

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 City Council
LPA planning ref no	142535/FO/2025
Our ref	25-0132
Site address	140 Great Ancoats Street Manchester M4 6DU
Proposal description	Demolition of existing buildings and erection of 2no. new buildings providing up to 758 apartments (Use Class C3), Class E floorspace (comprising flexible office accommodation (Use Class Eg(i)) and Class Ea and b) and associated hard and soft landscaping (including works within the public highway), formation of vehicle accesses and servicing access together with associated works.
Date on fire statement	21/03/2025
Date consultation received	30/04/2025
Date response sent	20/05/2025

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 the demolition of existing buildings and erection of a residential development comprised of 758 dwellings including, one and two bedroom apartments, duplex and studio apartments, in two residential blocks:

- **Building A:** 50 storeys (ground and 49), with 3 basement levels, and a building height, to top floor level, of 153.80m.
- **Building B:** 25 storeys (ground and 24), with 2 basement levels, and a building height, to top floor level of 78.06m.

- 1.2. It is understood that each residential building will be provided with two firefighting shafts containing a firefighting stair, firefighting lift and a wet riser. Therefore, it is noted the residential block will be provided with access to multiple stair cores for escape purposes.
- 1.3. It is understood the basement levels in each block will comprise plant rooms and storerooms for secure cycle storage, storage lockers, folding bike lockers, and cycle storage at basement Level 2 of building B. Changing rooms and a security office are also located in basement Level 1 of building B.
- 1.4. Residents' amenity accommodation is proposed for building A, and includes a lounge, co-working facilities, parcel room, café/bakery and podcast/meeting rooms at ground floor level, gym and spa facilities at Level 20, and a games room/bar and lounge at Level 33.
- 1.5. The amenity accommodation proposed for building B includes, a gym, exercise studio, lobby juice bar and external terrace at Level 4.
- 1.6. It is understood office accommodation will be included between ground floor and Level 3 of building B. The residential and office accommodation within building B is provided with impermeable separation from each other at all levels with the exception of the basement at Level 2.
- 1.7. It is noted that proposed floor plan drawings have been made available on the planning register for both residential buildings, including and a 'typical' floor plan associated with the following floor levels:
 - Building A – Floors 3 to 8, floors 11 to 18, floors 22 to 32 and floors 35 to 47;
 - Building B – Floors 5 to 17 and floors 18 to 24.
- 1.8. HSE has assumed that the 'typical' floor plan represents the proposed layout of all upper floor levels of the buildings listed above. If this is incorrect, the LPA should ensure that relevant floor plans are provided for HSE to assess.
- 1.9. Section 6(e) of the fire statement confirms that the adopted fire safety design standards are British Standard 9991 ('BS9991:2024') and British Standard 9999 ('BS9999:2017')

Consultation

- 1.10. 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 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.

Internal design layout

- 2.1. It is understood from section 8 of the fire statement that the design and construction process is likely to span over several years. The applicant indicates that design changes may be required following consideration of further revisions of fire safety guidance.
- 2.2. It is also stated that: *“The internal layouts may change as the design develops. The fire strategy design will be designed in accordance with BS 9991 and BS 9999 guidance. Any deviations from the guidance will be assessed as the design develops and alternate solutions shall be justified with supporting assessment for review by the Building Safety Regulator, to obtain agreement on compliance with Part B of the Building Regulations.”*
- 2.3. It will be for the applicant to demonstrate compliance at the Building Regulations stage and seek advice from the LPA about the materiality of any changes to the layout and appearance of the building.
- 2.4. Furthermore, following completion and occupation, it will be for the Accountable Person (AP) or Principal Accountable Person (PAP) to demonstrate how building safety risks, such as risks arising from spread of fire, are being managed as part of the safety case regime.

Qualitative design review (QDR)

- 2.5. Section 7 of the fire statement states: *“The building height of Building A exceeds 100m therefore a qualitative design review will be required to determine whether the recommendations of BS 9991 are appropriate. The design of both buildings has considered the guidance within the latest version of BS 9991 (2024) as it relates to land use and planning. Initial considerations of this have included a second stair to serve all floors, firefighting lifts in each plot, wet rising mains for fire service use within the firefighting stairs and mechanical ventilation to common corridors as opposed to natural ventilation.”*
- 2.6. It is therefore noted that a QDR has not yet been undertaken such that it has informed the development design presented to the LPA.
- 2.7. A QDR would provide explanatory information to support the planning application. The outcome of the QDR could result in design changes which may affect land use planning considerations. It will be for the applicant to demonstrate compliance at later regulatory stages.

Smoke ventilation

- 2.8. Section 7 of the fire statement states: *“Corridor/Lobby Ventilation: Corridor ventilation strategy comprised of mechanical extract smoke shafts serving the corridors and natural inlet shafts to serve the lift lobbies. The aim of this is to reduce the risk of smoke ingress into the evacuation lift lobbies. This will be subject to further design team input, computational fluid dynamics (CFD) assessment and stakeholder approval (e.g., approvals authorities).”*

- 2.9. Section 10 of the fire statement states: *“A smoke ventilated lift lobby, in accordance with BS 9991, performing the function of a firefighting lobby. Corridor venting to the common corridors is also provided which is intended to meet recommendations in the latest version of BS 9991 noting that this will be subject to further analysis to confirm the performance of the system.”*
- 2.10. It is noted that the smoke ventilation element will be included as part of the QDR at the next design stage. However, no supporting evidence has been provided as part of this planning application to confirm that design analysis supports the proposed design, as presented to the LPA.
- 2.11. The applicant is advised that should analysis/CFD modelling demonstrate that the design is not acceptable, consequential design changes are likely to affect land use planning considerations and may require further HSE consultation.
- 2.12. Where active performance-based solutions are proposed, guidance requires a ‘what if’ study to assess the consequence of issues such as system failures. 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 an equivalent level of fire safety to that of code compliance is provided.

Means of escape – vertical

- 2.13. Building A plans illustrate the central firefighting shafts share a common lobby on all upper floors and one of the two of the basement levels. It is noted that the basement Level 2 plan shows the provision of cross corridor doors, to separate the shafts. Therefore, it is unclear whether a drafting error is present on the other plans, and if it is intended that every lobby will be provided with cross corridor separation, or if the intention of the applicant is to provide a smoke control pressurization system to the common lobbies affected.
- 2.14. Design changes, comprising internal alterations, are unlikely to affect land use planning. It will be for the applicant to demonstrate compliance at later regulatory stages.

Means of escape – open plan apartments/ studio apartments

- 2.15. Plan drawings illustrate some studio/open plan apartments have cooking facilities located near to the entrance door. The resident(s) would be required to evacuate past the cooking facilities in order to reach reasonable safety in the common protected corridor.
- 2.16. Section 7 of the fire statement states: *“Studio/single storey flat layout: The proposed studio rooms and open plan flats will generally be designed in accordance with the recommendations in BS 9991 for open plan flat design. Guidance notes that the cooking appliances in an open plan apartment should not be adjacent to the entrance of the flat. Careful planning and protection (power cut-off devices) will ensure that a hob fire will not impede occupant egress. Where required, an assessment into the effectiveness of power cut-off devices in conjunction with sprinkler system protection in protecting means of escape will be fully quantified during detailed design. Cooking facilities are generally located more than 1.8m from the escape routes and are shown on the plans.”*

- 2.17. Although the applicant provides some clarity about why an assessment of the design would be needed i.e. justification of hob location that is not at the most remote part of the flats, it is not stated what the assessment will involve.
- 2.18. Furthermore, it is not clear about the ownership of individual flats i.e. a single landlord managing the development or leasehold flats with private landlords. Therefore, it should be considered that although an assessment of the effectiveness of power cut-off devices in conjunction with sprinkler systems will be carried out, where required, replacement of cooking appliances in the future may not be replaced like for like.
- 2.19. Design analysis should provide appropriate hazard assessment and tenability criteria, which include smoke levels, toxicity of smoke, heat production and human behaviours.
- 2.20. As part of the human behaviour analysis consideration should also be given to the occupancy characteristics of the resident/s including mobility impaired people, wheelchair users, people who are deaf or hard of hearing and blind or partially sighted people, as part of the analysis. The psychological and physiological effects of exposure to a fire environment must not adversely affect a person's travel to a place of safety or that of ultimate safety.
- 2.21. It is also noted that section 6 (j) of the fire statement states that the type of accommodation provided within the development will be M4(2), accessible and adaptable dwellings. BS9991:2024 states: *"Open-plan flat layouts should not be provided for accommodation designed for occupants who require assistance to evacuate the flat."*
- 2.22. Design changes, comprising internal alterations, are unlikely to affect land use planning. It will be for the applicant to demonstrate compliance at later regulatory stages.

Mixed use of the development

- 2.23. Information provided in the 'Design and Access Statement' states that a public café and bakery/ co-working area is included at ground floor level of building A.
- 2.24. The ground floor plans for building A illustrate a connection between the residential and non-residential areas. The café and co-working area is provided with access to the fire-fighting shaft of the residential accommodation and the amenity spaces.
- 2.25. Fire safety standards state: *"A mixed-use development is one that contains one or more dwelling(s) and at least one non-residential occupancy... In buildings having more than three storeys above ground level: all stairs serving dwellings not ancillary to the main use of the building should not communicate with any other occupancy in that building."*
- 2.26. Design changes to remove the connection are unlikely to affect land use planning considerations and it will be for the applicant to demonstrate compliance at later regulatory stages.

- 2.27. It is also noted that building B has a shared bin store at basement Level 2. It should be considered that this area must be carefully managed, due to the shared use and associated risks. It will be for the applicant to demonstrate compliance at later regulatory stages.

Fire service access and facilities – Firefighting shaft running blind

- 2.28. Floor plan drawings show that the firefighting lift and stair run blind through the first to third floors of building B. Consequently, there is no firefighting lift access or firefighting lobby at these levels from which firefighting personnel may set up a 'bridgehead'. A bridgehead is part of a building (usually a stair lobby), below the fire from which firefighting teams can be safely committed to attack a fire. Establishing a bridgehead is essential for effective high-rise firefighting operations. The fire statement does not identify where the firefighting bridgehead would be located should a fire occur on the fourth or fifth floors.
- 2.29. Resolving this issue may affect the design, density and layout of the building. It will be for the applicant to demonstrate compliance at later regulatory stages and seek advice from the LPA as necessary.

Hydrants

- 2.30. It is noted the question on the fire statement, section 13, about the reliance on the use of existing hydrants and whether they are currently usable/operable has been omitted, therefore no response stated. HSE are unable to assess this provision without confirmation of usable/operable hydrants. 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. Resolving this issue is unlikely to affect land use planning and it will be for the applicant to demonstrate compliance at later regulatory stages.

Photovoltaic panels (PV)

- 2.31. The roof plan drawings show the proposed installation of photovoltaic panels (PV panels).
- 2.32. Where the roof top installation of PV panels is proposed, it should be noted that fire safety standards require suitable support of cabling to avoid obstruction of escape routes and firefighting access due to the failure of fixings and consideration should be given to ensure that all power supplies, electrical wiring and control equipment is provided with appropriate levels of protection against fire.

Green roofs

- 2.33. The roof plan drawings for both residential blocks illustrate the proposal of Sedum roofs. The external envelope of a building should not provide a medium for undue fire spread. A green roof may constitute a fire hazard as it requires a regular management and maintenance regime. Where green roofs are proposed the roof construction will need to provide sufficient fire resistance to prevent fire spread to any adjoining wall(s).
- 2.34. This document [Fire Performance of Green Roofs and Walls \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/674212/Fire_Performance_of_Green_Roofs_and_Walls.pdf) will provide guidance on the fire performance aspects of green roof and wall construction and maintenance.

2.35. It will be for the applicant to establish that the proposed green/planted roof is viable in relation to fire safety and to demonstrate compliance at later regulatory stages.

Yours sincerely

A black rectangular box redacting the signature of the Fire Safety Information Assessor.

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