

From: Jeannette Henderson <Jeannette.Henderson@communities.gsi.gov.uk>
Sent: Thursday, April 3, 2008 11:00 AM
To: Brian Martin <Brian.Martin@communities.gsi.gov.uk>
Subject: RE: Code for sustainable homes - fire

thanks.

J.

Jeannette Henderson
Sustainable Buildings Division
2/H6 Eland House
Bressenden Place
London SW1E 5DU

Tel: [REDACTED]
Email: jeannette.henderson@communities.gsi.gov.uk
Website: www.communities.gov.uk

From: Brian Martin
Sent: Thursday, April 03, 2008 10:50 AM
To: Tracey Cull; Jeannette Henderson
Cc: Anthony Burd; Antony Carpen
Subject: RE: Code for sustainable homes - fire

Jeanette

I suggest you respond to Bill as follows.

" Thank you for raising this important issue with me. I have discussed your comments with colleagues dealing with Part B of the Building Regulations and they confirmed that they are aware of your concerns. Identifying fire risks associated with changes in construction practice is one of the areas that they have been looking at and that they intend to continue to investigate."

Brian

From: Tracey Cull
Sent: Tuesday, April 01, 2008 5:37 PM
To: Jeannette Henderson
Cc: Anthony Burd; Brian Martin; Antony Carpen
Subject: RE: Code for sustainable homes - fire

J - further to this exchange - there are 2 separate issues

(1) the affect of fire on the env/sust design - which is what Stephen is referring to. Is it sust to let buildings burn down? Should we expand the scope of the BR to cover env issues not just H&S? (ie should we sprinkler everything for property protection purposes). This is where CSH comes in because you could ask for things in the Code that we don't/can't ask for under Part B.

and

(2) what are the fire implications of using more "sustainable" building products - which is what BP is referring to. Many are concerned at the fact that many insulating products can contribute significantly to the spread of fire and that a number of the "exemplar structures" at BRE don't actually meet current BRs!!! Both in terms of some of the materials used and the design/layout (eg open plan staircases in tall houses, external walls covered in very burny stuff etc)

We do want to do research on both issues with a project on SIPs panels being our highest priority for the new FY (item 2) under the current fwk and one on Fire and the Env (item 1) to hopefully follow later in the year when the new fwks are in place.

Hope this fills in some of the gaps but happy to chat when I'm back in next week - or collar Brian in my absence. It might be worth us (Brian!) drafting a quick reply to BP's last mail to reassure him that buildings that are constructed for a purpose (rather than display) still have to meet the requirements of Part B & that we will be looking at these issues further idc.

TC

From: Jeannette Henderson
Sent: Friday, March 07, 2008 5:30 PM
To: Stephen Phillips; Tracey Cull
Subject: RE: Code for sustainable homes - fire

I'm happy that the Code doesn't cover everything - it doesn't make sense to duplicate. Surely on the Health and Safety we wouldn't have a gold standard anywhere other than as minimum requirements?

I think there are probably a whole host of issues like this that we need to go through before you leave.

J

Jeannette Henderson
Sustainable Buildings Division
2/H6 Eland House
Bressenden Place
London SW1E 5DU

Tel: [REDACTED]
Email: jeannette.henderson@communities.gsi.gov.uk
Website: www.communities.gov.uk

From: Stephen Phillips
Sent: 07 March 2008 17:14
To: Jeannette Henderson; Tracey Cull
Subject: RE: Code for sustainable homes - fire

J:

The code was never intended to cover all B Regs stuff since nearly all of the regs aren't to do with sustainability, they're about health and safety. So we covered a whole bunch of stuff (as recommended by the Sustainable Buildings Task Group), some of which was in regs (energy)

and most of which wasn't.

The issue of fire / sustainability was raised in the original code consultation (b regs doesn't cover property protection, only protection of people) - ie how can it be sustainable to let a building burn down. Ant was going to initiate some research to look at this...

Steve

From: Jeannette Henderson
Sent: Friday, March 07, 2008 4:07 PM
To: Tracey Cull
Cc: Stephen Phillips
Subject: FW: Code for sustainable homes - fire

Hi Tracey

I have absolutely no idea what Bill Parlor is talking about. If you scan down the chain you will see that he has seen the draft April 08 version of the Code technical guide. He wanted fire to be recognised, John Tebbit replied that this wasn't the time to raise such things. I tried to reassure him that building regs still applied even if you built a Code homes and he has explained his point. Not a clue what Class 0 is or anything else (although I get the bit about panels covered with inadequate fire proofing). I'd be really grateful if you could explain sometime what he's talking about and also whether he has a point and the Code ought to cover it - ie we should think about it for the 2010 revision.

Stephen - do you know why we didn't cover fire (is it the same as ventilation - we thought building regs sufficed).

J.

Jeannette Henderson
Sustainable Buildings Division
2/H6 Eland House
Bressenden Place
London SW1E 5DU

Tel: [REDACTED]
Email: jeannette.henderson@communities.gsi.gov.uk
Website: www.communities.gov.uk

From: Bill Parlor [<mailto:bill.parlor@asfp.org.uk>]
Sent: 07 March 2008 13:35
To: Jeannette Henderson
Cc: wilf.butcher@asfp.org.uk; 'John Tebbit'; bill.parlor@asfp.org.uk
Subject: RE: Code for sustainable homes

Jeannette, thank you for your note.
I can easily agree and note that AD/B will still apply, but we have had a very large dependency on the Class 0 contrivance for building products since the 1960's. This was originally introduced to permit paper faced plasterboard. Previously, the weaknesses of the Class 0 approach has largely been compensated by relatively robust and traditional building techniques. However now, with modern methods and 'sustainability' as a buzz word, designers have

taken their eyes off the ball.

The consequence is that we see massive increase in fire load introduced into the building fabric, often protected by little more than a thin film of aluminium foil. If the foil or alternative covering remains intact Class 0 can be maintained. If not, then flashover can be reached in seconds – yes seconds not minutes – with combustible lining products.

Vulnerable points will occur wherever building services penetrate the combustible materials. Its not just about damaged systems.

The prefabricated modular system has similar worries associated with the basic use in innovative design.

Regrettably, we are sailing ever closer to a great calamity, unless sense and better understanding prevails.

In recent times the weakness of over reliance of the Class 0 approach was demonstrated in the sandwich panel market, where steel sheet covering was used [much more robust than aluminium foil].

The large spate of fires, deaths and near deaths that followed caused Appendix F to be added to AD/B, as guidance but not as a requirement.

Unfortunately, designers have not linked the two issues at all. Viz – hazardous panels and modern methods of construction.

Insurers are not increasingly concerned – they are already concerned and contemplating removal of insurability for such buildings

As a great fan of many of the exciting designs and concepts, I do not seek control for control's sake but I do wish to ensure awareness of the newly created higher fire risks. These need to be highlighted and recognized in the Code as well. The detail can remain in AD/B as you suggest.

I hope that all makes sense.

I'll be happy to pop in for a chat if it would be helpful.

Regards

Bill Parlor
Technical Officer
Association for Specialist Fire Protection
Tournai Hall, Evelyn Woods Road
Aldershot, Hants GU12 2LL, United Kingdom
E-mail: bill.parlor@asfp.org.uk
Office tel: [REDACTED]
Home office tel/fax [REDACTED]
www.asfp.org.uk

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Company Limited by Guarantee Registered in England No 1292282
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From: Jeannette Henderson [mailto:Jeannette.Henderson@communities.gsi.gov.uk]
Sent: 07 March 2008 09:19
To: Bill Parlor
Cc: John Tebbit; wilf.butcher@asfp.org.uk; Geoff Deakin; bill.parlor@asfp.org.uk
Subject: RE: Code for sustainable homes

Bill

The Code does not seek to replace building regulations it sets aspirational standards above building regulations in some areas, some of which might become building regulations in due course (ie energy efficiency). There are other things which aren't

included in building regs at all. However whatever is build to a Code standard still has to comply with building regulations eg energy efficiency and airtightness. The Code doesn't set specifications for ventilating for health - this is done through Part F. Part B - fire regulations - continue to apply to any building including those built to Code standards.

As John says, we are not seeking to change the Code at the moment. We are seeking industry's opinion as to whether the changes that have been made - either to align the Code with existing regulations or to increase clarity, make sense and are really an improvement or have we made matters worse.

Jeannette

Jeannette Henderson
Sustainable Buildings Division
2/H6 Eland House
Bressenden Place
London SW1E 5DU

Tel: [REDACTED]
Email: jeannette.henderson@communities.gsi.gov.uk
Website: www.communities.gov.uk

From: Bill Parlor [mailto:[REDACTED]]
Sent: Thursday, March 06, 2008 5:52 PM
To: Jeannette Henderson
Cc: 'John Tebbitt'; wilf.butcher@asfp.org.uk; Geoff Deakin;
bill.parlor@asfp.org.uk
Subject: Code for sustainable homes

Ms Henderson,
John Tebbitt of Construction Products Association has provided us with copy of the latest files re Sustainable Homes.
As the documents completely omit 'safety in fire' or sensible selection of materials, are we to believe that the codes should still inherently comply with Building Regulations and Approved Document B?

I raise this because, in considering the range of buildings on show at BRE Watford, most observers with fire experience have expressed concerns with almost all the designs in regard to fire safety!
Not only do the technical documents omit fire but they also omit any sources of potential advice in the reference sections.
Meanwhile we see prize winning designs based on 300mm thick polystyrene!
For me this is quite terrifying!

Of course there may be some hidden expectation that our own guidance documents will be discovered via the references in Approved Document B.
Comments and thoughts would be welcomed
In assurance of our keenest interests
Yours sincerely

Bill Parlor
Technical Officer
Association for Specialist Fire Protection
Tournai Hall
Evelyn Woods Road

Aldershot

www.asfp.org.uk

Home tel [REDACTED]

Bill.parlor@asfp.org.uk

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