

Protection by fire engineering design
Prevention by fire safety management
Control by fire attack planning

3rd June 2025

Application Number: 68505

Dear Sir

Town and Country Planning Act 1990

Town and Country Planning (Development Management Procedure) (England) Order 2015

Application Number: 68505 Location: Hollymount Farm, Hollymount Lane, Tottington, Bury, BL8 4HP

General

I have been asked to comment on condition 17 of a “notice of planning permission”; (date of decision 14/12/2022) made under the above legislation, which states:

Prior to first occupation of the development hereby approved, a sprinkler/misting system to meet the requirements of BS 9251:2014 or other subsequent standard that meets the requirements of Greater Manchester Fire and Rescue Service and deemed suitable to overcome the site's emergency access deficiencies, shall be installed in the dwelling hereby approved and shall thereafter be maintained at all times. Reason. In the interests of fire safety and to ensure the safe and satisfactory development of the site and for its future occupiers pursuant to Bury Unitary Development Plan Policies H1/2 - Further Housing Development, H2/2 - The Layout of New Residential Development and EN1/2 - Townscape and Built Design.

I toured the site on Monday 2nd June 2025 and examined site plans.

My Qualifications

Attached is a CV from which the reader will see that I have been involved in fire related matters for over 60 years. It follows from my CV that I am well aware of the hazards a fire can pose to buildings and people and the necessary measures to limit death, injury and property destruction.

Requirements

Building work must meet all relevant requirements of the Building Regulations 2010. To comply with the Building Regulations, it is necessary both to follow the correct procedures and meet technical performance requirements.

Access and facilities for the fire service B5 states:

- (1) The building shall be designed and constructed so as to provide reasonable facilities to assist fire fighters in the protection of life.
- (2) Reasonable provision shall be made within the site of the building to enable fire appliances to gain access to the building.

General Guidance

Approved documents are approved by the Secretary of State and give practical guidance on common building situations about how to meet the requirements of the Building Regulations 2010 for England.

The approved documents set out what, in ordinary circumstances, may be accepted as one way to comply with the Building Regulations. Note, however, that:

- Complying with the guidance in the approved documents does not guarantee that building work complies with the requirements of the regulations – the approved documents cannot cover all circumstances. Those responsible for building work must consider whether following the guidance in the approved documents is likely to meet the requirements in the particular circumstances of their case.
- There may be other ways to comply with the requirements than those described in an approved document. If those responsible for meeting the requirements prefer to meet a requirement in some other way than described in an approved document, they should seek to agree this with the relevant building control body at an early stage.¹

Specific Guidance

Guidance specific to “Access and facilities for the fire service B5” includes:

13.1 For dwellinghouses, access for a pumping appliance should be provided to within 45m of all points inside the dwellinghouse.

I confess I have never understood this arbitrary figure of 45 metres. Most fires in houses are fought by firefighters using high pressure hose reels (or now, an Ultra High Pressure Lance such as those on the Ramsbottom and Bury pumping appliances). Pumping appliances carry two 55 metre long hose reels, one on either side of the vehicle. This length of hose together with a water throw of up to 6 metres means that it would be sufficient for a pumping appliance to be provided with access to within 61 metres of all points inside a dwellinghouse.

However, in this development the recommendation in Approved Document B of access within 45 metres is met.

13.3 Access routes and hardstandings should comply with the guidance in Table 13.1.

Table 13.1 is a diagram that includes the phrase:

Fire and rescue service vehicles should not have to reverse more than 20 metres from the end of an access road.

In this development the recommendation in Approved Document B of not more than 20 metres from the end of an access road is met.

Table 13.1 also gives typical fire and rescue service vehicles access route specification in terms of width of road 3.7 metres; width of gate 3.1 metres and carrying capacity 12.5 tonnes.

In this development the recommendations in Approved Document B are met.

Water supplies

It should be realised that in most circumstances a fire in a house is extinguished using the water carried on pumping appliances. However, although not mentioned in the “notice of planning permission”; I also checked the available water supplies. It is generally accepted that a fire hydrant should be located at 300 metre intervals.

¹ Fire Safety, Approved Document B Volume 1 Dwellings, 2019 edition incorporating 2020, 2022 and 2025 amendments and forthcoming 2026 and 2029 changes – for use in England

There is a fire hydrant situated approximately 85 metres on Hollymount Lane (uphill) from the vehicle entrance to the site and all locations where pumping appliances may park are within 300 metres of that hydrant.

If it is considered that water supplies are insufficient, the requirement to provide additional hydrants is the responsibility of Greater Manchester Fire and Rescue Service.²

Conclusion

In view of the foregoing I do not understand the comment that a sprinkler/misting system needs to be installed "to overcome the site's emergency access deficiencies". As described above, in my opinion there are no deficiencies in the emergency access arrangements.

I hope the above is sufficient for your needs if you require anything further please do not hesitate to get in touch.

Yours sincerely

A handwritten signature in purple ink, appearing to read 'Dennett', with a large, sweeping initial stroke.

Michael Dennett

² Fire and Rescue Services Act 2004; Section 38: Duty to secure water supply etc

(1) A fire and rescue authority must take all reasonable measures for securing that an adequate supply of water will be available for the authority's use in the event of fire.