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Fire Safety Engineering Forensic Fire Investigation Expert Witness

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

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26th August 2025

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Application Number: 68505

Dear Ms Townsend

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

1. 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. I toured the site again on 20th August 2025 and the other developments beyond the current development.

2. My Qualifications

I attached a CV to the letter dated 3rd June 2025. I commented that the reader would see that I have been involved in fire related matters for over 60 years. Since writing that earlier letter I have checked on the number of fatal incidents I attended during my 30 years in the fire service.

Accredited as an expert witness by:
the Law Society, the Law Society of Scotland and the UK Register of Expert Witnesses

As a specialist fire investigation officer in Manchester City and Greater Manchester on average I attended 20 fatal fires per year in buildings. Most were single fatalities but some were multiple three, four, five or my highest, six. So in 12 years I attended more than 240 calls to fire deaths in buildings.

I also attended many fatal fire incidents in vehicles again three, four, five or my highest, six.

As the Divisional Commander of C Division (Oldham, Rochdale and Bury) in Greater Manchester and as the Assistant Chief Fire Officer (Operations) in West Yorkshire, I continued to attend some investigations in property and vehicles where there were multiple fatalities.

I have also investigated other fire fatalities based on site visits and/or evidence collected:

Garley Building Kowloon, Hong Kong 20th November 1996 – 40 fatalities

Gorteen House Hotel, Limavady, Northern Ireland on 1st November 2003 – 1 firefighter fatality

Marlie Farm, The Broyle (B2192), Ringmer, Lewes, East Sussex on 3rd December 2006 – 2 fatalities (1 firefighter and 1 non-uniformed FRS)

Wealmoor (Atherstone) Ltd, Atherstone Industrial Estate, Atherstone on Stour, Warwickshire on 2nd November 2007 – 4 firefighter fatalities

Lakanal House, Camberwell, London on 3rd July 2009 – 6 fatalities

Balmoral Bar Edinburgh 11th July 2009 – 1 firefighter fatality

Maes y Groes Prestatyn 19th October 2012 – 5 fatalities

Grenfell Tower, London, 14th June 2017 – 71 fatalities

It follows from my CV and the above 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.

In addition to the above, I was an enforcing officer for fire safety legislation starting with the fire provisions of the Factories Act 1961; then the Offices, Shops and Railway Premises Act 1963 and finally the Fire Precautions Act 1971.

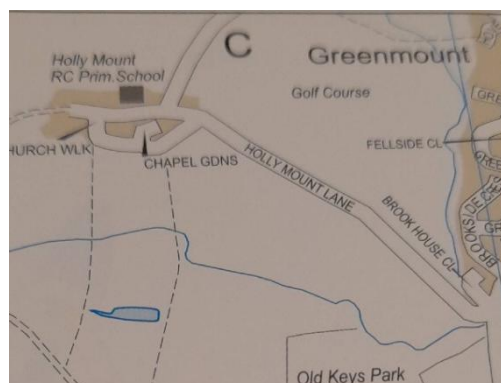
All three of those Acts gave the inspecting officer the power to make requirements, however all three contained a caveat, "as may be **reasonable in the circumstances of the case**".

Since retiring from the fire Service I have undertaken many fire safety strategies, means of escape plans, firefighting access and fire attack plans for complex buildings and a large urban development - Liverpool 1.

Although both as a fire officer and a fire consultant I have met many Building Regulations inspectors and have attended "determination hearings" at the DoE; I confess I have never before had dealings with a Town and Country Planning Officer.

3. The development site

Five domestic properties are to be built on Holly Mount Lane (off Holcombe Road).



Map from Bury Official Guide and street plans

The location of the development is approximately 250m up Holly Mount Lane from the car park at its junction with Holcombe Road.



Holly Mount Lane

Access to all of the properties in this area is off Holcombe Road where there is a sign which states "Two-way traffic is possible with care".



There are several houses on Holly Mount Lane beyond the current development and at the top of Holly Mount Lane is a three storey building - Holly Mount R.C. Primary School.



Holly Mount R.C. Primary School

To the side and behind Holly Mount R.C. Primary School is a modern housing estate of more than 20 dwellings.

Whipney Lane forms a junction with Holly Mount Lane. On Whipney Lane is a single storey nursery with a timber extension. At the end of Whipney Lane are Greenmount Golf Club and more dwellings. The golf club-house and two large storage buildings are all constructed of timber.



Greenmount Golf Club

4. Greater Manchester Fire and Rescue Service

Shelley Greateorex of Greater Manchester Fire and Rescue Service completed a report reference PR 1032932. There are no details in the report about whether Ms Greateorex is an administrator or a fire officer or what training, qualifications and experience she has.

Her report includes:

“I have considered the above development which does not meet the access requirements for the fire and rescue service. There is only one access road into the site, effectively creating a cul-de-sac of approximately 280m. This is more than the recommended maximum cul-de-sac length of 250m. Any obstruction along the single access road could severely impact, or prevent, Greater Manchester Fire and Rescue Service (GMFRS) appliances from accessing the site within reasonable timescales, increase attendance time and pose a risk to public life.”

There are no references in the report so I am unaware from where Ms Greateorex got the 250m standard but it should be noted that she states it is a recommended distance i.e. not mandatory. It also unclear why she considers the cul-de-sac is approximately 280m long when the distance from Holcombe Road to Greenmount Golf Club is approximately ¾ of a mile.

“The above proposal should also meet the following requirements for Fire Service access: • The Fire Service requires vehicular access for a fire appliance to within 45m of all points within the dwellings • The access road should be a minimum width of 3.7m between kerbs and capable of carrying 12.5 tonnes. Additionally, as the access road is more than 20m long a turning circle, hammerhead, or other turning point for fire appliances will be required.”

All roadways within the development comply with the standards recommended in Approved Document B.

“On this site private fire hydrants are located on private water mains that are not the responsibility of the local water company or the fire and rescue service.”

There are no private water mains within the development. There is a fire hydrant situated on Holly Mount Lane approximately 85 metres (uphill) from the vehicle entrance to the development.

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.¹

“Where access deficiencies exist the most appropriate mitigating measure would be to ensure a second access into the site. If this is not achievable then GMFRS would recommend the installation of domestic sprinklers as this would allow for the length of the single access road to be extended to 500m.”

Again, there are no references in the report so I am unaware where Ms Greateorex got the recommendation that sprinklers are appropriate compensation for a cul-de-sac longer than 250m. In any case, as noted earlier, all roadways within the development comply with the standards recommended in Approved Document B.

The Greater Manchester Fire and Rescue Service website includes a reference to sprinkler systems.²

The legal position

Some property owners are required by law to install sprinkler systems. These include:

- New residential blocks over 30m high
- Uncompartmented areas of shops or self storage buildings with an open-plan area over 2000m²

¹ 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.

² What you need to know about sprinklers - Greater Manchester Fire Rescue Service

There is no mention in the Greater Manchester Fire and Rescue Service website about sprinklers being appropriate compensation “for access deficiencies” and as outlined earlier; there are no “access deficiencies” in this development.

In addition I am not aware of any of the buildings noted in “3. The development site”; which are all significantly further away from Holcombe Road, having automatic sprinkler systems installed.

5. Building Regulations

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.

6. Recommendations in Approved Document B

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.³

7. 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.

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

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

13.4 Dead-end access routes longer than 20m require turning facilities, as in Diagram 13.1. Turning facilities should comply with the guidance in Table 13.1.

³ 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

Table 13.1 Typical fire and rescue service vehicle access route specification						
Appliance Type	Minimum width of road between kerbs (m)	Minimum width of gateways (m)	Minimum turning circle between kerbs (m)	Minimum turning circle between walls (m)	Minimum clearance height (m)	Minimum carrying capacity (tonnes)
Pump	3.7	3.1	16.8	19.2	3.7	12.5

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

8. Bury Council Development Control

Within the “notice of planning permission”; was a section entitled “The following policies of the Bury Unitary Development Plan, National and Regional Government were considered relevant”:

“This decision relates only to the Town and Country Planning Acts and does not include any consent or approval under any other enactment or under the Building Regulations. Any other consent or approval which is necessary must be obtained from the appropriate authority.”

Access for firefighting is clearly a function of Building Regulations not Town and Country Planning Act 1990, or Town and Country Planning (Development Management Procedure) (England) Order 2015. The Building Inspector for this development has stated:

“We did not consult the fire service as there did not appear to be any issues from an access point of view based on the plans provided therefore a consultation was not necessary.”

9. 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 and that of the Building Inspector, there are no deficiencies in the emergency access arrangements.

I am sorry the Planning Officer refused a request to meet to discuss this matter but I hope the above is sufficient for your needs if you require anything further please do not hesitate to get in touch.

Yours sincerely



Michael Dennett