

Submitted to Scottish Building Regulations: Proposed review of fire safety topics including Cameron House Hotel recommendations:  
Submitted on 2025-02-14 09:34:40

## Consideration given to mandating active fire suppression systems in conversions of historic buildings to use as hotel accommodation

1 Which of the two options is your preferred approach ?

Option 2 - Strengthen guidance on risk-based alternative approaches

Please give us your views:

The consultation explains that the level of risk from fire spread will be influenced by multiple factors such as complexity of layout and size of the building, therefore, setting the requirement within guidance seems a proportionate approach to minimising the risk of fire spread within hotels.

The guidance could be written in a manner that provides clarity on when suppression should be installed and when there are lower risk buildings where suppression may not be merited.

We would suggest such guidance is provided with its own independent guidance clause rather than within clause 2.0.7 as proposed. We consider this will provide more gravitas to the requirement for suppression rather than being located within an introductory 'scene setting' part of the guidance. Section 6 Energy takes this approach by setting out requirements for conversions within its own specific clause to standard 6.2. Furthermore, the guidance for section 6 conversion was changed in 2023 and calls for evidence to support the approach taken that justifies the approach to compliance with the standards. We believe this call for evidence should be included in the guidance on suppression in traditional build hotels.

Having said the above, designers and verifiers both appreciate clarity of interpretation and application of the building standards. Therefore, mandating through the standard, as opposed to the guidance, would deliver this certainty. However, this approach would leave no flexibility for interpretation by verifiers on whether suppression was necessary for the building, other than through requesting a relaxation/dispensation from Scottish Ministers.

2 In the context of Option 1, do you consider the term 'hotel' needs to be defined ?

Strongly agree

Please give us your views :

The consultation explains there are various types of residential accommodation that could be considered a type of hotel (B&B, Guest House, Boarding House etc) so it would be helpful to understand the scope of the standard by defining 'hotel'. Also for Option 2 if taken forward.

3 If either mandating active fire suppression or providing guidance on risk-based alternative approaches, do you consider there is a need to define the size and/or complexity of the building being converted ?

Agree

Please give us your views :

If it is considered that suppression may be unnecessary in some smaller, lower risk hotels, guidance on the size and/or complexity will be helpful in assisting designers and verifiers to target the higher risk hotels for including suppression.

4 Are there any further comments or observations you wish to make on the topic of active fire suppression relating to conversion of traditional buildings to hotels or on the options set out ?

Yes

Please give us your views :

The focus of the consultation appears to be on larger hotels with complex layouts with a 12845 suppression system being employed. Broader application of the requirement for suppression would appear sensible for smaller traditional hotels on the basis that the risk of fire spread still exists and suppression appears to be an effective way to control fire growth. In these smaller premises perhaps a more cost effective BS 9251 system could be employed. Is there then perhaps 3 categories to be considered, high risk (12845 system), medium risk (9251 system) & low risk (no suppression).

What about the various type of suppression, would a Mist system be an option for lower risk buildings?

The consultation intimates that suppression can be used as a compensatory measure for existing failures of the building. The wording of the guidance should be written in a manner that still supports that the preferred outcome is as near to a compliant building as can be achieved with the added benefit of suppression to reduce the risk of fire spread due to traditional construction. We want to avoid designers / applicants opting for suppression on the impression that its provision addresses all existing failures in the building.

## Hidden cavities and voids, workmanship, age and variations from current standards

5 We propose not to amend the wording of paragraph 2.4 of schedule 5 of the Building (Scotland) Regulations 2004. Do you:

Agree

Please give us your views :

The scope and intent of the standard is clear in addressing fire and smoke spread risk through cavities.

6 The Scottish Government publication 'fire safety guidance for existing premises with sleeping accommodation (2022)' is currently being reviewed. Please provide any comments on the guidance in the text box below with regard to the special risks which existing hotels and similar premises may pose through the presence of hidden cavities or voids, varying standards of workmanship, age, and the variance from current standards.

Please give us your views :

It seems sensible that the risks outlined in this consultation and the benefits that suppression can play in limiting fire growth should be included in this document. Its acknowledged that suppression is mentioned, as is smoke/fire spread risk through voids, but maybe linking the two items together in the context of the type of buildings we are seeking to address in this consultation (ie traditional build with complex layouts etc) is merited.

There are references to the types of suppression systems that may be employed, perhaps information that helps understand when a 12845 or 9251 should be used could be helpful. (Mist possibly an option?)

7 Although planned for review it is proposed that the principles set out in the current Historic Environment Scotland guidance remains suitable guidance for special risks which existing hotels and similar premises may pose through the presence of hidden cavities or voids, varying standards of workmanship, age, and the variance from current standards. Do you:

Agree

Please give us your views :

8 We propose to change the guidance in the non-domestic technical handbook to recommend cavity barriers at 10m or 20m centres above fire resisting ceilings depending on the European classification for reaction to fire (A-F) of the surface exposed in the cavity. This provision would not apply to small floor or roof cavities above a fire resisting ceiling that extends throughout the building or compartment up to a maximum of 30 m in any direction. Do you:

Agree

Please give us your views :

This appears to be a sensible measure that would prevent fire spread in a large cavity over bedrooms due to a breach in the fire resisting ceiling.

9 It is proposed that additional guidance as indicated below be included within clause 2.0.7 (alternative approaches) and clause 2.15.7 (Conversion of traditional buildings to hotel use) of the non-domestic technical handbook to strengthen and add to existing guidance. Do you:

Neither agree or disagree

Please give us your views:

This seems to be a duplication of part of Q1 of the consultation. If it is proposed to mandate suppression in some type of hotels (option 1 of consultation) then is the purpose of this supplementary guidance intended to inform inclusion of suppression in hotels, or other traditionally built buildings where the standard is not mandating suppression? If that's the case, then, yes as this would mean we mandate suppression in the highest risk buildings and the guidance advises on other factors that may mean suppression should be installed in other building types to address a specific risk.

**Amending the scope of application of mandatory standard 2.15 'automatic fire suppression systems' to extensions of and conversions to flats, maisonettes or social housing dwellings**

10 It is proposed to amend standard 2.15 and guidance to recognise the current Direction for low risk extensions and conversions to flats, maisonettes and social housing dwellings. Do you:

Agree

Please give us your views:

1. The revisions proposed for Standard 2.14 should also set out how that relates to the guidance of Standard 2.9. In other words, does the amended standard/guidance that dispenses with the requirement for suppression have any bearing on meeting standard 2.9 where suppression may also be suggested where a conversion takes place.

The objectives of the Standards are not the same, therefore, in practice, the Direction, and subsequent amended standard/guidance for 2.14 should not affect compliance with Standard 2.9 but is this the intent?

2 The conditions set for dwellings that use a common escape route do not appear to provide an equal level of protection to the common part of the building. A protected enclosure within the dwelling offers two door separation from the common escape route whereas I am unsure that a single medium duration flat entrance door provides the same level of protection to the common escape route (redundancy). Similarly, the provision of a ventilated protected lobby offers the escape route two door separation plus the benefit of ventilation for smoke dispersal and is therefore the strongest protection

to the common escape route. Consideration should be given on whether all 3 options should be provided as a condition to dispensing with the requirement for suppression.

## Consideration given to extending the ban of combustibile external wall cladding systems to hotels, boarding houses and hostels

11 Please confirm any evidence, contribution or initial comments that would help towards this policy decision.

Please give us your views:

No comments other than the decision should be informed by the phase 2 research cited.

## Miscellaneous fire safety issues

12 The expert panel proposes the existing guidance on lath and plaster materials is fit for purpose and requires no further action in this context. Do you:

Agree

Please give us your views :

13 The guidance provided in BS 5266-1 is considered to provide sufficient illumination to assist in escape at low level and satisfy the mandatory standard. Low level way finding systems may be used to supplement protected or emergency lighting and can be considered on a case by case basis as part of the fire risk assessment. It is proposed that this key message is strengthened in existing fire safety guidance. Do you:

Agree

Please give us your views :

The aim of section 2 Fire is to enable occupants to escape from a building before the escape routes are compromised by smoke or fire. Accordingly, we don't consider the use of low level lighting is merited within the Technical Handbook guidance beyond flagging that it is something designers may wish to consider should a risk assessment determine its provision is merited.

14 The expert panel proposes revision of guidance in standard 2.10 to remove the need for a separate and fire resisting escape route lighting circuit. Do you:

Neither agree or disagree

Please give us your views :

The consultation does not provide any commentary around why the expert panel proposes that the requirement for a separate and fire resisting escape route lighting circuit should be removed. Further information on the rationale for this proposal would be helpful.

15 It is proposed to insert new guidance clause 2.14.10 External Premises Information as detailed below. Do you:

Agree

Please give us your views :

On the assumption that this information will be helpful to SFRS on carrying out their duties where high rise buildings are on fire.

The consultation explains the requirements will apply to 'new, converted or refurbished' high rise domestic buildings. Guidance explaining what constitutes a refurbishment should be provided to understand when verifiers should call for information plates on existing buildings subject to a building warrant.

16 It is proposed to amend the wording in clause 2.7.1 as detailed below. Do you:

Agree

Please give us your views :

This provides clarity on whether sheathing or backing board is considered to be part of the EWCS.

It would be helpful to set out what the performance criteria is where the guidance directs you to carry out a large scale façade test where combustibile sheathing is proposed in a relevant building (acknowledging that this guidance existed prior to this consultation).

17 It is proposed to amend Regulation 8(4) to align with England on the two exemptions detailed below. Do you:

Agree

Please give us your views :

Sensible to align with other UK regulation that seeks to address the same risks associated with fire spread in relevant buildings under Standard 2.7.

18 It is proposed to amend the wording in clause 2.9.8 in the non-domestic technical handbook as detailed below. Do you:

Agree

Please give us your views :

We agree with the overall intent of the proposal but feel the proposed guidance could be improved to provide greater clarity on what this means for exits and exit doorways widths. Could adopting the Approved Document B guidance bring greater clarity?

19 To avoid conflicting information and recognise current practice, it is proposed to remove the guidance in Annex 2.B of the non-domestic technical handbook and cite SHTM 81 Part 1 for new build hospitals. Do you:

Agree

Please give us your views :

Where the publication is cited, the guidance should make it clear if there are any parts within the document that are outwith the scope of the relevant standard or building regulation (for example PV and EV charge points are cited within the guidance).

20 It is also being considered to cite SHTM 81 Part 2 and 3. Do you:

Agree

Please give us your views :

Where the publication is cited the guidance should make it clear if there are any parts within the document that are outwith the scope of the standard or building regulation.

21 It is proposed to cite BS EN 13637 'Electrically controlled exit systems for use on escape routes' in the technical handbooks. Do you in principle:

Agree

Please give us your views :

It is noted that BS EN 13637 will be cited in the tech handbooks as a risk based alternative approach. Additional guidance will be key to setting out the parameters where such a locking device may be appropriate for consideration even if the guidance just directs readers to the BS EN for such parameters.

22 Do you have experience of any other miscellaneous issues affecting development which have arisen from application of current fire safety standards set under building regulations?

No

## Call for evidence on current standards

23 It is proposed to undertake further research and gather evidence to inform the policy. Please confirm any evidence, contribution or initial comments that would help towards this:

Please give us your views :

no comments

24 It is proposed to undertake further research and gather evidence to inform the policy. Please confirm any evidence, contribution or initial comments that would help towards this:

Please give us your views:

The proposed research will be important to inform new policy on battery storage systems.

25 It is proposed to undertake a literature review to inform the policy on car parks and particularly in relation to electric vehicles. Please confirm any evidence, contribution or initial comments that would help towards this:

Please give us your views :

The proposed literature review will be important to inform new policy on EV in car parks.

## Impact assessments and delivery programme

26 Are there any proposals in this consultation which you consider to impact or have implications on equality groups? Choose from the following options:

No

Please give us your views :

27 Do you think that any of the proposals in this consultation have any financial, regulatory or resource implications for you and/or your business (if applicable)? Choose from the following options:

No

Please give us your views :

28 Do you think that any of the proposals in this consultation would lead to, for example, increased costs and/or impact island communities significantly different from its effect on other communities (if applicable)? Choose from the following options:

Unsure

Please give us your views :

29 Do you agree with the proposal for amended regulations, standards and guidance to come into force early 2026 ?

Yes

Please give us your views :

A minimum lead in time of 6 months between publication of the standards/guidance and taking effect should be provided. This will allow industry to prepare for the changes taking effect.

## About you

30 What is your name?

Name:

Craig Donnelly

31 Are you responding as an individual or an organisation?

Organisation

32 What is your organisation?

Organisation:

City of Edinburgh Council

33 Further information about your organisation's response

Please add any additional context:

34 The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response only (without name)

35 Do you consent to Scottish Government contacting you again in relation to this consultation exercise?

Yes

36 What is your email address?

Email:

craig.donnelly@edinburgh.gov.uk

37 I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent

## Evaluation

38 Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Very satisfied

Please enter comments here.:

Generally the consultation was well presented. There were a couple of questions which may have been provided with additional information to provide more context around the suggested revision to standards/guidance.

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Very satisfied

Please enter comments here.: