

**TECHNICAL GUIDANCE DOCUMENT PART 2: VOLUME 1:  
DWELLING HOUSES.**

CONSULTATION FINDINGS AND RESPONSE.

**Table 1: Responses by type of respondent.**

Type of Organisation	Number of responses.
Architect	1
House / property developer	1
States Department	1
<b>Total</b>	<b>3</b>

**Table 2: Consultation findings.**

Questions	Yes	No	Don't know
1. Do you think that the proposals in respect of requirement 2.1 (means of escape) are reasonable?	1	2	
2. Do you think that the proposals in respect of requirement 2.2 (internal fire spread -linings) are reasonable?	2		1
3. Do you think that the proposals in respect of requirement 2.3 (internal fire spread -structure) are reasonable?	3		
4. Do you think that the proposals in respect of requirement 2.4 (external fire spread) are reasonable?	2		1
5. Do you think that the proposals in respect of requirement 2.5 (access and facilities for fire service) are reasonable?	2	1	
6. General suggestions or observations	None		

**Response to comments received with the questionnaire returns.**

No	Respondent	Comments made.	Departments response	Minister's decision
1.	Architect.	Most of the areas within the document have been made easier to understand with improved diagrams.	Support noted.	No change
1.1		The removal of the alternative approach for loft conversions in existing two storey houses is not recommended.	The current provisions for means of escape from loft conversions in existing two storey dwelling houses does not provide the same level of safety as that required for newly constructed 3 storey dwelling houses. There is no sound reason for having reduced provisions for loft conversions and the change is aimed at removing confusion and ensuring consistency of approach. In terms of the bye-law requirements for securing adequate means of escape there is no justifiable reason for retaining the lower standard for conversion works.	No change.
1.2		The statement "there should be vehicle access for a pump appliance to within 45m of all points within the dwellinghouse" is confusing.	The previous guidance stated that for dwelling houses the 45m access should be measured to a door giving access into the dwelling. The proposal is that vehicle access should be achieved to within 45m of any point in the dwelling.	Guidance to be clarified.
2.	House / property developer	The inclusion of sprinklers as an alternative to providing an alternative	The current guidance calls for a dwelling house which has a floor over 7.5m above	No change.

		means of escape in houses with more than one floor over 4.5m above ground level is unreasonable.	ground level to have at least two protected escape routes. The proposal is allow a single protected escape route in those situations if a sprinkler system is installed. Independent research has shown that sprinklers can be very effective in terms of controlling fires in the early stages, sometimes extinguishing them before they can develop. In view of this it is generally accepted sprinklers will provide an equivalent level of safety to that which would be achieved by two protected escape routes in a dwelling with an uncontrolled fire. As such the proposal is not considered to be unreasonable.	
2.1		Where fire service vehicle access cannot be achieved to within 45m of all points within a dwellinghouse, the option of enhancing the building structure should be allowed as an alternative to incorporating sprinklers.	Fire service vehicle access is required in the interests of the health and safety of people, who may be in or around the building. It assists the fire service by ensuring the building is sufficiently close to a point accessible to fire service appliances that are used to supply water for fire fighting. Enhancing the fire resistance of the building structure would increase the time before structural failure occurs but would do little to assist fire service operations. A sprinkler system will control a fire in the early stages and in some cases even extinguish it. This	No change.

			would help compensate for reduced vehicle access, whereas enhancing the fire resistance of structural elements would not.	
3.0	States of Jersey Fire Service	There should be a requirement for sheltered housing which is designed and constructed specifically for people who need assistance to live independently to be fitted with sprinkler systems.	Fire safety in sheltered housing designed specifically for residents who need assistance to live independently could be improved by having sprinklers installed. The types of unit most likely to benefit are those designed for residents who are not very mobile or are otherwise vulnerable to emergency situations. Limited guidance is given in the TGD in relation to sheltered housing and this could be extended to provide information regarding the circumstances where it would be appropriate to install a sprinkler system.	Recommendations for sprinklers to be installed in certain types of sheltered housing to be included in the TGD.
3.1		Smoke alarms should be fitted in all bedrooms, not just the principal bedroom, because the principal bedroom may not be occupied at the time of a fire, and fire loading in children's bedrooms can be extremely high.	The proposals regarding the provision of smoke alarms in dwellings already introduce some significant changes. Previously smoke alarms were only required in circulation spaces, whereas the revised TGD calls for smoke alarms to be fitted in all circulation spaces, the principal living room and principal bedroom and a heat detector in the kitchen. Changing the proposals to include smoke alarms in all bedrooms	Provisions for smoke alarms to be extended.

			would add to what is already a significant change and this could arguably be said to have additional cost implications. However, bearing in mind this change is linked to the removal of the requirement for fire doors to be fitted with automatic closers in flats and three storey houses, the net cost of this proposal is unlikely to be significant taking into account the potential benefit.	
3.2		Emergency egress windows are not accepted by the fire service in tourist accommodation due to the fact that people may be unfamiliar with the premises and because of potential difficulties in the use of windows for escape purposes. This should be made clear in the technical guidance document.	Emergency egress windows are only permitted in dwelling houses and flats up to first floor level. Above this height they are not considered appropriate. This approach has been recognised for many years in British Standards that provide recommendations for the design of fire safety in dwelling houses and flats. It is unclear as to why this should be seen as a problem in dwelling houses and flats used as tourist accommodation, however it is accepted it would be helpful to draw attention to this matter in the TGD to reduce potential confusion by designers.	Note regarding emergency egress windows to be added.