrical shock to firefighters whilst tackling a fire due to the high voltage used in EVs. Any subsequent design changes may affect land use planning considerations relating to vehicle parking provision in the development.
- 2.9. It will be for the applicant to demonstrate that the proposed fire safety design standard is suitable and that the proposed development complies with building regulations, at subsequent regulatory stages.

Hydrants

- 2.10. Section 13 of the fire statement confirms that the functional status (usable/operable) of the existing public hydrant is “yes”, with the statement *“The development is served by a number of public hydrants surrounding the site which currently serve the existing and adjacent site which feature other high-rise buildings. The locations of the nearest hydrants are within 90 m of the fire appliance parking positions and suitable entrances into the building. The known locations are indicated on the site plan. Information regarding the performance of these hydrants is to be determined. It is expected that they are operable as they currently serve a number of existing developments. The suitability of the available supplies will be reviewed in consultation with the fire and water authorities once they are involved.”*
- 2.11. Without confirmation that there is a suitable water supply, the development might be relying on a disused water main or faulty hydrant. Resolving this issue may affect land use planning considerations such as the landscaping around the development, should additional hydrant installations be required. This will be subject to later regulatory consideration.

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