

## BCSF COLLECTIVE RESPONSE TO CONSULTATION ON APPROVED DOCUMENT B – SUMMARY OF MAIN POINTS

### A Introduction

- This collective response is based on the returns from the following six stakeholders:
  - Association of British Insurers (ABI);
  - Chartered Institute of Housing (CIH);
  - Disability Right Commission (DRC);
  - Federation of Small Businesses (FSB);
  - Fire Industry Confederation (FIC);
  - Royal Society for Prevention of Accidents (RoSPA)
  
- Given the approach adopted below, the complexity of some issues, and the large volume of material covered, tacit consent is assumed:
  - from those stakeholders, who have not submitted responses;
  - where the above six stakeholders have not commented on specific questions

### B Comments

- Overall, the BCSF supports the content and format of ODPM Building Division’s proposals for revising Approved Document B with the following qualifications, which are reflected in individual member organisations’ submissions:
  - **Question 2.1** - FSB have reservations about developing an additional or expanded section to consolidate existing provisions on fixed fire fighting equipment;
  - **Questions 3.7 & 13.6** - FSB have reservations about extending the provision of information on fire safety in all buildings to material alterations and extensions, as some small businesses may not understand what is meant by “material alteration”;
  - **Questions 3.8, 3.9, 13.7 & 13.8** - FSB also have doubts about the enforceability of the above proposal and are concerned that costs are not prohibitive for small and medium-sized businesses;
  - **Question 4.9** – CIH welcomes the use of the word “apartment”, provided the text and/or context make clear whether the building has one or more storeys. FSB would prefer to retain the terms “flats” and “maisonettes”

- **Question 4.11** - FSB have reservations about the proposed revised guidance on natural ventilation for common escape routes;
- **Question 4.12** - RoSPA have concerns about the proposed revised guidance using pressure differentials to control smoke for common escape routes from apartments;
- **Question 5.1 & 15.1** - ABI thinks that the definition of “mezzanine” needs to be clarified, and distinguished from that for “gallery”, before they can comment on the helpfulness of the extended definition of “ceiling”;
- **Questions 6.2 & 6.3** - FSB would prefer that some of the proposals on compartmentation and cavities in dwellings to counter the spread of fire cover only new builds;
- **Question 6.4** - FIC would prefer fixed fire suppression systems in car parks;
- **Question 7.2** - Opinion is split on whether space separation proposals for dwellings should cover only premises belonging to different owners; ABI argues in favour, whilst RoSPA and FIC argue against;
- **Questions 8.3 & 18.4** – CIH think that it would be more effective to cross reference and signpost information on the design and construction of fire fighting shafts rather than try to squeeze this into the main text; DRC would like to retain the requirement for fire fighting shafts in Building Group 5;
- **Question 10.1** - Opinion is split on removing the requirement for self-closing doors in dwellings; RoSPA and CIH fear that weakening this requirement could facilitate the spread of fire, and believe that evidence and specification about how they work should be reviewed and improved, where necessary. FIC thinks that this can be an option, whilst ABI and DRC welcome this suggestion, with the former believing that occupants often prop open or remove self-closing doors, thus undermining their rationale;
- **Question 13.2** - ABI argues in favour of removing all guidance on school fire safety to BB100, whilst FIC argues against;
- **Question 13.4** - FSB would prefer that advice on managing fire safety in workplaces would apply only to premises employing more than five staff;
- **Questions 14.2 & 14.15** - FSB would prefer that:
  - the proposed additional guidance on warning for people with impaired hearing;
  - suggested use of fire fighter lifts for evacuating disabled persons;

in premises other than dwellings, cover only new builds;

- **Question 14.8** - Opinion is split on whether to introduce guidance for providing protected corridors in storage buildings; FIC wishes to strengthen this by adding fire detection and suppression systems, but ABI is concerned that guidance would reinforce the “rabbit-warren” effect of similar looking corridors, so endangering occupants’ escape;
- **Question 14.12** - FSB has reservations about introducing sprinkler protection into employment premises, which are materially altered, or the use of which are changed, as some small businesses may not understand what is meant by “material alteration”;
- **Question 14.13** - ABI believes that sprinkler protection should apply to all care homes to ensure that those, whose mobility and/or cognition is impaired, are protected along with everyone else;
- **Question 14.19** - ABI are concerned that proposed guidance on level thresholds for final exits may compromise flood protection, whilst DRC believe that a reference to Part M of the Building Regulations on contrast colour, would make them more apparent to users;
- **Question 14.20** - ABI are concerned that the proposed guidance on mechanical ventilation and air conditioning systems may conflict with the letter and/or spirit of Part F (Ventilation) and/or Part L (Conservation of Fuel and Power) of the Building Regulations;
- **Questions 16.1 & 16.2** - ABI and FIC strongly disagree with proposals to:
  - increase the maximum size of single-storey shops’ compartments to 4k square metres;
  - introduce a national maximum compartment size for single-storey storage buildings of 440k cubic metres, which would involve repealing the variety of considerably lesser maximum sizes prescribed under several Local Acts,as they fear that fire safety would be compromised if the current system of checks and balances were weakened
  - Both bodies strongly recommend the introduction of sprinklers and other fire suppression systems as an alternative strategy;
- **Question 16.4** - ABI sees no benefit from what they saw as only a change of wording on Section 8 on cavity barriers in buildings other than dwellings;
- **Question 16.8** – FIC considers that there was a considerably higher probability of fire spreading between car park storeys, which the compulsory installation of sprinklers would combat. FIC also suggests how s10.2 could be reworded;

- **Question 25.1** – FSB has reservations about five years being the frequency with which Part B was reviewed and updated.
  
- Stakeholders particularly welcome:
  - **Questions 3.9** - Including fire safety advice in Home Information Packs, with DRC suggesting some additional wording and guidance to facilitate the means of escape for disabled persons;
  - **Questions 4.1 & 4.3** - Proposals on Fire Alarm and Detection Systems in dwellings, and suggested various additions, like mains smoke alarms and additional fire suppression / protection systems, particularly as back-ups, since there are times when battery alarms failed to work;
  - **Questions 6.1, 14.10 & 14.11** - Sprinkler protection and other fire suppression systems into buildings above 30m tall and residential care homes;
  - **Questions 3.4 & 13.3** - The Inclusive Design approach in buildings other than dwellings, with FIC and DRC suggesting some additional wording;
  - **Question 13.4** - Proposed advice on managing fire safety in premises other than dwellings – although please see FIC’s earlier qualification;
  - **Question 14.2** - Proposed additional guidance on warning for people with impaired hearing in premises other than dwellings - although please see FSB’s earlier qualification.
  
- You may wish to know that, when discussing Approved Document B at recent meetings, BCSF stakeholders noted that:
  - all the information on fire safety for every disability plus corresponding options and arrangements, needed to be pulled together;
  - a simple single-sheet matrix, encompassing every disability plus corresponding options and arrangements would probably be the most suitable format;
  - the Fire and Rescue Service Directorate currently had the funds to employ someone with sufficient expertise to draw together by 31 March 2006, to pull together all the relevant elements guidance into one interim consolidated document, which could thereafter be circulated widely for consultation, and could thereafter be updated in the light of further research by Building Division.