

Response form for the consultation on proposals for amending

**Approved Document Associated with Building Regulations Part B – Fire safety**

<p align="center"><b>Respondent Details</b></p> <p><b>Name:</b></p> <p><b>Organisation:</b></p> <p><b>Address:</b></p> <p><b>Town/City:</b></p> <p><b>County/Postcode:</b></p> <p><b>Fax:</b></p> <p><b>E-mail:</b></p>	<p>Please return by XX/XX/XXXX to :  XXXXXXXXXXXX  Building Division  ODPM</p>
--	--

**Organisation type** (tick one box only)

Approved Inspector	<input type="checkbox"/>	Manufacturer	<input type="checkbox"/>
Architects	<input type="checkbox"/>	Other non-governmental organisation	<input type="checkbox"/>
Civil/Structural Engineer	<input type="checkbox"/>	Private individual (unaffiliated)	<input type="checkbox"/>
Commercial Developers	<input type="checkbox"/>	Professional body or institution	<input type="checkbox"/>
Consultancy	<input type="checkbox"/>	Property funder	<input type="checkbox"/>
Fire & Rescue Authority	<input type="checkbox"/>	Property Management (Facility Manager)	<input type="checkbox"/>
House or property developer	<input type="checkbox"/>	Property Manager (Energy Manager)	<input type="checkbox"/>
Housing Association (Registered Social Landlords)	<input type="checkbox"/>	Research/academic organisation	<input type="checkbox"/>
Individual in practice, trade or profession	<input type="checkbox"/>	Specific interest or lobby group	<input type="checkbox"/>
Journal/media	<input type="checkbox"/>	Testing bodies	<input type="checkbox"/>
Local authority – Building Control	<input type="checkbox"/>	Trade body or association	<input type="checkbox"/>
Local authority – Environmental health	<input type="checkbox"/>	Insurer	<input type="checkbox"/>
Local authority – other (please specify)	<input type="checkbox"/>	Other: _____	<input type="checkbox"/>

Please use a ! or √ in answering the following questions

Is your response confidential?      Yes ☐      No ☐

**Foreword:** 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.*

## **1 The format 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?*

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 ☐

- 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 ☐

### **Comments:**

If you would prefer a different format please state what this would be and explain why it would be an improvement.

## **2 Additional sections within the AD B**

- 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?*

Yes ☐ No ☐

### **Comments:**

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

**3 Introduction to the Guidance**

- 3.1 *Does the introduction text clearly and adequately describe its purpose and context?*

Yes ☐ No ☐

**Comments:**

**Adult Placement**

- 3.2 *Do you support the reference to Adult Placement Schemes? (para 0.9)*

Yes ☐ No ☐

**Comments:**

**Residential Sprinklers**

- 3.3 *Do you support the new general guidance on residential sprinkler systems? (para 0.21)*

Yes ☐ No ☐

*Residential sprinklers are also mentioned in paragraphs 2.14, 3.15, 7.16, 12.16 and 16.5*

**Comments:**

**Inclusive Design**

- 3.4 *Do you support the guidance on Inclusive Design? (para 0.24)*

Yes ☐ No ☐

**Comments:**

**Provision of information**

3.5 Do you support the proposals for guidance on the provision of information set out in the General Introduction?

Yes ☐ No ☐

3.6 Should the proposals for a new Regulation requiring provision of information for "Buildings other than Dwellings" be extended to "Dwellings"?

Yes ☐ No ☐

3.7 Should these proposals cover material alterations and extensions?

Yes ☐ No ☐

3.8 Do you think this proposal is enforceable?

Yes ☐ No ☐

3.9 Do you think there would be a cost involved?

Yes ☐ No ☐

**Comments:**

**4 B1 Means of Warning and Escape  
Section1 Fire Alarm And Fire Detection Systems**

4.1 Do you support the general amendments of Section 1 to align with BS 5839 part 6?

Yes ☐ No ☐

**Comments:**

**Material alterations**

4.2 Do you support the proposed guidance on Material Alterations? (para1.8)

Yes ☐ No ☐

**Comments:**

**Installations based on smoke alarms**

- 4.3 Do you support the proposals for providing an additional smoke alarm in the principal bedroom? (para1.3 & 1.11)

Yes ☐ No ☐

**Comments:**

**Section2 Dwellinghouses**

**Inner rooms**

- 4.4 Do you support the proposed note in the guidance for "inner inner rooms"? (para2.3)

Yes ☐ No ☐

**Comments:**

**Galleries**

- 4.5 Do you support the proposed guidance on galleries? (para2.6)

Yes ☐ No ☐

**Comments:**

**Emergency egress windows**

- 4.6 Do you support the proposed guidance on locks and stays for emergency egress windows (para2.10 Note)

Yes ☐ No ☐

**Comments:**



**Material Alterations - Loft Conversions**

- 4.7 ODPM is minded to replace the existing guidance on loft conversions with proposed new guidance aligning such building work to the formation of a three storey house. (para2.18a)  
Would you support this proposal?

Yes ☐ No ☐

**Comments:**

**Replacement Windows**

- 4.8 Do you support the proposed guidance on replacement windows? (para 2.19)

Yes ☐ No ☐

**Comments:**

**Section3 Apartments**

**Terminology**

- 4.9 Do you support replacing the term flats and maisonettes with the more commonly used term "apartment"?

Yes ☐ No ☐

**Comments:**

**Replacement Windows -**

- 4.10 Do you support the proposed additional options for the internal planning of apartments with more than one storey? (para 3.15 c & d)

Yes ☐ No ☐

**Comments:**

**Ventilation of common escape routes -**

- 4.11 Do you support the proposed guidance on natural ventilation for common escape routes? (para 3.25)

Yes ☐ No ☐

**Comments:**

- 4.12 Do you support the proposed guidance on smoke control for common escape routes using pressure differentials? (para 3.26)

Yes ☐ No ☐

**Comments:**

**Live/work units -**

- 4.13 Do you support the proposed new guidance on live work units? (para 3.51)

Yes ☐ No ☐

**Comments:**

**5 B2 Internal Fire Spread (Linings)**

**Section 5 wall and ceiling linings**

- 5.1 Do you support the extended definition of ceilings helpful? (para 5.3c&d)

Yes ☐ No ☐

**Comments:**

**6 B3 Internal Fire Spread (Structure)**

**Section 7 compartmentation**

- 6.1 ODPM is minded to introduce sprinkler protection in apartment buildings over 30m tall. (Para 7.16)  
Would you support this proposal?

Yes ☐ No ☐

**Comments:**

- 6.2 Do you support the new guidance on accommodating the predicted deflection of floors above compartment walls? (para 7.23)

Yes ☐ No ☐

Comments:

**Section 8 concealed spaces (cavities)**

- 6.3 Do you support the proposals for revised text on cavity barriers in Dwellings?(paras 8.1 – 8.8)

Yes ☐ No ☐

Comments:

**Section 10 special provisions for car parks**

- 6.4 Do you support the proposals for car parks?(paras 10.1 – 10.4)

Yes ☐ No ☐

Comments:

**7 B4 External Fire Spread**

**Section 12 space separation**

- 7.1 Do you support the proposed changes to the guidance on notional boundaries? (12.6)

Yes ☐ No ☐

- 7.2 Should these provisions only apply to premises in different ownership? (12.6)

Yes ☐ No ☐

Comments:

**Section 13 roof coverings**

- 7.3 Are you satisfied with the proposals for amending para 13.5 and Table 6 for roofing?

Yes ☐ No ☐

Comments:



**8 B5 Access And Facilities For The Fire Service**

**Section 14 fire mains and hydrants**

- 8.1 Do you support the new proposals for private hydrants? (para14.7)

Yes ☐ No ☐

**Comments:**

**Section 15 vehicle access**

- 8.2 Do you support the proposals for amending the guidance on Buildings not fitted with fire mains? (paras 15.2/15.3)

Yes ☐ No ☐

**Comments:**

**Section 16 access to buildings for fire-fighting personnel**

- 8.3 The ODPM is minded to amend the guidance on number and location of firefighting shafts. (paras 16.5/16.6) Would you support this proposal?

Yes ☐ No ☐

**Comments:**

- 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 ☐

**Comments:**

- 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)

**Comments:**

**Section 17 venting of heat and smoke from basements**

- 8.6 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 ☐

**Comments:**

**9 Appendix A: Performance of materials products and structures**

- 9.1 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 ☐

**Comments:**

**10 Appendix B: Fire doors**

- 10.1 The ODPM is minded to remove the requirement for self closing devices on doors within dwellings. (para 2) Would you support this proposals?

Yes ☐ No ☐

**Comments:**

**11 Appendix E: Definitions**

- 11.1 This appendix Includes a number of new or amended definitions. Do you support the proposed changes?

Yes ☐ No ☐

**Comments:**

**12 Any other issues**

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

**Comments:**

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

**13 Introduction to the Guidance**

- 13.1 *Does the text of the introduction clearly and adequately describe its purpose and context?*

Yes ☐ No ☐

**Comments:**

**Schools**

- 13.2 *Do you support 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 ☐

**Comments:**

**Inclusive Design**

- 13.3 *Do you support the proposed new guidance on inclusive design? (para 0.27)*

Yes ☐ No ☐

*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*

**Comments:**

**Management**

- 13.4 *Do you support the proposed advice on the management of fire safety in premises (para 0.28)*

Yes ☐ No ☐

**Comments:**

**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.*

Yes ☐ No ☐

**Comments:**

**Alternative approaches**

13.9 *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)*

**Comments:**

**14 B1 Means of Warning and Escape**

**Section 1 Fire alarm and fire detection systems**

14.1 *Do you support the general amendments of Section 1 to align with BS 5839 part 1?*

Yes ☐ No ☐

**Comments:**



- 14.2 *Do you support the proposed additional guidance on warnings for people with impaired hearing?*

Yes ☐ No ☐

Comments:

**Section 2 Design for horizontal escape**

- 14.3 *Do you support the proposed guidance on access control measures? (para 2.6)*

Yes ☐ No ☐

Comments:

- 14.4 *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 ☐

Comments:

- 14.5 *Do you support deletion of the "2½ degree rule" in Diagram 2?*

Yes ☐ No ☐

Comments:

- 14.6 *Do you support the proposed new guidance on means of escape in buildings with open spatial planning? (para 2.12)*

Yes ☐ No ☐

Comments:

- 14.7 *Do you support the proposed new guidance on calculating the minimum width of ground floor storey exits? (para 2.23)*

Yes ☐ No ☐

**Comments:**

- 14.8 *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. Would you support this proposal?*

Yes ☐ No ☐

**Comments:**

- 14.9 *Do you agree that additional measures are necessary in this type of premises?*

Yes ☐ No ☐

**Comments:**

- 14.10 *Do you support the proposed new guidance on progressive horizontal evacuation in residential care homes (paras 2.32 to 2.43)*

Yes ☐ No ☐

**Comments:**

- 14.11 *ODPM is minded to introduce a provision for the use of sprinkler protection in care homes. (para 2.36) Would you support this proposal?*

Yes ☐ No ☐

**Comments:**

- 14.12 *Do you think that the need for sprinkler protection should only apply to care homes designed using progressive horizontal evacuation?*

Yes ☐ No ☐

Comments:

### 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 ☐

Comments:

- 14.14 *Do you support the suggestion that firefighting lifts can be used for the evacuation of disabled people? (para 3.14)*

Yes ☐ No ☐

Comments:

- 14.15 *ODPM is minded to change the guidance on discounting of stairs for tall buildings designed for phased evacuation. (para 3.21) Would you support this proposal?*

Yes ☐ No ☐

Comments:

- 14.16 *Do you agree with the proposed change to the guidance on phased evacuation where, in the first instance, only the fire floor is evacuated? (para 3.27)*

Yes ☐ No ☐

Comments:

**Section 4 General provisions**

- 14.17 *Do you support the proposed additional guidance on the provision of door fastenings? (para 4.11)*

Yes ☐ No ☐

**Comments:**

- 14.18 *Do you support the proposed guidance on level thresholds for final exits? (para 4.33)*

Yes ☐ No ☐

**Comments:**

- 14.19 *Do you support the proposed additional guidance on the provision on mechanical ventilation and air conditioning systems? (para 4.46 – 4.50)*

Yes ☐ No ☐

**Comments:**

**15 B2 Internal Fire Spread (Linings)**

**Section 5 wall and ceiling linings**

- 15.1 *Is the extended definition of ceilings helpful? (para 5.3c&d)*

Yes ☐ No ☐

**Comments:**

**16 B3 Internal Fire Spread Structure  
Section 6 Compartmentation**

- 16.1 *It has been suggested that the 2000m<sup>2</sup> compartment size for single storey shops adopted in the 2000 edition of the AD B is too onerous and could be increased to 4000m<sup>2</sup>. Are you in favour of this relaxation? (Table 11)*

Yes ☐ No ☐

**Comments:**

- 16.2 *It is proposed to introduce a national maximum compartment size for single storey storage buildings of 440,000m<sup>3</sup> coupled with the repeal of similar provisions in local Acts (typically set at 7000m<sup>3</sup>). Do you support this proposal? (Table 11)*

Yes ☐ No ☐

**Comments:**

- 16.3 *Do you support the new guidance on accommodating the predicted deflection of floors above compartment walls? (para 7.24)*

Yes ☐ No ☐

**Comments:**

### **Section 8 concealed spaces (cavities)**

- 16.4 *Do you find the rewritten section on cavity barriers an improvement?*

Yes ☐ No ☐

**Comments:**



- 16.5 *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 ☐

**Comments:**

- 16.6 *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 barrier. Do you support this change? (Para 8.12)*

Yes ☐ No ☐

**Comments:**

**Section 9 protection of openings and firestopping**

- 16.7 *Do you agree with the additional guidance on ventilating ducts and fire dampers? (para 9.10 to 9.16)*

Yes ☐ No ☐

**Comments:**

**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:**

**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 ☐

**Comments:**

**Section 13 roof coverings**

- 17.2 *Are you satisfied with the proposals for amending Para 13.5 and Table 15 for roofing?*

Yes ☐ No ☐

**Comments:**

**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 ☐

**Comments:**

**Section 14 fire mains and hydrants**

- 18.2 *Do you support the new proposals for private hydrants? (para 14.7)*

Yes ☐ No ☐

**Comments:**

**Section 15 vehicle access**

- 18.3 Do you support the proposals for amending the guidance on buildings not fitted with fire mains? (paras 15.2/15.3)

Yes ☐ No ☐

**Comments:**

**Section 16 access to buildings for fire-fighting personnel**

- 18.4 ODPM is minded to amend the guidance on number and location of firefighting shafts. (para 16.7 16.8) Would you support this proposal?

Yes ☐ No ☐

**Comments:**

- 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 ☐

**Comments:**

- 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)

**Comments:**

**Section 17 venting of heat and smoke from basements**

- 18.7 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 ☐

**Comments:**

**19 Appendix A: Performance of materials products and structures**

- 19.1 *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 ☐

**Comments:**

**20 Appendix B: Fire doors**

- 20.1 *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 ☐

**Comments:**

- 20.2 *Do you support the additional guidance on the 25% restriction for fire resisting doors in compartment walls? (para 5)*

Yes ☐ No ☐

**Comments:**

**21 Appendix E: Definitions**

- 21.1 *This appendix Includes a number of new or amended definitions. Do you support the proposed changes?*

Yes ☐ No ☐

**Comments:**

**22      Appendix G: 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 building owner?*

Yes ☐      No ☐

**Comments:**

**23      Appendix H: Small Premises**

23.1 *Do you support the inclusion of this guidance in the Approved Document?*

Yes ☐      No ☐

**Comments:**

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 ☐

**Comments:**



**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?*

**Comments:**

**26 Regulatory Impact Assessment (RIA)**

**Frequency of change**

26.1 *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?*

Yes ☐ No ☐

**Comments:**

**Costs**

26.2 *Do you have comments on the costs identified in the RIA?*

Yes ☐ No ☐

**Comments:**

**Benefits**

26.3 *Do you have any comments on the benefits identified in the RIA?*

Yes ☐ No ☐

**Comments:**

**Specific costs**

26.4 *As part of your response to this questionnaire are you willing to provide an assessment of the impact of these new standards?*

Yes ☐ No ☐

**Comments:**

**Specific impacts of sprinkler protection**

26.5 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 ☐

**Comments:**

26.6 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 ☐ No ☐

**Comments:**

**Specific impacts of removal of provision for self-closing devices**

26.7 ODPM is minded remove the provision for the installation of self-closing devices on doors within apartments (except doors onto common escape routes) and in dwellinghouses (except on doors to garages). 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?

Yes ☐ No ☐

**Comments:**

**Specific impacts of removal of separate guidance on loft conversions**

- 26.8 *ODPM is minded to remove the provision of separate guidance regarding loft conversions in 2-storey dwellinghouses. 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?*

Yes

No

**Comments:**

**Specific impacts of protected corridors in storage buildings**

- 26.9 *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?*

Yes

No

**Comments:**

**Specific impacts of changes to guidance on firefighting shafts**

- 26.10 *ODPM is minded to amend the guidance on the provision of firefighting shafts. 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?*

Yes

No

**Comments:**

**26.11 Specific impacts of changes to guidance on provision of dry rising mains**

*ODPM is minded to amend the guidance on the provision of dry rising mains. 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?*

Yes

No

**Comments:**

**26.12 Specific impacts of changes to discounting stairs**

*ODPM is minded to amend the guidance on the need to discount a stair in tall buildings with phased evacuation procedures. 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?*

Yes

No

**26.13** *Do you have any general comments you would like to make on the partial RIA?*

**Thank you for your time**