

20/4/15

Copy also emailed
to A5C.

Structural Timber Association
The e-Centre
Cooperage Way Business Village
Alloa
Clacks
FK10 3LP

So pls pass to A5C
when next seeing him

Thanks

Date 24 March 2015

Construction Division

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Construction Sector Head of Unit
Simon Longbottom

FAO Andrew Carpenter

Dear Sirs

STA DESIGN GUIDANCE FOR SMALLER SITES < 600 m²

I am formally writing to your Board to reconsider the need for the above. HSE has worked for a number of years with the UKTFA and now STA in the support and development of your industry guidance. The UKTFA set the original threshold value of 600m² in 2011. This was an arbitrary figure set by yourselves and I believe the lowest value that was acceptable to your members at the time. HSE questioned this figure and it was always our understanding that further guidance would be produced for values less than this. Since the original version we have assisted with updates and other supporting guidance.

It was therefore disappointing to hear recently that this guidance is not being supported as the STA Fire Technical Committee consider that there are no issues with small buildings and that they have no evidence that houses or semi-detached buildings have a fire load that will cause off site damage by radiant heat and would consider it therefore a burden on smaller businesses.

Legally there is a duty to comply with the law irrespective of business size. Every site needs to consider the on and off site fire risk. Your current guidance only therefore provides information for those timber frame constructions above 600m². What guidance do you expect your industry to use for values less than this? Your existing design guide intimates that use should be made of a fire engineered solution.

We have feedback from inspectors visiting sites that people have not carried out offsite fire risk assessments as they wrongly believe they didn't have to as they were below your threshold.

Martin Milner did produced draft guidance that reduced the separation distances by a % but unfortunately Dr Bettis from HSL, who provides our scientific input on fire matters, was not able to agree this approach. However, we did discuss an option of setting out guidance with a variety of possible scenarios for smaller sites.

HSE's Construction Division plan of work for 2015/16 will again target timber frame sites for inspection. Inspectors will be checking that an on/off site assessment of risks have been made and appropriate controls and management arrangements are in place. Small sites are the priority with some 35% of inspection time being given to these. In addition the new CDM Regulations will place more emphasis on the client and Principal Designer and we will be tracking back to duty holders responsibilities when failings at site are found.

I have asked Dr Bettis to provide some examples of small sites that HSE/HSL have been involved with.

Examples of Developments under 600 m²

Providence House, 1-5 Providence Place, Islington, London (2011)

Area (estimated): 300m²

Development: 3 storey block of 8 apartments. PC: Gold Section Homes LLP (2011)

Congested Site, nearest property occupied flats and house between 2m and 3m separation.

PN issued for fire safety breaches (2nd PN for lack of falls protection)

Inspector consulted HSL on response to concerns about offsite risk.

Wells Cottage Hospital redevelopment (2011)

Area (estimated): Phase 2: 600m² Phase 3: 590m²

Development: Phase 2 = Block of 4 Town Houses, Phase 3 = Block of 5 Town Houses

On old hospital site, occupied properties and community hall <5m separation

PN Issued through concerns of offsite risk. FRA required. Inspector consulted HSL on consultant's FRA calculations.

Gap site, Glasgow (Nov 2012)

Area (estimated): 200 m²

Development: Gap filling in city centre street

Separation between zero (party wall) and 1 m. Inspector consulted sector, who discussed appropriate category with HSL.

18 Lawrence Street, York (2011)

Area: approx. 400m²

Development: Block of 5 apartments in small infill site. PC: Darren Robson Building Services.

Congested Site, nearest property occupied flats and house between 2m and 3m separation.

Inspector consulted HSL about offsite risk.

115 Church Road, Upper Norwood, London (2013)

Area: 550m²

Development: Block of apartments in small infill site. PC: ASLA Developers

Infill site. Zero to 1m separation.

Inspector served IN to produce FRA. HSL consulted about offsite FRA from Milner Associates.

A common theme for these smaller sites is that the Inspector was sufficiently concerned about standards to consider, and in many instances issue Improvement or Prohibition Notices. Many of the concerns are that on / off-site fire risk has not been or has been inadequately assessed. If there is no guidance for smaller sites to follow and when Inspectors ask for suitable and sufficient on / off-site fire risk assessments then smaller sites will have to resort to consulting fire engineers to help.

I strongly urge your Board to reconsider this lack of guidance for smaller sites. As before HSE is happy to assist in the development of any such new guidance.

I would be grateful for an early response.

Yours faithfully



Ray Cooke
Head of Construction Sector Safety

