Approved Document B. No simple answer

Recent amendments to Approved Document B (fire safety) of the Building Regulations have seen a number of changes introduced to this critical part of the guidelines. Many have interpreted the amendments as being prescriptive. However, as Roger Jeynes, technical director at Samuel Heath, explains, whilst Approved Document B (AD B) has changed, the situation is not as straightforward as many would have us believe.

In the 40 years that Samuel Heath has been involved in the design and manufacture of concealed door closers, the last ten have probably seen the most changes in the market, particularly where performance standards and regulations are concerned. In addition to the considerable investment involved in product development, at Samuel Heath we have placed great importance on the need to invest time and effort into ensuring that the market is properly informed about the implications of such standards and regulations.

It is with this aim of objectivity that we now find ourselves seeking to clarify further the recent amendments to Approved Document B (AD B) concerning the requirements for door closers on fire doors.

Most involved in the specification, use and control of fire safety measures will know that AD B has very recently undergone some significant changes. Whether these changes have made the situation with regard to door closers any clearer is a matter for conjecture. At Samuel Heath, we feel that the situation is far less clear-cut than many would have us believe and offer the following points in explanation of the pertinent parts of the document:

Houses
Previously, AD B asked for door closers on fire doors leading to the stairwell in houses with a floor more than 4.5m above ground level. This would typically include, for example, 3-storey town houses or 2-storey houses which have added a loft conversion, effectively converting the dwelling to 3 storeys. Such buildings no longer need to have door closers fitted on doors to the stair but the guidance in AD B Volume 1 Appendix B still asks for a door closer on a fire door leading to an integral garage. (Concealed door closers remain many specifiers' closer of choice in such situations as they are often more convenient to install and accommodate, and impact much less on the aesthetics of the dwelling).

Flats
For blocks of flats, in the majority of cases, AD B used to ask for door closers on fire doors within the individual flat (depending on the design). Now, with respect to individual flats, AD B Volume 2 only asks for door closers to be fitted to the flat front entrance door (see Appendix B). NB: The provision for appropriate door closers to be installed to doors in the common parts is unchanged.

Residential buildings
For buildings described as “residential” (i.e. a hotel, boarding house, hostel, student accommodation, care home, etc.), self-closing
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devices would still need to be provided to all fire doors (except cupboards and service ducts, or where specifically exempted).

It should also be noted that, whatever the type of building, self-closing devices must be able to close the door from any angle and against any latch. Rising butt hinges that do not meet these criteria will now only be acceptable in cavity barriers (see Definitions in Appendix E of AD B).

However, AD B gives generic guidance of one way of meeting the functional requirements of the Building Regulations for a range of common building situations. There may be some buildings which, because of their specific design or their intended use, would need different or additional fire safety measures to be put in place.

An example of this is a House in Multiple Occupation (HMO), as defined by the Housing Act 2004. The guidance that supports this makes clear that a building’s “design and construction should help contain and limit the spread of fire. Internal doors (including entrance doors to flats) should be made of appropriate materials and properly fitted, and, where appropriate, fitted with self-closers.”

The licensing of HMOs is overseen by the Local Authority (typically Environmental Health Officers) who may require additional fire safety precautions over and above that contained in AD B guidance because of the increased risk of fire. For example, they may ask for doors to bedrooms to be self-closing fire doors because they are separating private areas from common parts, or for such doors to be fitted to a communal kitchen because of the increased fire risk.

Building Control Officers will determine whether fire prevention measures are adequate and appropriate, taking into account the nature of the intended use of a particular building at the time that the building work is carried out. But if the use changes once the building is occupied, for example, if a large house starts being used as an HMO, additional measures may be required to deal with any increase in risk.

The legislation which controls ongoing fire safety is the Regulatory Reform (Fire Safety) Order 2005, which came into effect on 1 October 2006. It applies to both new and existing nondomestic buildings and the common parts of blocks of flats and HMOs. It puts a legal obligation on the “responsible person” (usually the landlord in the case of a block of flats or an HMO) to carry out a risk assessment of the building and, where necessary, to provide additional fire safety measures.

It is, therefore, quite obvious that every building, particularly flats and HMOs, will need its fire safety requirements assessed on a case by case basis. In addition to a plethora of other criteria, decisions on what door closers to fit to which doors need to be made according to the building’s use, and a 'one size fits all' approach to the requirement for door closers on fire doors simply will not do.