

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	137226/FO/2023
Our ref	pgo-3550
Site address	Part Of Plot C And Plot E , Great Jackson Street, Manchester, M15 4NP
Proposal description	Full planning permission for the demolition of existing structures and the phased construction of four residential buildings (two at 47 storeys and two at 51 storeys) to provide 1,746 homes (Use Class C3), flexible commercial, leisure, food and drink uses (all Use Class E) and / or drinking establishment (Sui Generis), basement car parking, cycle parking, landscaping and public realm, servicing and access arrangements, highways alterations and associated works.
Date on fire statement	12/04/2023
Date consultation received	06/07/2023
Date response sent	27/07/2023

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 consultation relates to the demolition of existing structures and erection of a new residential development comprising of 1,746 homes in four residential towers (buildings C7, C8, E1 and E2):
 - Buildings C7 and C8 comprising 51 storeys (ground and 50) with a height of 145.7m to top finished floor. There are 3 basement storeys with a total depth of 8.900m to floor level of basement level 3;
 - Buildings E1 and E2 comprising 47 storeys (ground and 46) with a height of 134.3 to top finished floor. There are 3 basement storeys with a total depth of 8.900m to floor level of basement level 3.
- 1.2. It is understood three basement levels within each tower will contain ancillary accommodation including, plant rooms, store rooms, refuse stores, cycle storage and car parking, with ground floor to second level comprising of flexible use, including commercial spaces on ground floor level. The design standard adopted is British Standard 9999.
- 1.3. It is understood that the adopted fire safety design standard used for the residential is British Standard 9991 and it is noted that the proposal has given consideration to the draft standard BS 9991, which is currently under review following consultation and cannot be relied upon. HSE provides advice to the LPA based on extant fire safety standards and is therefore unable to comment on future draft recommendations, which are likely to be subject to change. HSE has therefore assessed this application based on the extant version of BS 9991:2015.
- 1.4. Following a review of the information provided in the planning application, HSE has identified the fire safety concern(s) described below.

Means of escape

- 1.5. It is noted that commercial units C7-1, E1-1, 2, 3 and 4 and E2-2 link to the residential accommodation by way of the refuse holding stores and lobby to the fire-fighting stairs.
- 1.6. Whilst it is noted that the stair to the ground floor commercial and the stair to the residential floors are separated by lobbies at ground floor, the adopted fire safety standard states:

“Any stair serving a dwelling within a mixed-use development should not communicate with any other occupancy, unless in accordance with a) or b)...a) In buildings having not more than three storeys above ground or access level (small buildings), common stairs that serve both dwellings and other occupancies should be separated from each occupancy by protected lobbies at all levels. b) In buildings having more than three storeys above ground or access level: 1) all stairs serving dwellings, which are not ancillary to the main use of the building, should not communicate with any other occupancy in that building...”

- 1.7. Accordingly, the lobbied communication of commercial and residential staircases is not appropriate as the development is not a small building. Design changes necessary to provide separated means of escape will affect land use planning considerations such as the layout and appearance of the development.

Yours sincerely

27/07/2023

Signed by

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

