Response form for the consultation on proposals for amending Approved Document Associated with Building Regulations Part B – Fire safety

Respondent Details Name: Organisation: Address: Town/City: County/Postcode: Fax: E-mail:	at c	Nease return by XX/XX/X XXXXXXXXXX Building Division ODPM	XXX 10 :
Organisation type (tick one box of	only)		
Approved Inspector		Manufacturer	
Architects		Other non-governmental organisation	
Civil/Structural Engineer		Private individual (unaffiliated)	
Commercial Developers		Professional body or institution	
Consultancy Fire & Rescue Authority		Property funder	
House or property developer		Property Management (Facility Manager)	
Housing Association (Registered Social Landlords)		Property Manager (Energy Manager)	
Individual in practice, trade or profession		Research/academic organisation	
Journal/media		Specific interest or lobby group	
Local authority – Building Control		Testing bodies	
Local authority – Environmental		Trade body or association	
health		Insurer	
Local authority – other (please specify)		Other:	
Please use a √or X in answering the fo	ollowing que	estions	
Is your response confidential?	Yes	No	

<u>Foreword:</u> It is appreciated that not all consultees will wish to express an opinion on every question. Where no response is given it will be presumed that consultees do not wish to contribute to the consultation on that specific matter. Where consultees strongly support particular aspects of the guidance please use the comments sections of this form to note that support.

Please note that provision is made throughout this questionnaire for you to provide additional comments. If, however you wish to provide detailed comments on any aspect of the consultation then please append additional materials and supplementary documents, clearly marked and cross referenced to the relevant questions, as necessary.

	ine r	ormat of the Approved Document (AD B)							
	1.1	Do you support the two volume format (Dwellings & Buildings other than dwellings) of the proposed AD B?							
	10-102		Yes		No				
	1.2	If you answered No to 1.1 do you prefer the format of the existing AD B i.e. a single volume?	Yes		No	П			
	1.3	Do you think that the format of the AD B could be improved by creating three volumes where the third volume contains the technical appendices for the "Dwellings" & "Buildings other than Dwellings" volumes thereby reducing duplication and the overall size of the volumes?							
			Yes		No				
Com	ment								
		If you would prefer a different format please state what this would be and explain why it would be an improvement.					83		
2	Addi	tional sections within the AD B							
_	Addi	donal sections within the AD D							
	2.1	It has been suggested that either an additional functional requirement (i.e. B6 or perhaps B3(5)) could be developed to consolidate existing provisions on fixed fire fighting equipment such as sprinklers. Would this be beneficial to future editions of the AD B?							
<u> </u>			Yes		No				
Com	omments:								

Questions on technical guidance within the AD B Volume 1 (Dwellings)

3	Intro	duction to the Guidance		
C	3.1 ommer	Does the introduction text clearly and adequately describe its purpose and context? hts:	Yes	No
	3.2	Adult Placement Do you support the reference to Adult Placement Schemes? (para 0.9)	Yes	No
U	ommer	nts:		
Co	3.3 ommer	Residential Sprinklers Do you support the new general guidance on residential sprinkler systems? (para 0.21) Residential sprinklers are also mentioned in paragraphs 2.14, 3.15, 7.16, 12.16 and 16.5	Yes	No 🗀
		8		
Co	<i>3.4</i> ommer	Inclusive Design Do you support the guidance on Inclusive Design? (para 0.24) hts:	Yes	No

Co	<i>4.2</i> mmen	Material alterations Do you support the proposed guidance on Material Alterations? (para1.8) ts:	Yes	No	
4 Co	B1 <i>4.1</i> mmen	Means of Warning and Escape Section1 Fire Alarm And Fire Detection Systems Do you support the general amendments of Section 1 to align with BS 5839 part 6? ts:	Yes	No	
Co	mmen	ts:			
	3.9	Do you think there would be a cost involved?	Yes Yes	No No	
	3.8	Do you think this proposal is enforceable?	Yes	No	
	3.7	Should these proposals cover material alterations and extensions?			
	3.6	Should the proposals for a new Regulation requiring provision of information for "Buildings other than Dwellings"?	Yes	No No	
	3.5	Provision of information Do you support the proposals for guidance on the provision of information set out in the General Introduction?	Yes	No	

4.3	Do you support the proposals for providing an additional smoke alarm in the principal bedroom? (para1.3 & 1.11)	Yes	No	
4.4 Comment	Section2 Dwellinghouses Inner rooms Do you support the proposed note in the guidance for "inner inner rooms"? (para2.3) ts:	Yes	No	
4.5 Comment	Galleries Do you support the proposed guidance on galleries? (para2.6) ts:	Yes	No	
4.6	Emergency egress windows Do you support the proposed guidance on locks and stays for emergency egress windows (para2.10 Note)	Yes	No	

4.7 Commen	Do you support the replacement of the existing guidance on loft conversions with proposed new guidance aligning such building work to the formation of a three storey house? (para2.18a) ts:	Yes	No 🔲	
4.8 Commen	Replacement Windows Do you support the proposed guidance on replacement windows? (para 2.19) Its:	Yes 🗔	No	•
<i>4.9</i> Commen	Section3 Apartments Terminology Do you support replacing the term flats and maisonettes with the more commonly used term "apartment"? ts:	Yes	No	ÎI N
4.10 Commen	the internal planning of apartments with more than one storey? (para 3.15 c & d)	Yes	No 🔲	

<u> </u>	4.11	Do you support the proposed guidance on natural ventilation for common escape routes? (para 3.25)	Yes		No	
Co	mmen	ts:				
Co	<i>4.</i> 12 mmen	Do you support the proposed guidance on smoke control for common escape routes using pressure differentials? (para 3.26)	Yes		No	
•	4.13	Live/work units - Do you support the proposed new guidance on live work units? (para3.51)	Yes		No	
Co	mmen	ts:				
5	B2	Internal Fire Spread (Linings)	ij			
	5.1	Section 5 wall and ceiling linings Do you support the extended definition of ceilings helpful? (para 5.3c&d)	Yes		No	
Со	mmen	ts:	100	<u></u>	110	
6	В3	Internal Fire Spread (Structure)				
	6.1	Section 7 compartmentation ODPM is minded to introduce sprinkler protection in apartment buildings over 30m tall? (Para 7.16)Would you support the proposal	Yes		No	
Co	mmen	ts:	10417670		10013578V	

Co	6.2 mmen	Do you support the new guidance on accommodating the predicted deflection of floors above compartment walls? (para 7.23)	Yes	No	
Co	6.3 mmen	Section 8 concealed spaces (cavities) Do you support the proposals for revised text on cavity barriers in Dwellings?(paras 8.1 – 8.8) Its:	Yes 🗌	No	(
Co	6. <i>4</i> mmen	Section 10 special provisions for car parks Do you support the proposals for car parks?(paras 10.1 – 10.4) hts:	Yes	No	
7 Co	B4 7.1 7.2 mmen	External Fire Spread Section 12 space separation Do you support the proposed changes to the guidance on notional boundaries? (12.6) Should these provisions only apply to premises in different ownership? (12.6)	Yes	No No	
Co	7.3 mmen	Section 13 roof coverings Are you satisfied with the proposals for amending para 13.5 and Table 6 for roofing? ts:	Yes	No	

8	B 5	Access And Facilities For The Fire Service		
	8.1	Section 14 fire mains and hydrants Do you support the new proposals for private hydrants? (para 14.7)	Yes 🗌	No 🗔
Co	mmen	ts:		
Cor	8.2 mmen	Section 15 vehicle access Do you support the proposals for amending the guidance on Buildings not fitted with fire mains? (paras 15.2/15.3) ts:	Yes	No 🗌
		Section 16 access to buildings for fire-fighting personnel		
	8.3	Do you support the proposals for amending the guidance on number and location of firefighting shafts? (paras 16.5/16.6)	Yes 🔲	No 🗌
Co	mmen	ts:		
	8.4	Do you support the proposals for amending the guidance on design and construction of firefighting shafts? (paras 16.7-16.9)	Yes 🗌	No. 🗆
Co	mmen	ts:	165	No 📋
	8.5	Your views would be welcomed on what, if any, sections of BS 5588-5:2004, Fire precautions in the design, construction and use of buildings. Access and facilities for fire-fighting, should be referred to (paras 16.7-16.9)		
Co	mman	te.		

Cor	8.6 nment	basements Do you think the guidance in section 17 "venting of heat and smoke from basements" should be changed as a result of the findings of the ODPM report "Firefighting in under-ventilated compartments"?(para 17.1)	Yes	No	
9	9.1	Appendix A: Performance of materials products and structures This appendix has been amended to take account of the new European classification system for roofing. Do you support the proposed changes?(para 6)	Yes	No	(
Cor	nment	s:			
10 Cor	10.1 mment	Appendix B: Fire doors Do you support the proposals to remove door closers within dwellings? (para 2)	Yes	No	•
11 Com	11.1	Appendix E: Definitions This appendix Includes a number of new or amended definitions. Do you support the proposed changes?	Yes	No	

12 Any other issues

12.1 Are there any other issues regarding the AD B volume 1 "Dwellings" that you would like to raise?

Questions on technical guidance within the AD B Volume 2 (Buildings other than

Dwe	ellings)				
13	Introd	uction to the Guidance			
	13.1	Does the text of the introduction clearly and adequately describe its purpose and context?	Yes 🗀	No	
Cor	nments	:			
Cor	13.2 mments	Schools Are you satisfied with the proposal to remove all guidance on fire safety in schools and refer to the new Building Bulletin 100 instead? (para 0.21)	Yes	No	
Cor	13.3 nments	Inclusive Design Do you support the proposed new guidance on inclusive design? (para 0.27) Further new guidance addressing the needs of disabled people is proposed in paragraphs B1.ix, 1.9, 3.1, 3.6, 3.14, 4.33 & 4.38	Yes	No	
	13.4	Management Do you support the proposed advice on the management of fire safety in premises (para 0.28)	Yes 🗀	No	·

100	Provision of information			
13.5	Do you support the proposals for a new Regulation, for the provision of information set out in the General Introduction? (para 0.29)			
		Yes	No	
13.6	Should these proposals cover material alterations?			
		Yes	No	
13.7	Do you think this proposal is enforceable? If no please give reasons in the comments box.			
		Yes	No	
13.8	Do you think there would be a cost involved? If so please give details in the comments box.			
	product grown and comments.	Yes	No	
Commonte		rocenses (Samuel		

Alternative approaches

At the time of preparing this consultation document
British Standard Draft for Development (DD) 9999 had
not been published. However, should this document
become available during the consultation period on
this Approved Document we would welcome
consultees' thoughts on the adequacy of DD 9999 to
meet the functional requirements of Part B of the
Building Regulations and as a replacement to the
5588 series of standards.(Para 0.15)

14	B1	Means of Warning and Escape				
Con	14.1 nments	Section 1 Fire alarm and fire detection systems Do you support the general amendments of Section 1 to align with BS 5839 part 1?	Yes] No		
Con	14.2 nments	Do you support the proposed additional guidance on warnings for people with impaired hearing?	Yes] No		(
Con	14.3 nments	Section 2 Design for horizontal escape Do you support the proposed guidance on access control measures? (para 2.6)	Yes	No		
Con	14.4 nments	With the imminent removal of the relevant "Home Office" guides do you support the proposed text in table 2 on the classification of normal or higher hazard premises? (Table 2 Note 6)	Yes	No		
Con	14.5 nments	Do you support deletion of the "2½ degree rule" in Diagram 2?	Yes 🗌	No	World and	

14.6 Comments	Do you support the proposed new guidance on means of escape in buildings with open spatial planning? (para 2.12)	Yes	No 🗌
14.7 Comments	Do you support the proposed new guidance on calculating the minimum width of ground floor storey exits? (para 2.23)	Yes	No 🔲
14.8 Comments	ODPM is minded to introduce guidance for the provision of protected corridors in storage buildings. This is intended to address safety concerns relating to self storage type premises. Do you support this proposal?	Yes	No 🗀
14.9 Comments	Do you agree that additional measures are necessary in this type of premises?	Yes	No 🔲
14.10 Comments	Do you support the proposed new guidance on progressive horizontal evacuation in residential care homes (paras 2.32 to 2.43)	Yes	No

14.11 Comments	ODPM is minded to introduce a provision for the use of sprinkler protection in care homes. Do you support this proposal? (para 2.36)	Yes	No		
14.12 Comments	Do you think that the need for sprinkler protection should only apply to care homes designed using progressive horizontal evacuation?	Yes	No		
	Section 3 Design for vertical escape				
14.13	Do you support the proposed guidance on the provision of refuges (para 3.6 – 3.13)	Yes 🗌	No	П	
Comments	:				
14.14 Comments	Do you support the suggestion that firefighting lifts can be used for the evacuation of disabled people? (para 3.14)	Yes	No		(
				*	
14.15	Do you agree with the proposed change to the guidance on discounting of stairs for tall buildings designed for phased evacuation? (para 3.21)	Yes	No		
Comments			v=90===V		

	nments	guidance on phased evacuation where, in the first instance, only the fire floor is evacuated? (para 3.27)	Yes	No 🗀
		Section 4 General provisions		
	14.17	Do you support the proposed additional guidance on the provision of door fastenings? (para 4.11)	Yes 🗌	No 🗔
Con	nments	:		
9	14.18	Do you support the proposed guidance on level thresholds for final exits? (para 4.33)	Yes 🗌	No 🗔
Con	nments	:		1
	14.19 n ments	Do you support the proposed additional guidance on the provision on mechanical ventilation and air conditioning systems? (para 4.46 – 4.50)	Yes	No 🔲
15	B2	Internal Fire Spread (Linings)		
	15.1	Section 5 wall and ceiling linings Is the extended definition of ceilings helpful? (para 5.3c&d)	ΥΠ	NΠ
Com	ments		721	

16	В3	Internal Fire Spread Structure Section 6 Compartmentation			
	16.1	It has been suggested that the 2000m ² compartment size for single storey shops adopted in the 2000 edition of the AD B is too onerous and could be increased to 4000m ² . Are you in favour of this relaxation? (Table 11)	Yes	No	
Com	ıments	:			
	16.2	It is proposed to introduce a national maximum compartment size for single storey storage buildings of 440,000m3 coupled with the repeal of similar provisions in local Acts (typically set at			
Com	ments	7000m3). Do you support this proposal? (Table 11)	Yes	No	
Com		Do you support the new guidance on accommodating the predicted deflection of floors above compartment walls? (para 7.24)	Yes	No	
		Section 8 concealed spaces (cavities)			
	16.4	Do you find the rewritten section on cavity barriers an improvement?	Yes 🗌	No	
Com	ments	:	.00	110	

16.5 Comments	Changes to the guidance within Section 8 mean that cavity barriers will be necessary in underfloor service voids. Do you support this change? (Para 8.7 / Table 12)	Yes	No	
16.6 Comments	Changes to the guidance within Section 8 mean that window and door frames with a low melting point will no longer be considered as an adequate alternative to a cavity barrierDo you support this change? (Para 8.12)	Yes	No	
16.7	Section 9 protection of openings and firestopping Do you agree with the additional guidance on ventilating ducts and fire dampers? (para 9.10 to 9.16)	g Yes	No	
Comments		103	NO	
	Section 10 special provisions for car parks and shopping complexes			
16.8	Do you agree with the proposed changes to the guidance on car parks? (para 10.3)	Yes	No	
Comments	<u>:</u>			

17	B4	External Fire Spread			
		Section 12 Space separation			
	17.1	Do you support the proposed changes to the guidance on notional boundaries? (12.6)	Yes 🗌	No.	
Со	mmen	ts:	165	No []	
		Santian 12 years accoming			4
	17.2	Section 13 roof coverings Are you satisfied with the proposals for amending Para 13.5 and Table 15 for roofing?	Yes 🗌	No.	•
Co	mmen	ts:	165	No	
18	B5	Access and facilities for the fire service			
	18.1	Do you support the proposed additional guidance for buildings where the means of escape has not been designed in accordance with the approved document? (para B5.ii b)	Yes 🗔	No. [82
Ço	mmen	ts:	res	No 📋	(
	18.2	Section 14 fire mains and hydrants Do you support the new proposals for private hydrants? (para 14.7)	· -		
Co	mmen	ts:	Yes	No	

Com	<i>18.3</i> nment	Section 15 vehicle access Do you support the proposals for amending the guidance on Buildings not fitted with fire mains? (paras 15.2/15.3)	Yes [No	
COII	mem	o.				
	18.4	Section 16 access to buildings for fire-fighting personnel Do you support the proposals for amending the guidance on number and location of firefighting				
		shafts? (para 16.7 16.8)	V [Ť	KI-	
Con	nment	es:	Yes		No	
		9				
	18.5	Do you support the proposals for amending the guidance on design and construction of firefighting shafts? (paras 16.9-16.11)	Yes [No	
Con	nment	ts:	165		NO	
	18.6	Your views would be welcomed on what, if any, sections of BS 5588 Part 5 2005 should be referred to here (paras 16.9-16.11)				
		to here (paras 10.5-10.11)				
Con	nment	ts:				
	18.7	Section 17 venting of heat and smoke from basements Do you think the guidance in section 17 "venting of heat and smoke from basements" should be changed as a result of the findings of the ODPM report "Firefighting in under-ventilated compartments"?	Yes [No	
Con	nmen	ts:				

19	19.1	Appendix A: Performance of materials products and structures This appendix has been amended to take account of the new European classification system for roofing. Do you support the proposed changes? (para 6)			
Cor	nment	s:	Yes	No	
20	20.1	Appendix B: Fire doors Do you support the additional guidance on fire resisting doors highlighting the importance of considering the door set as a complete assembly? (para 1)	Yes	No	1
Cor	nment	s:			
Cor	20.2	Do you support the additional guidance on the 25% restriction for fire resisting doors in compartment walls? (para 5)	Yes	No	
21	,	Appendix E: Definitions			80
Com	21.1	This appendix Includes a number of new or amended definitions. Do you support the proposed changes?	Yes	No	

22	2	Appendix 6: Provision of Information		
	22.1	Does this proposed new appendix adequately address the need for guidance on what information should be recorded and passed on the the building owner?	Yes	No 🔲
Con	nments	5:		
23	ž	Appendix H: Small Premises		
	23.1	Do you support the inclusion of this guidance in the		
		Approved Document?	Yes 🗌	No 🗔
Con	nments	3:	103	110
	23.2	Should the guidance on small premises be retained in an annex or included in the main body of the Approved Document?	Yes	No T
C = W		••		

25 Any other issues

Are there any other issues regarding the AD B volume 2 "Building other than dwellings" that you would like to raise?

26	Regulatory impact Assessment (RIA)			
26.1 Commen	Frequency of change Some stakeholders have suggested that Part B of the Building regulations should be reviewed and updated every 5 years. Would you support this frequency of change? ts:	Yes	No	
26.1	Costs Do you have comments on the costs identified in the RIA? ts:	Yes	No	
26.2 Commen	Benefits Do you have any comments on the benefits identified in the RIA? ts:	Yes	No	
26.2	Specific costs As part of your response to this questionnaire are you willing to provide an assessment of the impact of these new standards? ts:	Yes	No	

Specific impacts of sprinkler protection				
installation of sprinklers in premises with special risks such as care homes for the elderly. In order to facilitate further consideration of this proposal are you able to provide any information, with supporting evidence, on the likely impacts, costs and benefits involved with the use of such systems?	Yes		No	
installation of sprinklers in apartment buildings over 30m in height. In order to facilitate further consideration of this proposal are you able to provide any information, with supporting evidence, on the likely impacts, costs and benefits involved with the use of such systems?	Yes		No	
		gs		
	ODPM is minded introduce a provision for the installation of sprinklers in premises with special risks such as care homes for the elderly. In order to facilitate further consideration of this proposal are you able to provide any information, with supporting evidence, on the likely impacts, costs and benefits involved with the use of such systems? ts: ODPM is minded introduce a provision for the installation of sprinklers in apartment buildings over 30m in height. In order to facilitate further consideration of this proposal are you able to provide any information, with supporting evidence, on the likely impacts, costs and benefits involved with the use of such systems? ts: Specific impacts of protected corridors in storage buildings. This is intended to address safety concerns relating to self storage type premises. In order to facilitate further consideration of this proposal are you able to provide	ODPM is minded introduce a provision for the installation of sprinklers in premises with special risks such as care homes for the elderly. In order to facilitate further consideration of this proposal are you able to provide any information, with supporting evidence, on the likely impacts, costs and benefits involved with the use of such systems? Yes **Tes* ODPM is minded introduce a provision for the installation of sprinklers in apartment buildings over 30m in height. In order to facilitate further consideration of this proposal are you able to provide any information, with supporting evidence, on the likely impacts, costs and benefits involved with the use of such systems? **Yes* Specific impacts of protected corridors in storage building ODPM is minded to introduce guidance for the provision of protected corridors in storage buildings. This is intended to address safety concerns relating to self storage type premises. In order to facilitate further consideration of this proposal are you able to provide	ODPM is minded introduce a provision for the installation of sprinklers in premises with special risks such as care homes for the elderly. In order to facilitate further consideration of this proposal are you able to provide any information, with supporting evidence, on the likely impacts, costs and benefits involved with the use of such systems? Yes ODPM is minded introduce a provision for the installation of sprinklers in apartment buildings over 30m in height. In order to facilitate further consideration of this proposal are you able to provide any information, with supporting evidence, on the likely impacts, costs and benefits involved with the use of such systems? Yes Specific impacts of protected corridors in storage buildings ODPM is minded to introduce guidance for the provision of protected corridors in storage buildings. This is intended to address safety concerns relating to self storage type premises. In order to facilitate further consideration of this proposal are you able to provide	ODPM is minded introduce a provision for the installation of sprinklers in premises with special risks such as care homes for the elderly. In order to facilitate further consideration of this proposal are you able to provide any information, with supporting evidence, on the likely impacts, costs and benefits involved with the use of such systems? Yes No No No Specific impacts of protected corridors in storage buildings ODPM is minded to introduce guidance for the provision of protected corridors in storage buildings. This is intended to address safety concerns relating to self storage type premises. In order to facilitate further consideration of this proposal are you able to provide any information, with supporting evidence, on the likely impacts, costs and benefits involved with the use of such systems? Yes No No No No This is intended to address safety concerns relating to self storage type premises. In order to facilitate further consideration of this proposal are you able to provide