

How to respond (Annex A)

Please use the table format below to feedback comments for Technical changes relating to ADB. Once complete, email this document to ADBconsultation@communities.gsi.gov.uk

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Please state whether you are responding on behalf of yourself or the organisation stated above	Responding on behalf of the organisation

Please indicate whether you are applying to this consultation as:	Select one
Builder / Developer	
Designer / Engineer / Surveyor	
Local Authority	
Building Control Approved Inspector	
Architect	

Manufacturer	
Insurer	
Construction professional	
Fire and Rescue Authority Professional	
Property Manager / Housing Association / Landlord	
Landlord representative organisation	
Building Occupier / Resident	
Tenant representative organisation	
Other interested party (please specify)	Trade Association

Instructions for completing the table:

Please provide comments in the table below, bearing in mind the following 4 principals.

- What issues need to be resolved?
- Why should they be reviewed?
- What evidence already exists?
- What are the potential impacts of change
- Please provide any evidence you or your organisation have to support your suggestion

If your comment relates to a specific area of technical guidance in ADB, please also provide the following:

- The specific Approved Document B Volume number you are referring to (Volume 1 or Volume 2)
- The specific section and subsection you are referring to (e.g. section 2.5)
- The specific paragraph (e.g. 2.5(a)(i)) and if applicable the specific diagram, table, note or appendix you are referring to.
- Please ensure you clearly detail your justification for change in the comment box.
- Please clearly detail your proposed amendment in the proposed change box.

Area of fire and safety	ADB area	Relevant section of ADB (if applicable): volume/paragraph/diagram number	What issues need to be resolved and why should they be reviewed?	What evidence already exists?	What are the potential impacts of change?	Details of evidence provided
General	Scope of fire safety		<ol style="list-style-type: none"> 1. Fire safety addressing the whole building and its site. 2. Bring refurbishment in to scope with more clarity - it should be clearer when work is required to be signed off by building control, few people, for example would seek approval to replace a flat-entrance door, however, this is work that may fundamentally undermine fire integrity. 3. Increase the fire resistance of linings to protect structure. 4. Wider inclusion of fire suppression systems. 5. Identify boundaries between ADB and BS 9999 6. Dwellings and Non-Dwellings – Further clarification is required 7. Include Diagrams and Schematics to fully describe system types and buildings 9. Where standards are cross-referenced, these must be 			


			<p>required to be fully accessible (ideally freely available), clear and understood.</p> <p>10. Industry needs a way to summarize standard fire resistance and reaction to fire test. Test evidence is currently contained in a full; and long report. There is currently no standard way of summarizing these reports which leads industry to provide house style 'certificates' which can be misleading and wanting.</p> <p>A standard summary from a full test issued by the test facility at the time of the report would provide clarity and a method for comparability and at the same time provide companies the facility to withhold confidential data from the public arena.</p>			
	Purpose Groups					

	Specialised housing and care homes					
	Trigger heights and thresholds					
	Age Distribution					
	Smoke and Toxicity		<p>This report recognises that toxicity warrants more attention, but complexity of regulating in this arena. It highlights that lack of empirical information on which to base regulation and the usefulness of singling out construction products and emphasising that if legislation related to the toxicity of smoke from construction products were considered appropriate that it would need to be part of a holistic approach to fire and effectiveness of measures (i.e. contents are a significant contributor). Primarily focus must be on restricting the spread of fire and smoke within a building.</p>	<p><i>Study to evaluate the need to regulate within the Framework of Regulation (EU) 305/2011 on the toxicity of smoke produced by construction products in fires”.</i></p> <p>https://www.europeanfiresafetyalliance.org/wp-content/uploads/2018/01/Smoke-Toxicity-Final-Report-full.pdf</p>		

	Construction Technologies and Designs		<p>Many current construction technologies are not easy to match with current ADB. This may call for a new approach in the regulations. Regulation should not limit but provide a framework to manage innovation.</p>			
	Construction details		<p>Fire door threshold floor finishes. BS9999 includes the requirement that textile floor coverings should be interrupted on all doors to and within a fire fighting shaft along the line of the threshold of the doorway with a metal or other non-combustible strip not less than 50mm wide. There is no reference to this in BS5588 or AD B. Presumably since BS9999 wraps up all parts of BS5588, this will be considered in any new issue of AD B. However, it isn't specific enough. There seems to be no explanation as to why this is required on firefighting shafts and not in, for example, protected lobbies or escape routes in general. FIS is often asked for clarification on this and in light of recent events it seems inadequate to simply say that if it isn't mentioned in AD B, then it's OK.</p> <p>FD20 (Table B1)</p>	<p>https://www.lab.c.co.uk/sites/def</p>		

			<p>Is FD20 a relevant standard in modern buildings? Very few products are certificated or tested to this standard and explanations in the market such as BCA Technical Guidance Note 9 whilst recognising this still support the practice</p> <p>Insulated glazing AD B isn't sufficiently prescriptive on where insulated glazing is required. Table A4 explains the limitations on uninsulated glazing but isn't sufficiently prescriptive on what the 'Position of Glazed Element' might mean. It all seems to relate to conditions other than those in complex office buildings. All too often we specifications for glazed fire screens only specifying a fire resistance period or using the door designation of FD#. In the absence of any statement requiring insulation, the presumption would be that Integrity only is all that is required. The reality is often very difficult.</p> <p>Table A4 is also not clear on what a 'glazed area' is. The intention of this section is presumably to prevent fire spread to adjacent floor finishes, so why does it not recognise the</p>	<p>ault/files/bca_guidance_note_9_fire_doors_in_dwelling.pdf .</p>		
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			<p>uninsulated nature of the door threshold clearance gap? Is the glazed area the clear area of glass? Does it include the framework at the bottom? FIS has asked this question of a number of building control bodies and consultants and there seems to be an inconsistent approach.</p> <p>Further clarification is required to explain differences through use of tables and diagrams.</p>			
	Other issues – please specify theme		<p>In response to Dame Judith Hackitt request that industry respond and come up with solutions, FIS has worked with its members and the wider community to develop a three stage call for evidence of compliance and competency. This PPP initiative creates an audit trail of which products are supplied and installed and the competency of the installer, using readily available technology.</p>	<p>https://www.thefis.org/knowledge-hub/product-process-people/</p>		
Requirement B1: Means of	Means of escape from blocks of flats					

warning and escape	Means of escape for disabled people					
	Other issues – please specify theme					
Requirement B2: Internal fire spread (linings)	Other issues – please specify theme		Greater clarity is needed to understand terms such as combustible, and these need to be considered in relation to the fire load that is increased as result of using products within a building construction.			
Requirement B3: Internal fire spread (structure)	Compartmentation		<p>Compartmentation and fire stopping.</p> <p>All compartment walls and floors should be clearly marked on site to ensure that and work to penetrate the compartment will not compromise</p>	 <p>https://www.thefis.org/wp-content/uploads/2016/09/Technical-note-Fire-</p>		

			<p>performance of the compartment. FIS in conjunction with ASFP have produced a labelling scheme to address this issue.</p> <p>This work can currently be undertaken without the need to provide evidence of competency, and there is evidence of inappropriate use of materials beyond their tested parameters.</p> <p>FIS in conjunction with Association of Passive Fire Protection (ASFP) Building Engineering Services Association (BESA), Building services research and information Association (BSRIA), and the Gypsum Products Development Association (GPDA) are currently developing a guidance document titled Design, installation and verification of (MEP) service penetrations in fire resistant elements, which will be launched in Q1 2020</p> <p>22. Resistance to fire Although its encouraging that test methodologies are evolving, remains confusion between test standards (established to create a reasonable amount of time, never to be prescriptive).</p>	Labelling-Scheme-with-ASFP.pdf		
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			<p>However, it's important not to throw the baby out with the bath water, if improved tests are developed, it shouldn't invalidate everything that has gone before. Mechanisms should be considered for cross referencing. (e.g. The cost of converting the entire fire door industry from BS to EN standards is significant for no real discernible benefit, there is currently no facility to compare the BS test to the EN test).</p> <p>Throughout the document we recommend that BS Fire resistances are still included, if omitted it could lead to a huge impact on conformance and compliance across industry</p> <p>Designers should be directed towards a whole building approach where products become systems within a building.</p> <p>Retrospective installation of services through compartmentation should require a considered documented approach before works can start and evidence of compliance after the event. In essence a recognised works permit.</p>			
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			It is time to review compartments sizes and fire resistances aligned to each building type.			
	Sprinklers and other Fire Suppression systems					
	Other issues – please specify theme		High rise residential building poses additional stresses on the fit-out element of the construction due to the movement of the building in high winds, and although this is designed in to the structure it can have a profound effect on the dry-lining forming the walls and ceilings as well as the M&E.			
Requirement B4: External fire spread	Space Separation					
	Other issues – please specify theme		.			

Requirement B5: Access and facilities for the fire service	Access and Facilities for the fire and rescue service					
	Basements					
	Other issues – please specify theme					