Health and Safety Executive

Via Email

Date: 13/01/2026
OFR Ref: MA25128

Re: HSE Substantive Response – 144791/FO/2025, 25-1136 – Weston Student Halls and Pendulum Hotel, 78 Sackville Street, Manchester M1 3BB

To whom it may concern.

The following letter acts as a response to the HSE advice to the local planning authority dated the 9th of January 2026 in relation to the planning submission for development on the Weston Student Halls and Pendulum Hotel, planning reference 144791/FO/2025.

HSE Response Summary

The key concern for the scheme is Fire Service Access. The HSE Commentary is as follows:

Fire Service Access

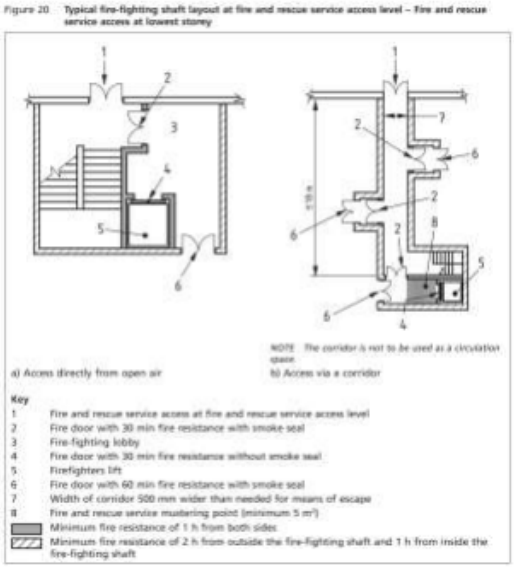
1.10. Section 7 of the *Fire Statement*, states: "*The main access to the central firefighting cores from the access road for Towers A2 and B2 will be via the main reception.*" Also: "*Alternative and direct access to the cores from the outside will also still be available via the rear courtyard however it will not be accessible within sight of and 18m of a fire vehicle parking position.*"

1.11. The fire service access plan provided within section 14 of the *Fire Statement*, shows an excessive travel distance from the appliances parking location to the buildings' entrances / firefighting shafts, for towers A2 and B2. HSE notes the applicant has acknowledged this, however, there does not appear to be any strong rationale for this design choice given there appears to be ample space around and between these buildings to improve access for fire appliances.



Figure 1: Excerpt from Page 3 of HSE Response

1.12. The relevant fire safety standard recommends that the access to a firefighting shaft at ground level should be available either directly from the open air, or by way of a protected corridor not exceeding 18 m in length, and the corridor should not be a circulation space. The corridor is deemed to be part of the fire-fighting shaft, and any access to it from the accommodation should be by way of protected lobbies. This can be seen in the diagram below (extract from BS9999:2017):



1.13. The information provided within the planning application, indicates that the access to the firefighting shafts at the fire service access point adjacent to the fire engine parking position, is via an open reception, rather than a suitably protected route.

1.14. Design changes necessary to improve the fire service access and provide a suitable access route to the firefighting shafts, which are lobbied off from the rest of the building, will be necessary. This is likely to affect planning considerations such as the landscaping and layout of the development.

Figure 2: Excerpt from Page 4 of HSE Response

Supplementary information is also provided on:

- Smoke Ventilation – Computational Fluid Dynamic (CFD) modelling
- Green roofs
- Photovoltaic (PV) Panels
- Hydrants

OFR Response

Overview

OFR notes the HSE response, however believes that the HSE have misinterpreted the Fire Strategy design principles in relation to the Fire and Rescue Service access arrangements.

All cores will have access to a final protected escape route at the ground level which discharges directly to the outside, achieving the recommendations outlined in comment 1.12 which highlight the recommendations of BS 9999 guidance. Therefore comment 1.13 does not reflect the proposed design arrangement. The reception will be designed as any other ancillary room from a fire strategy perspective, i.e. it will only be accessed from the central firefighting cores via a smoke ventilated common corridor.

An additional access route is provided via the reception which will be over and above the minimum recommendations of BS 9991 guidance. An updated markup highlighting this is provided below, with the alternative access routes via the reception highlighted in green.

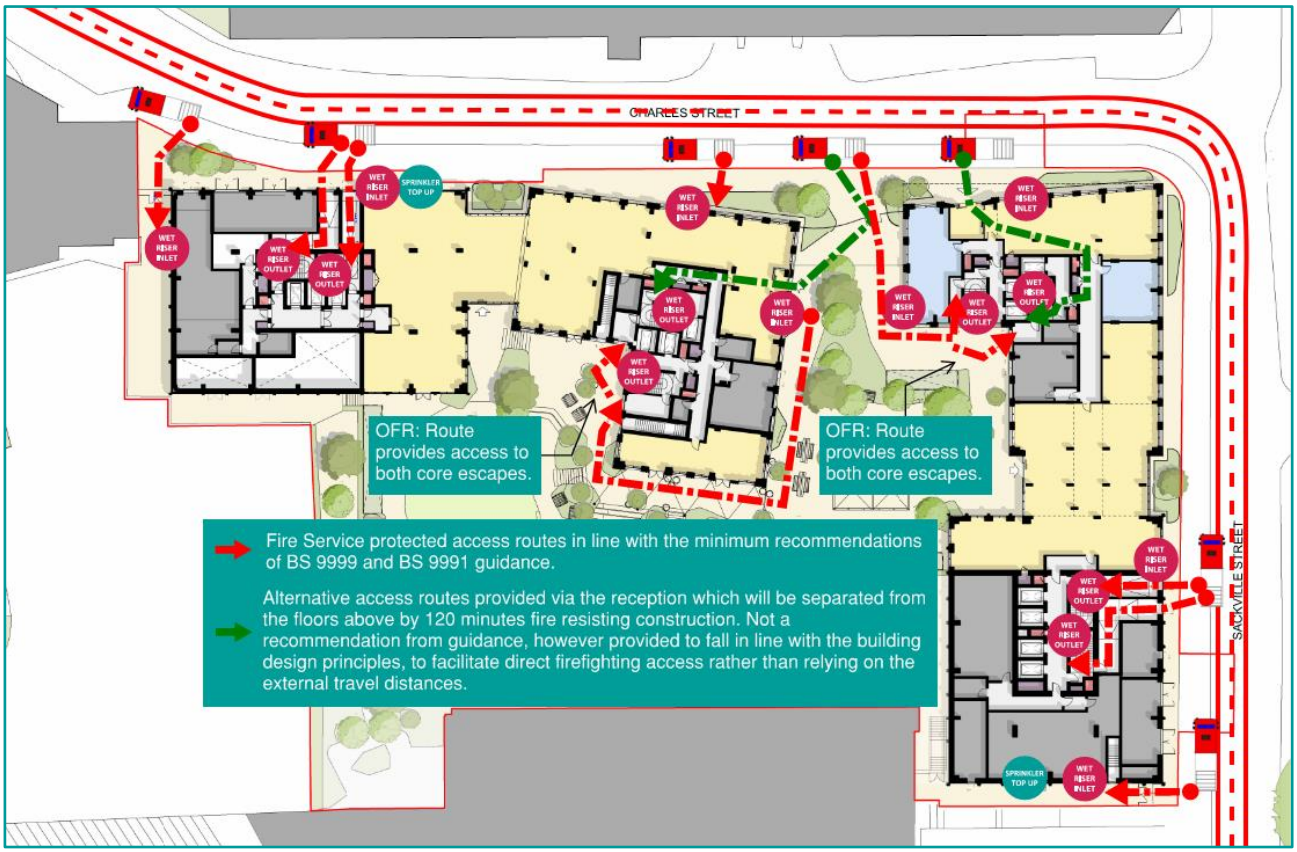


Figure 3: Fire Service Access Arrangement - Highlighting the Alternative Access Provision

Ground Floor Fire Scenario

In the event of a ground floor fire it is unlikely that the Fire and Rescue Service will need access to the central firefighting cores, which are provided to support firefighting operations on the upper levels of the building. It is anticipated that instead, the Fire and Rescue Service would fight the fire from the outside and via the external access points provided as necessary.

In any case, as highlighted above, access would still be available to either core and dry riser inlet to the rear of the building via the highlighted route into a 120 minute firefighting core as per the recommendations highlighted in Section 1.12.

In the event that the Fire Service access the building via this entrance but the route subsequently becomes compromised, there will be a safe alternative egress route directly to the outside via the firefighting core egress route.

Upper Level Fire Scenario

For an upper floor fire, in the event of the Fire and Rescue Service entering the building via the reception, the Ground Floor will be separated from the fire above by 120 minutes fire resisting construction in the form of a compartment floor. This will provide a place of relative safety for the fire service to approach the central cores from.

Accessing the building from this elevation would reduce access times to the central firefighting cores as well as support firefighting access to the firefighting lobby as this access would not be the same route as that intended egress route from the stairs, which discharges directly to the outside at the rear of the building. This would reduce the likelihood of clashes via the stairs and final exit.

The alternative route via the reception, provided in addition to the minimum recommendations, also offers a practical means for the fire service to access the building as the entrance will be:

- Within 4m and 14m of the fire vehicle parking position for Block A2 and Block B2 respectively.
- Within 4m and 18m of the fire main inlet location for Block A2 and Block B2 respectively.
- Within 8m and 14m of the nearest firefighting shaft respectively.

Note: *Based on the current indicative design provisions, which are still subject to further design development.*

Which all can help contribute to a reduced response time in the event of a fire as above the minimum recommendations of Building Regulation guidance recommendations.

The Fire and Rescue Service would also be able to meet the staff located on site at the reception to discuss the incident and review the fire alarm panel, premises information box and other fire safety equipment and information to assist in their operations. This is a common and typical approach in practice that is naturally welcomed by the Fire and Service by promoting quick access to the premises and ability to access site specific information to assess the fire scenario.

External Access

In relation to Section 1.11 which notes that the external travel distances are “excessive”. OFR have noted in the Fire Statement form that this protected access route is to the rear but not within site of the fire vehicle parking position. In BS 9991:2025, there is no recommendation from guidance for a distance from the fire parking position to the building entrance, which OFR interpret to allow flexibility in this distance due to site constraints.

BS 9991 does require fire vehicle parking positions within 18m of the fire main inlets, which as discussed above is achieved. The provision of the alternative access route via the reception however addresses the fundamental concern of Section 1.11 in which the rear cores are accessed by “an excessive travel distance from the appliances parking location to the building’s entrances / firefighting shafts for towers A2 and B2”, where, as outlined above, in the event of a fire scenario requiring access to the firefighting cores for the upper levels, suitable protection will be achieved by the provision for access to be provided via the reception, which will also contain benefits for rapid access and accessibility to on-site fire related information for the Fire and Rescue Service.

OFR Conclusion of HSE Concern

As such, in relation to Section 1.14, OFR consider that the proposed design is suitable and that the functional requirement B5, adequate access for the Fire Service, has been achieved.

As the scheme progresses, OFR will include the above description of the rationale and design recommendations related to this design choice within the Fire Strategy report for the building to highlight how the design is achieved in line with guidance, the enhancements and benefits provided by this design approach as highlighted above and ultimately compliance with the Part B of the UK Building Regulations.

If possible, OFR would welcome a pre-consultation with the Manchester Fire and Rescue service prior to the submission at Gateway 2 to agree the principles of this approach and take on board Fire and Rescue Service comments if applicable.

Supplementary Comments

All supplementary comments are noted and will be addressed as the scheme progresses by the OFR Fire Strategy report and supplementary design information.

Yours sincerely,

[redacted]

Richard Rankin

Director

OFR Consultants