Advice to the local planning authority

Advice to the local planning authority (LPA) from the Building Safety Regulator (BSR) as a statutory consultee for developments that include a relevant building.

To LPA	Manchester
LPA planning ref no	PLA-2026-000312
Our ref	26-0940
Site address	Charles Street Multi-Storey Car Park, Plot H Sister, Charles Street, Manchester, M1 7AR
Proposal description	Erection of three interconnected blocks (T1, T2 and T3) of 8, 10 and 38 storeys including ground, plus basement and plant, comprising purpose-built student accommodation with ancillary internal amenity space (Sui Generis) together with flexible commercial uses (Use Class E); landscaping works, highways, access, servicing, infrastructure and other associated works.
Date on fire statement	04/12/2025
Date consultation received	24/08/2026
Date response sent	14/09/2026

1. Substantive response for the local planning authority

Thank you for consulting the BSR about this application.

Headline response from the BSR
Headline Response **'Content'**

Scope of consultation

1.1 The proposed development consists of three interconnected purpose built student accommodation (PBSA) blocks: an eight storey above ground block (Tower 1); a ten storey above ground block (Tower 2); and a thirty-eight storey above ground block (Tower 3).

1.2 The development comprises two connected basements (serving Tower 1 and Tower 2 & Tower 3 respectively). Tower 1 and Tower 2 are connected at Levels 1 to 8. Tower 2 and Tower 3 are connected at ground to Level 2, with Tower 3 including a two-storey podium.

1.3 The buildings comprise 1,041 PBSA (sui generis) units, with supporting amenity space and associated cycle parking.

1.4 At ground floor level, three flexible commercial units, totalling 659 sqm GEA, are proposed. The proposed uses are flexible use class E (commercial, business, and service, excluding hot food).

1.5 **Tower 3** will be 38 Storeys, (B, G + 37). The building achieves a topmost storey height of approximately 107 metres above ground level.

1.6 **Tower 2** will have a top floor height, of approx. 28.3m. 10 Storeys, (B, G +9)

1.7 **Tower 1** will have a top floor height, of approx. 24.1 m. 8 Storeys (B, G+7).

1.8 The buildings have four firefighting shafts (2 in the lower blocks and two in the main tower) with dual-purpose firefighting/evacuation lifts. One additional escape shaft with evacuation lift and protected stair is located in the lower block.

Consultation

1.9 Section 6(e) of the fire statement confirms that the adopted fire safety design guidance is BS9991:2024 for residential spaces and BS9999:2017 for non-residential areas.

1.10 The applicant is advised that the use of fire safety standard BS9991 may not be appropriate, on its own, due to a building height of over 100m being outside the scope of BS9991. Consideration of the use of BS9991 may be needed in advance of later regulatory stages to be able to demonstrate that the functional requirements of the Building Regulations have been met.

1.11 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.

1.12 Following a review of the information provided with this consultation, the BSR is content with the fire safety design, to the extent that it affects land use planning. However, the BSR 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 the BSR's substantive response and should not be used for the purposes of decision making by the local planning authority.

2.1 The BSR notes the information included in the Plot H Sister Design and Access statement dated 21/08/2026, specifically section 7.4 Fire Strategy, which states; *"Fire safety for all users has been designed into the scheme to ensure regulatory compliance. Early collaboration with Ashton Fire Engineers has been undertaken to ensure the scheme meeting the necessary requirements. For further detailed information, please refer to the fire statement and outline fire strategy supporting documentation prepared by Ashton Fire."* The BSR notes the information included within the fire statement dated 04/12/2025, the outline fire strategy has not been included with this submission.

Smoke Ventilation and comparative computational fluid dynamics (CFD) analysis.

2.2 The BSR notes that section 6 of the Fire Statement dated 04/12/2025 states; *"All blocks within the student accommodation shall incorporate ventilated and unventilated common corridors, the ventilated common corridors will be equipped with a mechanical smoke ventilation system (MSVS), supported by a 0.6m² extract mechanical smoke ventilation shafts (1.2m² Block C). Additionally, each evacuation lift lobby is accessed from a common corridor and is ventilated via passive inlet shafts equal to their mechanical equivalent. All mechanical smoke control systems in the student accommodation will be designed and validated using Computational Fluid Dynamics (CFD) modelling at detailed design stage."*

2.3 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.

2.4 This matter will be considered at a later regulatory stage. If the CFD analysis does not support the design, then this may affect land use planning considerations.

Cycle and mobility scooter storage.

2.5 The BSR notes that although the fire statement dated 04/12/2025 does not indicate accessible housing (M4(2) & M4(3)) will be provide, the *"Planning and Tall Building Statement Plot H, Sister"* document dated May 26 states that 18 accessible studios will

be provided and these are noted within the plan drawings provided. No further information is provided regarding the location of any storage areas for mobility aids or charging points.

2.6 Mobility Scooter guidance for residential buildings has been produced by the National Chief Fire Council (NFCC) which will provide guidance on fire safety provision. Further information in relation to e-bikes and e-scooter can be found at E-bikes and e-scooters fire safety guidance - NFCC.

2.7 Additionally, the basement plan drawings indicate cycle storage areas. 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 are unlikely to affect land use planning considerations, and it will be for the applicant to demonstrate compliance at later regulatory stages.

2.9 Confirmation should be sought regarding whether the type of accommodation provided within the development will be M4(2), accessible and adaptable dwellings, and M4(3) wheelchair user dwellings. BS9991:2024 states: *“Open-plan flat layouts might not be appropriate for occupants who require assistance to evacuate the flat.”*

Photovoltaic Panels

2.10 Roof plan drawings include areas for the installation of photovoltaic panels.

2.11 Where the installation of photovoltaic panels (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. This will be subject to further consideration at a later regulatory stage.

Hydrants

2.12 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"*. 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.

The scope of this substantive response is limited to fire safety matters that are material to land use planning considerations. This does not include matters relating to the determination of an application for:

- **building control approval,**
- **a completion certificate, and**
- **a building assessment certificate.**

This response does not provide advice about compliance with London Plan or local plan policy.