

RIBA Consultation Response to the ‘Clarification of Approved Document B and Next Steps for Part B of the Building Regulations’ – 11 October 2018

Consultation questions

Question 1	Respondent details
Name	Jane Duncan OBE
Position (if applicable)	Past President RIBA
Organisation (if applicable)	Royal Institute of British Architects
Address (including postcode)	66 Portland Place, London, W1B 1AD
Email address	info@riba.org
Telephone number	+44(0)20 7580 5533
Please state whether you are responding on behalf of yourself or the organisation stated above	On behalf of the Royal Institute of British Architects

Question 2	Select one
Please indicate whether you are applying to this consultation as:	
Builder / Developer	
Designer / Engineer /Surveyor	
Local Authority	
Building Control Approved Inspector	
Architect	
Manufacturer	
Insurer	
Construction professional	
Fire and Rescue Authority representative	
Property Manager / Housing Association / Landlord	
Landlord representative organisation	
Building Occupier	
Tenant representative organisation	
Other interested party (please specify)	Professional body

Question 3	Yes/No/Don't Know
<p>a) Do you agree that the volumes of ADB should be split between dwellings and non-dwellings?</p> <p>b) If no, how else should they be split?</p>	<p>Yes, the proposed split of ADB into ‘Volume 1: Dwellings’ and ‘Volume 2: Buildings other than dwellings’ is practical.</p>

Royal Institute of British Architects

66 Portland Place,
London, W1B 1AD, UK

Tel: +44 (0)20 7580 5533
Fax: +44 (0)20 7255 1541
info@riba.org
www.architecture.com

Question 4	Yes/No/Don't Know
<p>a) Do you agree that flats should be included in the same volume of ADB as dwellings?</p> <p>b) If no, please give a reason for your answer.</p>	<p>Yes, as Q3a above.</p>

Question 5	Yes/No/Don't Know
<p>a) Do you think there are sections of guidance where the amendments have gone beyond providing clarification?</p>	<p>The redrafted Volumes of ADB have made the documents easier to read and the RIBA welcomes the new requirement 'Intention' statements. However, the update has not yet provided the clarity the RIBA and others have called for, to address ambiguous guidance on meeting the Building Regulations 2010.</p> <p>The RIBA welcomes the announcement of a full-scale review of Approved Document B, that is due to commence in autumn, and recommends that sufficient resources are given to this piece of work to ensure that it is as swift and thorough as possible. The industry has been anticipating this since a formal review of the current Approved Document B (Fire Safety) of the Building Regulations was first proposed by the Secretary of State for Communities and Local Government in 2013, in response to the Coroner's rule 43 letter, following the inquest into the deaths resulting from the 2009 fire at Lakanal House. In her letter, the Coroner stated:</p> <p><i>"Approved Document B is a most difficult document to use. Further, it is necessary to refer to additional documents in order to find an answer to relatively straightforward questions concerning the fire protection properties of materials to be incorporated into the fabric of a building. It is recommended that your Department review Approved Document B to ensure that it:</i></p> <ul style="list-style-type: none"> <i>• provides clear guidance in relation to Regulation B4 of the Building Regulations with particular regard to the spread of fire over the external envelope of the building and the circumstances in which attention should be paid to whether proposed work might reduce existing fire protection</i> <i>• is expressed in words and adopts a format which are intelligible to the wide range of people and</i>

<p>b) If yes, please tell us where and the reason for your answer.</p>	<p><i>bodies engaged in construction, maintenance and refurbishment of buildings, and not just to professionals who may already have a depth of knowledge of building regulations and building control matters</i></p> <ul style="list-style-type: none"> • <i>provides guidance which is of assistance to those involved in maintenance or refurbishment of older housing stock, and not only those engaged in design and construction of new buildings.”</i> <p>The recommendations from the coroners report should be addressed by the full-scale review and the RIBA recommends that the following baseline prescriptive building regulation requirements are included:</p> <ul style="list-style-type: none"> • Non-combustible external walls – significant products in external wall construction for existing or new buildings over 18m in height must be certified ‘non-combustible’ (European classification A1) products only. • More than one means of escape – in all new multiple occupancy residential buildings, a requirement for at least two staircases, offering alternative means of escape, where the top floor is more than 11m above ground level or the top floor is more than three storeys above the ground level storey (as required for commercial buildings). • Sprinklers – retro-fitting of sprinklers / automatic fire suppression systems and centrally addressable fire alarm systems to existing residential buildings above 18m from ground level as ‘consequential improvements’ where a building is subject to ‘material alterations’. • Mandatory requirement for sprinklers/automatic fire suppression systems and addressable central fire alarms in all new and converted residential buildings, as already required in Wales.
---	---

Question 6	Yes/No/Don't Know
<p>a) Is the signposting to standards and other documents clear in ADB?</p> <p>b) If no, please tell us how you think it could be presented in a clearer manner.</p>	<p>No.</p> <p>The RIBA welcomes the addition of bold text to highlight British and European Standards, however this should also be applied to references to all 'Legislation' and 'Other documents'.</p> <p>Information signposting is not always clear, for example guidance in relation to 'calculating acceptable unprotected areas, Vol 1, B4, Section 10.4' should provide clearer guidance to the user when they will have to refer to BRE report BR 187, i.e. when Methods 1 and 2 are not appropriate.</p>

Question 7	Yes/No/Don't Know
<p>a) Do you think there is any guidance in ADB which should be in an industry standard instead?</p> <p>b) If yes, please tell us which sections/s and the reason for your answer?</p>	<p>No.</p> <p>ADB should be detailed sufficiently to provide adequate guidance on meeting the Building Regulations 2010 for most buildings without the need to refer to other guidance.</p>

Question 8	Yes/No/Don't Know
<p>a) Does the "Assessment of Impact" in Appendix B provide a proportionate presentation of the likely impacts of the proposed change?</p> <p>b) Please provide any additional evidence you may have available on the impact of the proposed change.</p>	<p>The RIBA has no evidence to disagree with the initial impact assessment, however the notion of a 10 year assessment does not reflect the need for a comprehensive review and a revised Approved Document much sooner.</p>

No.	Volume number (1 or 2)	Section & subsection	Paragraph / Diagram / Table / Note / Appendix	Comment (justification for change)	Proposed change
1.	1	B4	Section 11	<p>The RIBA recommends European Classification A1 rather than A2 be used for significant products in the external wall construction, to protect against production of smoke and flaming particles/droplets. Following the government announcement to apply a ban using the lower classification (A2), the RIBA recommends that this be strictly limited to A2-s1, d0. This would ensure very limited smoke production and no flaming particles/droplets from permitted products.</p>	<p>Replace A2-s3, d2 with A1 (If this proposed change is not agreed, the RIBA recommends that this be strictly limited to A2-s1, d0)</p>
2.	1	-	Section 0.13	<p>The RIBA recommends retro-fitting of sprinklers / automatic fire suppression systems and centrally addressable fire alarm systems to existing residential buildings above 18m from ground level as 'consequential improvements' where a building is subject to 'material alterations'.</p> <p>Mandatory requirement for sprinklers/automatic fire suppression systems and addressable central fire alarms in all new and converted residential buildings, as already required in Wales.</p>	<p>Replace with 30m with 18m</p>

No.	Volume number (1 or 2)	Section & subsection	Paragraph / Diagram / Table / Note / Appendix	Comment (justification for change)	Proposed change
3.	1	B1	Sections 3.18, 3.23, 3.24	The RIBA recommends more than one means of escape in all new multiple occupancy residential buildings and a requirement for at least two staircases, offering alternative means of escape, where the top floor is more than 11m above ground level or the top floor is more than three storeys above the ground level storey (as required for commercial buildings).	Remove 3.24 and associated diagram 3.7.
4.	1	B4	Diagram 10.4	<p>Unprotected areas diagram is unclear and complicated.</p> <p>Diagram: Unprotected areas shown either side of a compartment have no restriction on separation distance, yet unprotected areas in the same compartment are restricted. The RIBA recommends that restrictions should be made on the distance between unprotected areas either side of compartment wall / floor.</p> <p>Diagram Key: Opening types (windows / vents) are not clear</p> <p>Dimensional Restrictions: Arrow styles need to be clearly different</p>	Provide clarity though an amended diagram.

No.	Volume number (1 or 2)	Section & subsection	Paragraph / Diagram / Table / Note / Appendix	Comment (justification for change)	Proposed change
5.	1	B4	Section 10.6	A fire resisting wall must be more than class B (The RIBA recommends A1).	
6.	1	B4	Section 10.10	A fire resisting wall must be more than class B (The RIBA recommends A1). This statement is unclear and complicated.	Provide clarity on the classifications of materials that contribute to unprotected areas.
7.	1	B4	Section 14	Provide reference to information regarding firefighting methods, including bridgeheads and hose deployment to aid designer knowledge	
8.	1	B5	Diagram 15.2	Clarify the reference to 'Any Building' and 'Shafts Serving Flats' in Vol 1, Dwellings, and what criteria should be adopted to select option 'a' or 'b'. Include ventilation requirements from BS 9999 in the diagram.	
9.	1	B3	Table 8.1	This relates to non-domestic uses (purpose groups 2-7).	This should refer to domestic uses.
10.	1	B3	Diagram 8.2	Diagram is confusing it purports to show exclusions but states the requirement for cavity closers	Diagram to be updated to show cavity closers as required and provide clarity on diagram title and purpose