



**NFCC**  
National Fire  
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The professional voice of the  
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Response to the '*Guide to the Design of Balconies and Terraces*' draft for public consultation

3<sup>rd</sup> March 2020

To B/209 British Standards Institution,

### **Guide to the Design of Balconies and Terraces Draft for Public Consultation**

Please find attached the National Fire Chiefs Council (NFCC) response to the Drafts for Public Consultation for '*Guide to the Design of Balconies and Terraces Draft for Public Consultation*.

NFCC is the professional voice of the UK fire and rescue services and is comprised of a council of UK Chief Fire Officers. This submission was put together through NFCC's Protection and Business Safety Committee, of which I am the Vice-Chair. The Committee is comprised of protection and fire safety specialists from across the UK.

NFCC supports the standardisation of an approach to the design of balconies and terraces and clarification of the approach that should be taken in all aspects of their design. The attached comments detail areas where we believe that further changes are needed.

NFCC is concerned that this guidance should not be viewed in isolation, and that it should take account of the ongoing work by the Ministry of Housing and Local Government (MHCLG) to regulate the use of combustible materials on the exterior of buildings. Although British Standards do not directly refer to specific regulations, it would be a missed opportunity at the comments resolution stage not to ensure that the standard incorporates the thinking behind the regulations on the ban of combustible items and the current consultation by MHCLG in this area.

Yours Sincerely,

Nick Coombe  
**NFCC Protection and Business Safety Committee Vice-Chair**

## Template for comments observations

Date: 03/03/2020

Document: BS 8579

Organiz ation	Line numb er (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment <sup>2</sup>	Comments	Proposed change	Accepted/Rejected (with rationale)  <i>BSI use only</i>
NFCC	—	3.1.1	NOTE 1	GE/TE	<p>“The envelope is deemed rain resistant, but not part of the thermal, acoustic, fire or air tightness envelope of the building, and therefore an enclosed balcony is not considered in this document a habitable room.”</p> <p>By including fire in this note, there is potential for users of the standard to be mislead into thinking that there is not a requirement for the envelope of an enclosed balcony/winter garden to satisfy any required fire performance criteria.</p>	<p>Remove the word ‘fire’ from this note.</p> <p>It is not considered that this would be detrimental to the comprehension of this definition.</p>	
NFCC	—	3.1.1	NOTE 2	GE/TE	Reference is made to BS 9991 but BS 9999 is also referenced in Clause 12 (see also comment on note to 3.1.5).	Add reference to BS 9999 in this note, if considered applicable.	
NFCC	—	3.1.5	NOTE	GE/TE	Reference is made to BS 9991 but BS 9999 is also referenced in Clause 12 (see also comment on note to 3.1.1).	Add reference to BS 9999 in this note, if considered applicable	
NFCC	—	3.6	—	TE	REI is defined as fire resistance. REI values signify fire resistance <i>criteria</i> . Therefore, it would be preferable to adopt the definition for ‘fire resistance’ given in BS 9999:2017, 3.47, which would also result in greater consistency between BS 8579 and BS 9999.	Omit definition for REI and include a definition for ‘fire resistance’. The definition given in BS 9999:2017, 3.47, could be copied in full as this also includes an explanation of REI criteria.	
NFCC	—	—	Figure 1	ED	Figure 1 includes a ‘W’ identifier but ‘W’ is not defined in the key.	Define ‘W’ in the key.	
NFCC	2	5.4	—	ED	<p>“Where balconies are enclosed on buildings containing dwellings, residential blocks or specialised housing, the guidance in BS 9991 should be followed.”</p> <p>A building would not contain “residential blocks” (a building might constitute a “purpose built block of flats”). Alternative wording should be used and this should be consistent with the terminology used in BS 9991.</p>	<p>Replace “blocks” with “units” or consider rewording sentence as:</p> <p>“Where balconies are enclosed on buildings containing dwellings or specialised housing, the guidance in BS 9991 should be followed.”</p>	

1 **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by \*\*)

2 **Type of comment:** **ge** = general **te** = technical **ed** = editorial

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NFCC	2	12.1	—	ED/TE	<p>“It is therefore vital to consider balcony organization, details and materials to reduce fire risk to a minimum.”</p> <p>Is balcony <i>organization</i> intended to refer to balcony <i>layout</i>? Consider alternative wording.</p>	Consider replacing “organization” with “layout”, or alternative text, for clarification purposes.	
NFCC	—	12.1	List item a)	ED/TE	<p>“Balconies, terraces and walkways, when exposed to fire, including from below, e.g. from a window or other openings, should not:</p> <p style="padding-left: 40px;">a) enhance fire spread on the face of the building;”</p> <p>A balcony, terrace or walkway in and of themselves cannot “enhance fire spread on the face of” a building. Alternative wording should be used and this should be consistent with regulatory guidance.</p>	<p>It is proposed that the following, or similar, text is used:</p> <p>“ a) be composed of materials or designed such that they provide a medium for undue fire spread over the external envelope of the building;”</p>	
NFCC	—	12.1	—	ED/TE	<p>“The stability of balconies above an opening, e.g. a window, garage, or bin store, when exposed to direct flame impingement from below can be determined by fire engineering...”.</p> <p>Stability cannot be “determined by fire engineering” but rather by “fire engineering analysis”, “calculation” or similar.</p>	Add the word “analysis” following “fire engineering”.	
NFCC	—	12.1	List items 1) and 4)	ED	<p>“...from underside.”</p> <p>The word “the” appears to be missing in both list items 1) and 4).</p>	“from the underside.”	
NFCC	—	12.1	List items 1), 2), 5) and 6)	GE/TE	<p>The comprehension of items 1), 2), 5) and 6) by users would be enhanced by the inclusion of figures illustrating the recommendations made, as well as the location of cavity barriers/fire stopping details.</p>	Consider including illustrative figures for these items.	

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NFCC	—	12.1	—	ED/TE	<p>“Minimum periods of fire resistance and measurement of escape distances for balconies and terraces are given in other standards and national regulation.”</p> <p>Reference should be made to regulatory guidance.</p>	<p>Proposed alternative text: “...are given in other standards, national regulations and regulatory guidance.”</p>	

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