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
LPA planning ref no	144791/FO/2025
Our ref	25-1136
Site address	Weston Student Halls and Pendulum Hotel, 78 Sackville Street, Manchester M1 3BB
Proposal description	Phased development comprising: (a) Partial removal of existing structures and erection of two buildings comprising purpose-built student accommodation (sui generis), one of 50 storeys and one of 17 storeys with an 8-storey link, together with associated amenity space, external landscaping, highways works, and change of use of the Pendulum Hotel to purpose-built student accommodation; and (b) Removal of remaining existing structures and erection of two buildings comprising purpose-built student accommodation (sui generis), one of 33 storeys and one of part-24 and part-8 storeys with a 1-storey link, together with associated amenity space, external landscaping, and highways works.
Date on fire statement	17/09/2025
Date consultation received	19/12/2025
Date response sent	09/01/2026

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 **full planning application** relates to a new residential development located in Manchester. The *Weston Halls and Pendulum Hotel* development includes the phased construction of purpose built student accommodation (PBSA) use class C3 and will deliver 2.511 beds with associated servicing and ancillary floorspace.

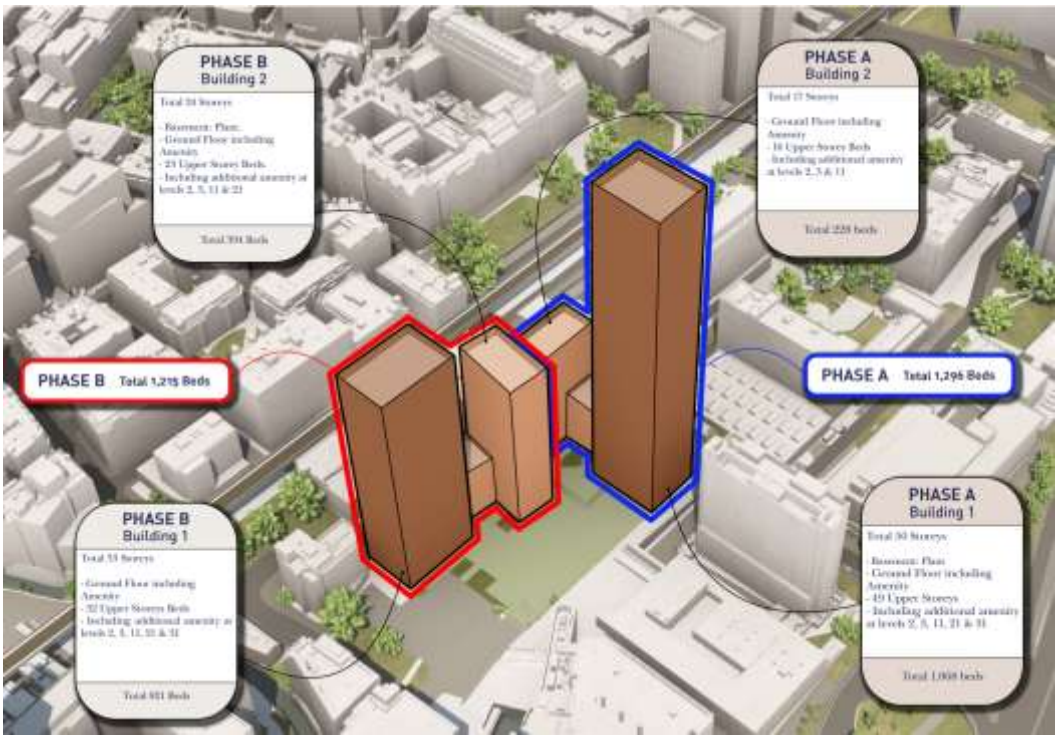
1.2. The Phase A includes the partial demolition of the existing buildings on site, and construction of Block A which will consist of two towers: A1 and A2 (linked on 8 floors, from the ground level to level 7). The remaining elements of the existing buildings will be retained and used as student accommodation during this period.

1.3. The Phase B represents the demolition of the remaining buildings on site, and erection of Block B which will consist of two towers: B1 and B2 (linked at the ground level only).

1.4. The final development will include two independent buildings: Block A (with towers A1 and A2) and Block B(with towers B1 and B2). Each building will contain its own associated amenity spaces and external landscaping and be designed independent of one another.

1.5. Section 6 (b) of the *Fire Statement* confirms that the heights of the buildings will be:

- Tower Block A1: 144.7m (51 storeys: basement B, ground floor GF, plus levels L1 to L49);
- Tower Block A2: 47.4m (17 storeys: ground floor GF, plus levels L1 to L16);
- Tower Block B1: 96.1m (33 storeys: ground floor GF, plus levels L1 and L32); and
- Tower Block B2: 69.1m(25 storeys: basement, ground floor GF, plus levels L1 to L23).



1.6. Each tower block will be served on all storeys by two firefighting stairs (Stair 1 and Stair 2). Each firefighting stair will be part of a firefighting shaft which also contain: a dual purpose firefighting/evacuation lift (two lifts for Stair 1), a smoke ventilated firefighting lobby, and a wet fire main outlet located at the full landing of the stair.

Consultation

1.7. Section 6 (building schedule) of the *Fire Statement* confirms that the design standards used are: BS9991:2024 ('*Fire safety in the design, management and use of residential buildings – Code of practice*'), BS9999:2017 ('*Fire safety in the design, management and use of buildings – Code of practice*'), and BS7974:2019 ('*Application of fire safety engineering principles to the design of buildings*').

1.8. Section 7 of the *Fire Statement*, states: "*As Block A, Tower A1's top storey height exceeds 100m, Block A would fall outside of the scope of BS 9991. Whilst the guidance principles are still considered appropriate, additional work will be undertaken to determine the suitability of BS 9991 guidance for Block A. A Qualitative Design Review (QDR) is proposed and is currently being developed alongside the wider design team. This QDR reviews the impacts of the increase in height for requirements B1 to B5.*" This is noted. HSE has assessed the application accordingly.

1.9. Following a review of the information provided by the applicant, HSE has identified the following concern:

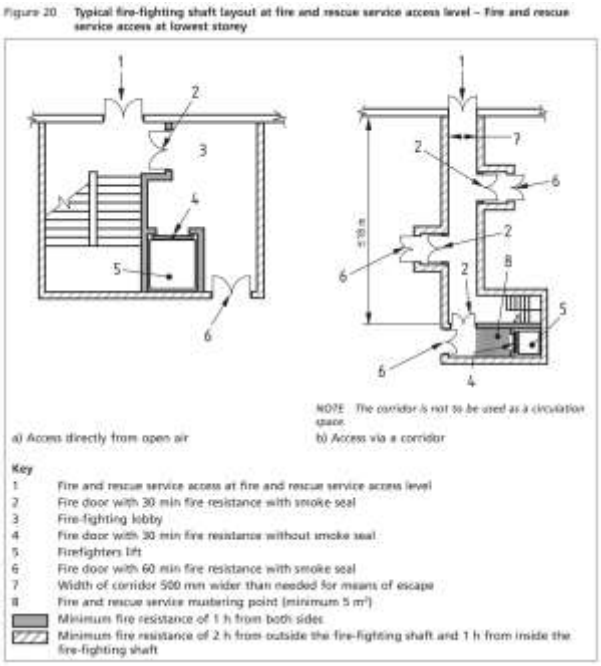
Fire Service Access

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.



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.

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.

Smoke Ventilation - Computational Fluid Dynamic (CFD) modelling

2.1. It is noted that section 7 of the *Fire Statement,* states: "*A full detailed **Computational Fluid Dynamic (CFD)** assessment will be undertaken at RIBA Stage 3 to demonstrate that the stair and evacuation lift lobby remains tenable during the firefighting phase and that the smoke control system does not cause excessive depressurisation within the corridor.*"

2.2. If the CFD analysis does not support the design in the planning application, this may affect land use planning considerations such as the layout and appearance of the development. It will be for the applicant to demonstrate compliance at later regulatory stages.

Green Roof

2.3. The Proposed Roof Plan drawings show the proposed installation of a green roof. The *Design Access Statement* dated December 2025, states: "*The green roof is split into two types, bio-solar, which integrate photovoltaic panels with vegetation, and wildflower roofs that support biodiversity and ecological value*."

2.4. A green roof may constitute a fire hazard as it requires a regular management and maintenance regime, and the external envelope of a building should not provide a medium for undue fire spread. Where a green roof is proposed, sufficient fire resistance to prevent fire spread to any adjoining roofs/wall(s) will be required. It will be for the applicant to demonstrate that the proposed green roof is viable in relation to fire safety at later regulatory stages.

2.5. Guidance for green roofs can be found in *Fire performance of green roofs and walls - GOV.UK (www.gov.uk)*, published by the Department for Communities and Local Government. Where regulation 7(2) applies, that regulation prevails over all the provisions in this paragraph.

Photovoltaic (PV) panels

2.6. The proposed roof plan drawings show that the proposal includes provision of photovoltaic panels. 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.

Hydrants

2.7. Section 13 of the Fire Statement, states: "*The existing hydrants will be surveyed and supplemented with new/additional hydrants as necessary to ensure compliant provision in terms of pressure, flow rate and distance from dry riser inlets and fire service vehicle locations. From the current information available, limited public hydrants are available from the main access roads*."

2.8. It is noted the response to the question on the *Fire Statement*, section 13, about the reliance on the use of existing hydrants and whether they are currently usable / operable is given as: "*no*." In circumstances such as this, the state of the existing hydrants should be checked 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.

Yours sincerely

[redacted]

[redacted]

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**