

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	145583/FO/2026
Our ref	26-0504
Site address	Land At 85 Rochdale Road, Manchester, M4 4HY
Proposal description	Erection of a 17-storey residential apartment building (Use Class C3 (a), with associated access, amenity, landscaping, public realm, infrastructure, and other associated works following demolition of existing vacant building on site.
Date on fire statement	26/03/2026
Date consultation received	06/05/2026
Date response sent	14/05/2026

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 (85 Rochdale Road) is for full planning permission for the demolition of the existing vacant building and erection of a 17-storey residential apartment building.
- 1.2 The development is the second phase of a wider development including 87 Rochdale Road (also called Downtown Victoria North). 87 Rochdale Road is under construction and due to complete in 2026.

- 1.3 The proposed development will comprise a residential block rising to the 17th floor (ground + 16). The proposed block will have a height of 49.9 m, measured from the firefighter access level to the topmost habitable storey. The ground floor –will contain a parcel & post, reception, refuse store, amenity, cycle store, substation, LV/HV, plant room, building manager room, and accessible WC, floor 01 to floor 16 - Flats. Furthermore, the Marble Arch Inn, which is a Grade II listed building, is situated adjacent to the site.
- 1.4 Section 6(e) of the fire statement confirms that the adopted fire safety design guidance is BS 9991:2024. The BSR has assessed this application on that basis.
- 1.5 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 acknowledges that the *Fire statement dated 26/03/2026* and *Outline Fire Strategy Report dated 26/03/2026*, provided with this application are comprehensive. This is welcomed and has supported the assessment process.
- 2.2 The BSR notes the information included on the annotated drawings contained within the *Outline Fire Strategy Report Appendix A – Compartmentation Drawings dated 26/03/2026*. Additionally, the BSR notes comments included within Table 01 (*Table 1: Design items need to be resolved*) within the Outline fire strategy report.
- 2.3 It will be for the applicant to demonstrate compliance at later regulatory stages, aspects may affect land use planning considerations, such as appearance and in those circumstances the applicant should seek the advice of the LPA.

Dual-entry fire-fighting lift

- 2.4 The proposed floor plan drawings show that a dual-entry lift is proposed as a firefighting lift. Section 3.7 (Evacuation Lifts) of the outline fire strategy document states; *“Where a dual-entry configuration is adopted for the firefighting lift, it is recognised that this represents a deviation from BS 9991 guidance, and justification will be provided within the detailed fire strategy. In accordance with BS 9991 recommendations, fire curtains will be installed on the entrance-lobby side of the lifts to maintain the required lobby separation and smoke containment. The fire curtain should achieve a minimum of EW60 fire-rated performance.”*

- 2.5 Where active performance-based solutions are proposed, fire engineering guidance recommends a 'what if' study to assess the consequence of system failures, such as the failure of such systems to operate correctly.
- 2.6 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.
- 2.7 Design changes comprising internal alterations only, are unlikely to affect land use planning considerations in this instance. It will be for the applicant to demonstrate compliance at later regulatory stages.

Cycle Storage

- 2.8 The ground floor plan drawings indicate considerable 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.
- 2.9 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.

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.

Computational Fluid Dynamics (CFD)

- 2.12 Section 3.4 (Smoke Ventilation Systems - 3.4.3 Residential Common Corridors) of the Outline Fire Safety Strategy Report states; *“It is proposed to adopt a mechanical smoke ventilation system (MSVS) as opposed to a natural option within residential common corridors; the design of the system should limit pressure differentials so that the door opening forces do not exceed 100 N at the door handle when the system is in operation. The mechanical smoke shaft should also meet the recommendations in BS 9991. Performance of MSVS needs to be demonstrated by Computational Fluid Dynamics (CFD) modelling analysis, which will be conducted at the next stage. The MSVS system includes: a mechanical shaft in each residential corridor, with an indicative free area subject to be confirmed by the CFD analysis; a natural inlet shaft in each lobby with an indicative free area; AOV at the head of both stairs with an indicative free area; Ventilation to lobbies at the ground floor. The indicative free areas could be 1 m² at this design stage.”*
- 2.13 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.
- 2.14 Where active performance-based solutions are proposed, fire engineering guidance requires a ‘what if’ study to assess the consequence of system failures, such as the failure of such systems to operate correctly. This will be subject to later regulatory consideration; however, this is unlikely to affect land use planning considerations.

Building Façade

- 2.15 It is noted that the Space Separation Assessment section of the Outline Fire strategy report states; *“The primary objective of the space separation assessment is to evaluate and ensure that the proposed development does not adversely affect the adjacent historic premises, the Marble Arch Inn. Preliminary calculations in accordance with BR 187 [29] are conducted, in order to determine the requisite quantity of fire-rated external wall construction to mitigate the risk of fire spread across relevant boundaries. The relevant boundaries on the ground floor and the first floor are shown in Figure 5 and Figure 6. The calculation results are further tabulated in Table 6.”* The information included within table 6 (Space Separation Assessment Calculation) is noted and it will be for the applicant to demonstrate compliance at later regulatory stages.

Hydrants

- 2.16 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

[Redacted signature]

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.**
- **London Plan policy compliance**