

HIWFRS advice in respect of HMOs and of Planning Applications not involving higher-risk premises.

Please select the most appropriate advice from the sections below:

HMOs up to three storeys in height and providing at least seven bedspaces.

Overview of the design basis of House of Multiple Occupancy (HMO)

It is understood that the building is being extended/alterd which is identified as 'building work' as defined in the Building Regulations 2010. Therefore, the fire safety design should achieve the functional requirement of Part B. The usual means of achieving this is to comply with Approved Document B (Vol 2) (AD B) or an equivalent recognised standard.

Local Authorities Co-ordinators of Regulatory Services (LACORS) and/or other Local Authority housing guidance documents are generally not suitable for use as design guides to meet current Building Regulations. This is implied within LACORS in Section 2.3 whereby the guidance assumes that all buildings designed post-1991 will comply with current Building Regulations.

It must be noted that conformance with the Building Regulations in this case requires a more onerous standard of fire safety to that required by the Regulatory Reform (Fire Safety) Order 2005. One example of this is that in accordance with AD B, a 'Residential Other' building with one floor level above first floor should be afforded with lobby protection.

The comments made by HIWFRS are based on conformance with the Fire Safety Order only. Therefore, additional provisions may need to be included to satisfy the Building Regulations.

Issues under the Regulatory Reform (Fire Safety) Order 2005 (FSO).

The application, taking into account the matters identified within your endorsement, the additional information provided, and subject to the satisfactory resolution of Points 1 to 8 below, the consultation is likely to demonstrate compliance with the Regulatory Reform (Fire Safety) Order 2005. It should be ensured that if any material amendments to the proposal as contained within this application are proposed, a further consultation is carried out.

1. Please ensure that the fire alarm and detection system conform to BS 5839-6 / Grade A / LD1, or BS 5839-1 Category L2. The evacuation strategy should be simultaneous. The fire alarm panel should be located adjacent to the exit door from the building at ground level.
2. Please ensure that the emergency escape lighting and fire exit signage are installed to the relevant British Standard to suit the new layout and changes.

3. Please ensure that the escape routes are protected in construction achieving at least 30 minutes fire resistance. The doors that open onto the escape routes should be FD30S self-closing fire doors. The means of escape corridors should be kept sterile.
4. Please ensure that cooking facilities (hob, oven, etc.) are at least 1.8m away from escape routes and doors.
5. Please ensure that there is a sound traditional construction between rooms.
6. Please ensure that all final exit doors lead to a place of ultimate safety (i.e. highway).
7. Please ensure that a Fire Risk Assessment is carried out by a competent fire safety professional prior to the building being occupied.
8. Reliance on escape windows [such as with inner-room bedroom arrangements]

Escape windows are only referred to in ADB v1 (Dwellings). Escape windows are not referred to in ADB v2 (Buildings other than dwellings). ADB v1 and V2, Table 0.1 indicates that Purpose Group 2 is addressed under ADB v2. HIWFRS therefore considers that for HMOs providing greater than six bedspaces, escape windows are not indicated by the ADB documents.

LACORS refers to existing premises and recommends against the use of escape windows in many HMOs. This guidance specifically prohibits the use of any locking devices on these windows and requires the landlord to ensure tenants are able-bodied individuals with no high-risk characteristics.

Consideration should be given to the impact of an accident, injury or illness that impairs the mobility or capability of the occupant either temporarily or permanently. In this case it is unlikely that the resident can be immediately relocated to alternative accommodation or prevented from sleeping in the room they have a tenancy agreement for. In this case, if the resident continues to sleep in this area despite not being capable of utilising the escape window, it is likely that the landlord will be failing in their duties under Article 14 of the Fire Safety Order.

Reference is made to Section 0.6 of Approved Document B, which states that unrealistic or unsustainable management arrangements cannot be considered to have met the requirements of the regulations. Given the matters identified above, it is unclear how this arrangement can be considered a realistic or sustainable management arrangement.

The Building Control Body is invited to reconsider this arrangement and provide justification as to how this arrangement can be considered tolerable under the Building Regulations 2010, The Regulatory Reform (Fire Safety) Order 2005, and the Housing Act 2004.

General Guidance in respect of Planning Applications deemed to present a low- or medium-level of risk.

Access for Fire Appliances

Vehicular access to each building on-site should conform to the guidance contained within the relevant version of Approved Document B. Whilst it is acknowledged that Building Regulations guidance is not typically considered at the planning stage, it is observed that road layouts may be difficult to alter once planning permission is granted.

It is therefore strongly recommended that the roadway layouts be reviewed in line with this guidance to resolve any perceived issues at an early stage.

Access for High-reach Appliances

High reach appliances currently operated by the HIWFRS exceed the maximum requirements given in Section 17 of the Approved Document B. When considering high rise buildings these variations should be considered as additions and incorporated as follows. Structures such as bridges, which a high-reach appliance may need to cross should have a maximum carrying capacity of 26 tonnes. Where the operation of a high reach vehicle is envisaged, a road or hard standing is required 6m wide. In addition, the road or hard standing needs to be positioned so that its nearer edge is not less than 3m from the face of the building.

Water Supplies

Additional water supplies for firefighting may be necessary. You should contact the Water Management Team, Hampshire & IOW Fire and Rescue Headquarters, Leigh Road, Eastleigh, SO50 9SJ (hydrants@hantsfire.gov.uk) to discuss your proposals.

Fire Protection

HIWFRS would strongly recommend that consideration is given to the installation of Automatic Water Fire Suppression Systems (AWFSS) to promote life safety and property protection within the premises.

HIWFRS is fully committed to promoting Fire Protection Systems for both business and domestic premises. Support is offered to assist all in achieving a reduction of loss of life and the impact of fire on the wider community.

Fire-fighting and the Environment

Should a serious unsuppressed fire occur on the premises, the water environment may become polluted with 'fire water run-off' that may include foam. The Service will liaise with the Environment Agency at any incident where they are in attendance and under certain circumstances, where there is a serious risk to the environment, a 'controlled burn' may take place. This of course could lead to the total loss of the building and its contents.

Premises' occupiers have a duty to prevent and mitigate damage to the water environment from 'fire water run off' and other spillages.

Timber-framed Buildings

These types of buildings are particularly vulnerable to severe fire damage and fire spread during the construction phase.

The UK Timber Frame Association publication '16 Steps to Fire Safety on Timber Frame Construction Sites' provides guidance on this issue and is available from:

<https://www.structuraltimber.co.uk/wp-content/uploads/2024/01/16stepstofiresafety-3.pdf>

This guidance should be read in conjunction with the 'Joint Code of Practice on the Protection from Fire of Construction Sites and Buildings Undergoing Renovation', published by the Construction Confederation and The Fire Protection Association (Sixth Edition, ISBN 1-902790-33-2)

Copies of the 'Joint Codes of Practice' and useful sister publication, 'Construction Site Fire Prevention Checklist' (Second edition, ISBN 1-902790-32-4), are available for purchase from the Fire Protection Association: (www.thefpa.co.uk) and from the Construction Industry Press:

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