

Page No	Para Ref	Comments
General Introduction		
9	0.6	Consider referring to the other Approved Document
9	0.7	Are the HMO's covered by DOE Circular 12/92 not Purpose group 2(b) and consequently should reference be made to the 'Other than Dwellings' document?
10	0.9	Does the adult placement code satisfy the Building Regulations or Part B?
12	0.23 2 nd Sent.	Delete the word 'persons'
12	0.22 3 rd Para	Consider 'emergency egress windows' in lieu of 'escape windows'
12	0.24 Last Para	Does the scope of BS5588 – 12 include dwellings? Perhaps it does for large apartment buildings.
14	B1.iv	Insert '& Rescue' between 'fire' and 'authority'
14	B1.v	Delete '(where appropriate)' - Fire alarms always appropriate in dwellings.
15	B1.x and xi	Consider revisiting this general information with a view to relating it more specifically to dwellings.
Section 1 Fire alarm and fire detection systems		
18	General	Consider 'dwellinghouses' rather the 'houses' as this is the defined term
18	1.3	Grade 'D' relates to standby supply. Is it necessary to refer to Part 1 when Part 6 is specifically for dwellings?
18	1.4 3 rd Para	Consider 'smoke alarms' in lieu of 'detectors'.
18	1.8	Case for consideration. The new rooms require adequate warning. In order to provide this additional smoke alarms are required in the existing parts to act as 'detectors'? For example, should a heat alarm not be provided in an existing Kitchen in order to detect a fire as quickly as would be the case with a new system in a new dwelling
19	1.11	Insert 'Principal habitable room' in lieu of 'main living room'. This has a knock on effect on Para 1.12 and 1.13 as the new proposals will always result in more than 1 alarm. Suggest that 1.13 also refers to linking with heat alarms
19	1.14	Add 'and heat alarms' to lead in sentence. Are the existing references to heat detectors necessary as the general guidance relates to alarms as indicated in the main title?
19	1.15 and 1.16	Add guidance regarding the location of heat alarms – ie not above a cooker.
Section 2 Dwellinghouses		
22	2.4 Note	Reconsider wording.
23	2.9 b	Clarify intent. Does the proposal mean that in a two storey dwellinghouse emergency egress windows are not needed if a protected stairway is provided? 'b' relates to a provision to each room - perhaps 'access to' should be added to read 'b. access to a protected stairway'
23	2.11	Is more guidance on the use of locks needed to address the issue of keys? Clash between insurance and safety.

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24	2.15 b	The proposal regarding the sprinkler option is misleading in the middle of the alternative escape route provisions
25	2.20 3 RD Para	Use 'emergency egress window' in lieu of 'escape window'.
Section 3 Apartments		
27	3.5	See 0.7. Consider qualifying which HMO's are covered.
28	3.15	Change 'two' to 'three' to introduce the three approaches
31	3.24	Insert 'apartment' in lieu of 'dwelling' (first para and note) In ai. consider giving the definition of 'equivalent free air' even though it is in another AD. In aii. clarify that the 0.75m relates to any side.
32	3.26	Give the lead in paragraph a new reference number. Second last paragraph. Is the vent manually openable?
34	3.48, 3.49 and 3.50	These paragraphs relate to all dwellings and not just apartments. Consider a new location. Check the new provisions of 3.50 against the footnotes to Table D1 and the uses that are deemed to be within the dwelling purpose group.
Section 4 General Provisions		
37	4.18 (a)	Delete the reference to purpose groups as the provision only related to Apartment buildings
39	4.35 a	Add the word 'building' after apartments. A maisonette could be a 2 storey apartment.
40	4.42	Change 'fire risk' to 'fire hazard'.
Section 5 Wall and ceiling linings		
44	Table 3	Insert apartments in lieu of 'flats' and 'maisonettes'
44	5.3c	Consider the underside of a 'Gallery rather than a 'mezzanine'.
Section 8 Concealed spaces		
61	General	Change main header to 'Concealed spaces'
61	8.3	Write provision specifically for dwellings and not all purpose groups
Section 12 Space Separation		
72	12.2c	Delete purpose groups that are not relevant
73	12.11	Delete reference to 'controlled hazard' and 'petrol pumps'. Would a patio be more appropriate as an example of a limited risk?
75	Table 7 Note c	It appears that the new note c is intended to clarify that the area of the actual rectangle that encloses the unprotected areas should be used in the calculation and not the overall area of the elevation? When this is applied to a simple situation it seems to be very onerous compared to the other methods. Using the smallest rectangle is compatible with Appendix A to BR187 but on the example that I tested I got different answers (see attached file 'Draft Approved Document B Calcs') I may well be wrong but there appears to be a problem with the impact that the proposed note has on the values given in the table

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Section 15 Vehicle access		
83	15.3	Change 'dwelling' to 'apartment'
84	Dia 39	If the existing dimensions are to be retained in the diagram should the Note not be similar to Note 1 to Table 10. The proposed note seems to override the data on the diagram. From the comments we received the ground loading capacity is going to be difficult for Building Control to verify. Insert 'and rescue' between 'Fire' and 'Authority'.
Section 16 Access to building for fire-fighting personnel		
87	16.11	In lieu of 'without the use of a ladder' consider 'The manual operating mechanism should be readily accessible'
Appendix A		
95	Table A1	In Items 3 and 14 change 'flats' or 'maisonettes' to apartments
98	Table A2 Notes	Change 'flats' and 'maisonettes' to apartments # There are no relevant periods above 90 + No relevant periods below 30
Appendix B		
106	2	Does the exclusion relate to any 'final' exit door from an apartment that leads to a common escape route?
109	Table B1 Item 10	Change 'fire risk' to 'fire hazard'
Appendix D		
111	3 b & c	These sub paragraphs do not appear to be relevant to dwellings
Appendix E		
113	Definition	Add definition of 'Heat alarm' Delete examples in definition of 'place of special fire hazard' that are not relevant ¹

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