

# 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](mailto:ADBconsultation@communities.gsi.gov.uk)

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

<b>Please indicate whether you are applying to this consultation as:</b>	<b>Select one</b>
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)	Membership Association representing parking sector

**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 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	<i>Scope of fire safety</i>	Vol. 1, Load bearing elements of structure para 4.1c. Vol. 2, Load bearing elements of structure para 7.1c. Vol. 2, Table A2.	Regulation B of the Building regulations includes the protection of people “in and about buildings”. The current Table A2 on fire resistances does not consider the context of the building.  The relevance and appropriateness of the 15 minutes fire rating is in doubt especially given potential changes in fire loading and therefore risk. Insufficient data / research currently exists to adequately inform the codes.  The level of ventilation required does not appear to have been underpinned with sufficient relevant testing and may not be appropriate or adequate to serve the desired purpose.	The fire resistances for car parks, for example, do not acknowledge the possibility of failure endangering the occupants of adjacent buildings, nor Fire and Rescue Services.  Please refer to BPA commissioned ' <b>Review of fire precautions for car parks in building codes' Revision: R02 by OFR dated: 28/02/2019</b> included with this submission for details on evidence	Address the issues raised, ultimately improving safety.  Provide an informed position from which any required amendment to ADB and associated documents can be made.	<a href="#">SCOSS Alert - Fire in Multi-storey Car Parks, SCOSS, 2018.</a>  Please refer to BPA letter reference BPA-ADB-20190301 and BPA commissioned ' <b>Review of fire precautions for car parks in building codes' Revision: R02 by OFR dated: 28/02/2019</b> both included with this submission

	<i>Purpose Groups</i>					
	<i>Specialised housing and care homes</i>					
	<i>Trigger heights and thresholds</i>					
	<i>Age Distribution</i>					
	<i>Smoke and Toxicity</i>					
	<i>Construction Technologies and Designs</i>					
	<i>Construction details</i>					
	<i>Other issues- please specify theme</i>					
Requirement B1: Means of warning and escape	<i>Means of escape from blocks of flats</i>					
	<i>Means of escape for disabled people</i>					
	<i>Other issues – please specify theme</i>					

Requirement B2: Internal fire spread (linings)	<i>Other issues - please specify theme</i>					
Requirement B3: Internal fire spread (structure)	<i>Sprinklers and other Fire Suppression systems</i>		The effectiveness of fire suppression systems (such as sprinklers) is not yet sufficiently analysed in terms of a cost vs risk benefit.	Please refer to BPA commissioned <b>'Review of fire precautions for car parks in building codes' Revision: R02 by OFR dated: 28/02/2019</b> included with this submission for details on evidence.	Inform potential changes in ADB and associated documents.	Please refer to BPA letter reference BPA-ADB-20190301 and BPA commissioned <b>'Review of fire precautions for car parks in building codes' Revision: R02 by OFR and dated: 28/02/2019</b> both included with this submission
	<i>Other issues - please specify theme</i>	Vol 2. Table A1 and Table A2.	The fire resistance periods in table A1 and A2 require review:  - Modern cars burn differently to those which were the basis of current fire guidance and the 15 minutes fire resistance for open sided car parks requires review.  The relevance and appropriateness of the 15 minutes fire rating is in doubt.	Research by BRE in 2010 demonstrated the potential for much more severe car park fires than previously thought, as demonstrated in the Liverpool Arena car park fire.  Please refer to BPA commissioned <b>'Review of fire precautions for car parks in building codes' Revision: R02 by OFR dated: 28/02/2019</b> included with this submission for details on evidence.	Address the issues raised, ultimately improving safety. A review will provide more clarity.  Inform potential changes in ADB and associated documents.	<a href="#">BD 2552 - Fire spread in car parks</a> , BRE, 2010  <a href="#">SCOSS Alert - Fire in Multi-storey Car Parks</a> , SCOSS, 2018.  Please refer to BPA letter reference BPA-ADB-20190301 and BPA commissioned <b>'Review of fire precautions for car parks in building codes' Revision: R02 by OFR dated: 28/02/2019</b> both included with this submission

Requirement B4: External fire spread	<i>Space Separation</i>					
	<i>Other issues - please specify theme</i>					
Requirement B5: Access and facilities for the fire service	<i>Access and Facilities for the fire and rescue service</i>	Vol 1 and Vol 2, B5 Guidance - Performance.	Structural resistance periods should minimise the risk to Fire and Rescue services and the adequacy of current resistance periods should be reviewed on this basis.  The fire rating (including 15 minutes) is in doubt when considering the subject of firefighting a fire in an MSCP.  The level of ventilation required does not appear to have been underpinned with sufficient relevant testing and may not be appropriate or adequate to serve the desired purpose.	In an urban environment the ability to move away from a collapsing building is limited by the adjacent buildings.  Please refer to BPA commissioned ' <b>Review of fire precautions for car parks in building codes' Revision: R02 by OFR dated: 28/02/2019</b> included with this submission for details on evidence.	Address the issues raised, ultimately improving safety.	<a href="#">SCOSS Alert - Fire in Multi-storey Car Parks</a> , SCOSS, 2018.  Please refer to BPA letter reference BPA-ADB-20190301 and BPA commissioned ' <b>Review of fire precautions for car parks in building codes' Revision: R02 by OFR dated: 28/02/2019</b> both included with this submission
	<i>Basements</i>					
	<i>Other issues - please specify theme</i>					