



CIBSE response to Review of Approved Document B: Fire safety

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About CIBSE

CIBSE (the Chartered Institution of Building Services Engineers) is the leading global body for building services professionals, driving sustainability, innovation and excellence in the built environment. Through our 24,000-strong international membership and over 80 industry-leading patron organisations, CIBSE empowers and equips building services engineers with the knowledge, research, training and technical guidance needed to deliver safe, energy efficient and high-performing buildings and homes.

In responding to this consultation, we have called upon expert membership groups including CIBSE Building Services Fire Safety working group and outreach to CIBSE members.

Summary of CIBSE response

Our response to this consultation can be summarised by the following points:

- The CIBSE response mainly highlights areas within building services fire safety engineering where ADB could be improved to drive better and more consistent compliance and interpretation of the engineering requirements.
- In general, the proposals may have environmental implications, including the potential for increased material use, embodied carbon and operational energy consumption associated with additional fire protection measures, fire safety systems and related infrastructure. CIBSE considers that these impacts are proportionate to the intended improvements in life safety and building resilience. Opportunities to reduce adverse environmental impacts include ensuring that fire safety measures are appropriately risk-based, avoiding unnecessary over-specification, and promoting the use of durable, maintainable and resource-efficient solutions.
- CIBSE also notes that improved clarity within Approved Document B and its' continuous review will support more consistent design outcomes, reduce remedial works and rework, and thereby deliver indirect environmental benefits through more efficient use of materials and resources.

The CIBSE response to questions is aligned to the online portal questions as follows:



Building
Safety
Regulator



Ministry of Housing,
Communities &
Local Government

Open consultation

Review of Approved Document B: Fire safety

Updated 15 April 2026

The respondent is the Chartered Institution of Building Services Engineers (CIBSE), the professional body that exists to advance and promote the art, science and practice of building services engineering, to invest in education and research, and to support our community of built environment professionals in their pursuit of excellence.

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Consultation question 1

Do you agree that the changes within this consultation should be aligned with existing changes to Approved Document B coming into effect on 2nd September 2029?

Yes - CIBSE agrees that the proposals should have a target implementation date of 2nd September 2029, aligned with the existing 2029 amendment booklet to ADB. CIBSE understand that this is intended that as of that date a full, new version, of ADB is to come into effect, which will require further consultation to consider areas for improvement not covered. Accepting the obligation of the BSR to maintain a continuous review process.

CIBSE would suggest that other areas of AD B should be assessed to improve the Building Services understanding and outcome of fire safety on projects and offer the following feedback from members for areas to improve and/or clarify: -

- **Section 9: Protection of openings and fire-stopping** – improve clarity on openings for services and more specifically consider product type than the generic term of fire stopping.
- **Section 4: Wall and ceiling linings.** Specifically, the reaction to fire of services and equipment materials– in comparison to definition for building linings.
- **Smoke control and mechanical ventilation** -improved high-level guidance on the suitable and type of ventilation strategy, including suitable test and verification that the smoke ventilation system is considered wholly as a single design responsibility. Feedback from members informs that that current guidance remains insufficiently codified for modern residential and mixed-use buildings, particularly where complex footprints, second staircases, evacuation lift lobbies, protected shafts and system interfaces are involved. CIBSE supports the inclusion of evacuation lifts and the wider provisions on vertical evacuation of disabled people, and the importance of aligned smoke control amplifies the importance to review.
- **BS 9999** Improve further clarification of AD B to align to BS 9999 code of practice for fire safety in the design, management, and use of buildings. To avoid a position where we could perhaps state a system is compliant with AD B but falls short of being compliant with any relevant British Standard.
- **1. Sprinklers - Appendix E;** -
 - More clarity on the sprinkler installation rather than just citing BS EN 12845, owing to the fact there are parts within the sprinkler standard which either contradict or do not align with ADB.
 - When sprinklers are only appearing in basements due to the presence of mechanical smoke clearance systems can leave the interpretation of Building Regulation compliance and the use of BS EN 12845 to the designer to decide.
 - Examples

- ADB states that sprinklers should be provided with additional measures to improve system reliability and should be considered a life safety system. There is however no mention within ADB on power supplies, and although it states “life safety system” there is no reference to BS 8519 or a secondary power supply. Suggesting that for BS EN 12845 compliance, a sprinkler system would use a diesel pump and a mains power pump. LPC Rules for sprinklers does permit two electric pumps under authority agreement. Equally alignment to other insurance standards such as FM Global fire prevention standards would be useful.
 - BS EN 12845 also does not seem to fully align with Appendix E.
 - ADB states water supplies should consist of either of the following: Two single water supplies complying with clause 9.61, independent of each other (or) A tank storage solution.
 - ADB also refers to Annex F of BS EN 12845, which states the water supply (at least one) shall be a superior water supply which is different to ADB.
 - Within ADB it is permissible to use sprinkler protection as a compensatory feature to address a specific risk or hazard (example case because of the mechanical smoke control ventilation). However, unless compliance to clause 5 of the BS EN 12845 is met, the installation cannot be certified to either BS EN 12845, LPC Rules, FM Global, or other code (therefore it is possibly contradictory to certify compliance to ADB as it quotes BS EN 12845).
- **Smoke Control Ventilation (basements) section B5.**
 - Para 18.11 refers to mechanical smoke extract from basements, and the core elements described in ADB follow guidance contain in BS9999. However, there are differences between ADB and BS9999, and the only mention in ADB regarding power supplies is under carparks (para 11.5) – whereas under para 18.11 there is no mention of this.
 - ADB quotes further guidance can be found within BS EN 12101-3. This is a standard that specifically addresses powered smoke and heat control ventilators (or fans) but does not cover the wider implication or design of a smoke control system. In summary it is a component performance and testing standard so is not really suitable.
 - BS 7346-4 (or even BS 9999) offer greater guidance on the system design but have wider implications and much deeper requirements for compliance, notably; Both standards require secondary power supplies to BS 8519, Both standards detail provision of make-up air.



- **Power supplies for Life Safety (BS 8519)** - ADB makes reference to BS 8519 in para 5.30 (only) and limits this only to 'large and complex building'. BS 8519 is not only for these types of buildings and likely interpretation is they relate to any life safety, firefighting, or other critical systems – which under Appendix E is sprinklers.

Consultation question 1a

If you disagree, please provide your evidence on an alternative enforcement date.

N/A

Consultation question 2

Do you agree that the existing text within Approved Document B provides sufficient clarity on the need for sufficient test data when seeking to interpret results, yes or no?

Yes - CIBSE agrees.

Consultation question 2a

If you disagree, what changes to the text can be made to improve the clarity?

N/A

3. General updates and clarifications

Consultation question 3

Do you have any comments on the small but important clarifications and minor technical changes draft guidance text?

No

Consultation stage impact assessment

Consultation question 4

Do you have any further benefits that should be considered?

CIBSE have no further comments to include in regard to the impact assessment.



4. Clarification of applicability of Approved Document B for existing buildings

Consultation question 5

Do you agree that the proposed text provided improves clarity and encourages alignment with the fire strategy, fire safety management plan, and fire risk assessment, yes or no?

Yes - CIBSE agrees text provided improves clarity and encourages alignment.

Consultation question 6

Do you have views on the content, structure, and style of the proposed text?

No

Consultation stage impact assessment

45: BSR sees this change as a clarification of existing expectations and our analysis has showed that there will not be a cost to industry by implementing this clarification.

46: Expected benefits of this change may be reduced design time, improved compliance, and improved safety levels in existing buildings which undergo building work.

Consultation question 7

Do you have views on what impact this text may have on industry?

CIBSE view is the text provides improved clarity and encourages alignment, however, there is likely to be cost related to understanding and reconsideration of current applications and buildings under construction.

Consultation question 8

Do you have views on potential benefits of the change?

No

5. Combustible elements of structure:



Introducing a height threshold for use of Approved Document B

Consultation question 9

Do you agree that Approved Document B should include a threshold above which the guidance should not be used when combustible elements of structure are used, yes or no?

Yes - CIBSE agrees and encourages alignment to addressing fire safety and durability concerns to safely expand the use of engineered mass timber, which has other environmental and cost benefits for both the industry and building owners and occupiers.

Consultation question 10

Do you agree that the 11m threshold is appropriate, yes or no?

No

Consultation question 10a

If you do not agree with the question 10 statement, at what height do you believe the threshold should be set?

CIBSE limited expertise or data on which to form a fully considered alternative view. The reservation is based on a member response to this question as follows: -

“The threshold should be based on the 4.5m self-rescue height. So that all residential building over this height should be sprinklered and buildings below this height should be sprinklered if there are problems with fire service access, suitable water supplies or there is likely to be an extended fire service attendance.”

Further evidence gathering may be appropriate before establishing a definitive threshold. Subject to impact assessment the consideration of wider use of sprinklers in residential buildings may be appropriate.

Consultation question 11

Do you have any comments on the draft guidance text?

No



6. External walls, balconies, and ban on combustible materials in and on external walls

Consultation question 12

Do you agree that section 10 (Approved Document B volume 1) and section 12 (Approved Document B volume 2) would benefit from being updated and clarified, yes or no?

Yes - CIBSE agrees.

Consultation question 13

Do you agree that the updated guidance provides greater clarity, yes or no?

Yes - CIBSE agrees.

Consultation question 13a

If you disagree, or have further comments on the clarity of the text, please provide any views and evidence on how the guidance could be further clarified or improved?

N/A

Consultation question 14

Do you agree that an exemption to the ban on combustible materials in an on external walls above 18m should be made for laminated glass in the situations specified, yes or no?

CIBSE agrees – recognising exceptions require careful oversight.

Consultation question 15

Do you agree that the definition above is clear on the scope of products to be exempt from Regulation 7(2), yes or no?

Yes - CIBSE agrees.

Consultation question 15a

If you disagree, please provide your evidence.

N/A

Consultation question 16

Do you have any comments on the draft guidance text?

No



7. Means of escape for disabled people: New provision for evacuation lifts in tall residential buildings

Consultation question 17

Do you agree that Approved Document B should include provisions for evacuation lifts, yes or no?

Yes - CIBSE agrees.

Consultation question 18

Do you agree that the threshold for provisions of evacuation lifts should be at 18m, yes or no?

No - CIBSE recognise that this is an active step forward to mandate minimum requirement, with 18m being a practical limitation on impact assessment. However Approved Document B and Approved Document M should be better coordinated, as any building allowing access for disabled persons needing a lift to enter the building and access services may also require an evacuation lift under ADM.

Consultation question 19

Do you have any additional views on the proposed provisions?

No.

Consultation question 20

Do you have any views on whether Approved Document B should include further provisions on the design of smoke control systems to support modern building design?

Yes - CIBSE agrees and supports the proposed research initiative.

Consultation question 21

Do you have any comments on the draft guidance text?

No



Consultation stage impact assessment

Consultation question 22

Do you have views on what impact this text may have on industry?

The inclusion of evacuation lifts will create important operational obligations for building owners and managers, including inspection, maintenance, repair, availability monitoring, staff training and integration with evacuation planning.

8. Sheltered housing: Replacing ‘sheltered’ housing terminology and introducing new provisions for these housing types of specialised housing.

Consultation question 23

Do you agree that Approved Document B should introduce the new terminology for ‘specialised housing,’ yes or no?

Yes - CIBSE agrees.

Consultation question 24

Do you agree that the definition of ‘specialised housing’ should differentiate between housing types that provide the regulated activity of personal care and those that do not, yes or no?

Yes - CIBSE agrees.

Consultation question 24a

If you disagree or have further comments on the clarity of the text, please provide any views and evidence on how the guidance could be further clarified or improved.

N/A

Consultation question 25

Do you agree that Approved Document B should introduce increased alarm provisions in specialised housing with care, yes or no?

Yes - CIBSE agrees.



Consultation question 25a

If you disagree or have further comments on the clarity of the text, please provide any views and evidence on how the guidance could be further clarified or improved.

N/A

Consultation question 26

Do you have views on which provision may be more suitable to implement?

- alarms
- sprinklers both
- other provision

CIBSE does not have sufficient specialist evidence to express a preference between the options, but supports proportionate measures that prioritise life safety, maintainability and effective management.

Consultation question 27

Please provide any evidence you have to support your preferred provision.

N/A

Consultation question 28

Do you have any comments on the draft guidance text?

No

Consultation stage impact assessment

Consultation question 29

Do you have views on what impact this text may have on industry?

Yes - CIBSE agrees – noting the statement “Recognising the low incidence of fires within these building types, the benefits of introducing alarms or sprinklers are directly comparable. Noting the additional maintenance costs associated with sprinklers, and the priority of protecting lives within the flat or room of fire origin, increased alarm provisions provide the best value for money improvement to life safety in these building types.”

CIBSE notes that the proposed approach seeks to balance life-safety improvements with proportionality and whole-life cost considerations. The preference for enhanced alarm provision may reduce capital and maintenance costs compared with sprinkler installations while still delivering meaningful safety benefits.



9. Additional fire safety guidance for roofs

Consultation question 30

Do you agree that updated guidance more adequately considers modern roofs, yes or no?

Yes - CIBSE agrees recognising that the Building Services Profession has limited specialist evidence on which to form an alternative view.

Consultation question 30a

If you do not agree in response to question 30, please provide your evidence on how the guidance can be improved further.

N/A

Consultation question 31

Do you have any comments on the draft guidance text?

CIBSE has no further comments on the draft guidance.

Consultation question 32

Do you have views on what impact this text may have on industry?

CIBSE recognises the need to work with industry in developing improved awareness of PV panels on buildings including good design, installation and maintenance regimes.

10. Car parks

Consultation question 33

Do you agree that Approved Document B should increase the fire resistance of multistorey open-sided car parks, yes or no?

Yes - CIBSE agrees recognising that the Building Services Profession has limited specialist evidence on which to form an alternative view.

Consultation question 34

Are there any other fire safety provisions that should be considered for open-sided car parks?

More generally the electrification of vehicles in the UK, remains an important contribution to carbon reduction. Clear guidance on the installation of chargers and related infrastructure in enclosed parking could be considered to ensure this is undertaken with due regard to fire safety.

Consultation question 35

Do you have any comments on the draft guidance text?



No

Existing car parks

124: Existing car parks are overseen and maintained under the Fire Safety Order and require regular checks and assessments to ensure they are maintained effectively. There is no evidence to suggest that existing car parks are inherently unsafe.

Consultation stage impact assessment

Consultation question 36

Do you have any views on the impact the changes to the text will have on the industry?

No

Assessment of impacts

127: A further assessment of impacts will be made following consideration of consultation responses and alongside the development of any provisions.

Consultation question 37

Please provide any additional evidence on costs, risks and benefits which should be considered in an assessment of impacts in the areas outlined in the consultation. Please provide evidence to support your response.

None

Consultation question 38

Are you aware of any particular equalities impacts for these proposals? How could any adverse impact be reduced and are there any ways we could better promote equality of opportunity or build good relations between people who share a protected characteristic and those who do not? Please provide evidence to support your response.

No



Consultation question 39

Are you aware of any particular environmental impacts for these proposals? How could any adverse impact be reduced and are there any opportunities to promote positive environmental impacts? Please provide evidence to support your response.

CIBSE recognises that some of the proposals may have environmental implications, including the potential for increased material use, embodied carbon and operational energy consumption associated with additional fire protection measures, fire safety systems and related infrastructure.

However, CIBSE considers that these impacts are generally proportionate to the intended improvements in life safety and building resilience. Opportunities to reduce adverse environmental impacts include ensuring that fire safety measures are appropriately risk-based, avoiding unnecessary over-specification, and promoting the use of durable, maintainable and resource-efficient solutions.

CIBSE also notes that improved clarity within Approved Document B may support more consistent design outcomes, reduce remedial works and rework, and thereby deliver indirect environmental benefits through more efficient use of materials and resources.