

Wording & Structure of DAC Reports

Date; 20th June 2023

Location Athlone.

Presenter; Martin Ryan Assistant Chief Fire Officer (Building Control)
Cork County Fire & Building Control Dept.

Themes Covered

Wording & Structure of DAC Reports.

- ✓ Differing perspectives on DAC
 - Consultants and BCA
- ✓ Enforceability
 - why Accurate Wording is important in DAC Reports
- ✓ Bullet Point Focused Reports
 - Accessible Entrance door handles will be at 900mm above FFL
- ✓ Provisions Focused Reports
 - Which doors are the Accessible Entrances

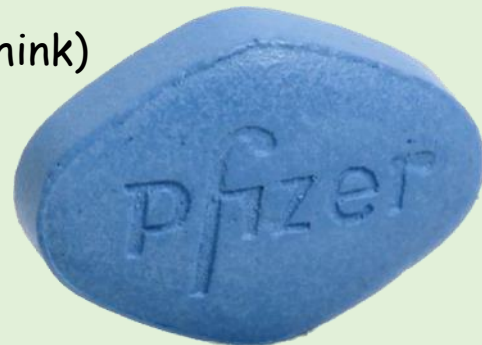


How comply with TGD Guidance - Limit myself to how to “Demonstrate Compliance”

Presentation cut down from series of 3 Presentations - normally taking 4 hours

What informed my Opinion on DAC

- 13 Years at DAC
- Minions
- A 10m² Porch
- 2-week holiday
- An Ice cream machine
- And (but not why you think)



What informed my Opinion on DAC

- 13 Years at DAC
- Minions
- A 10m² Porch
- 2-week holiday
- An Ice cream machine
- Major Chemical Plants



544 DAC granted - every sort of building

Supervised training on ~330 more DAC

1st & worst DAC application ever

returned to find 40 DAC on my desk

>100 DAC inspected on site - builders argue everything.

Pfizer, BioMarin, Jansen, GE, Novartis, Eli Lilly

- complicated applications - Zero M2010 dispensations.

DAC reports needed to be

- Easier to prepare & assess

- Wording must be enforceable.



Differing Perspectives

Mini Survey –

2 Main Complaints

2 Main Questions

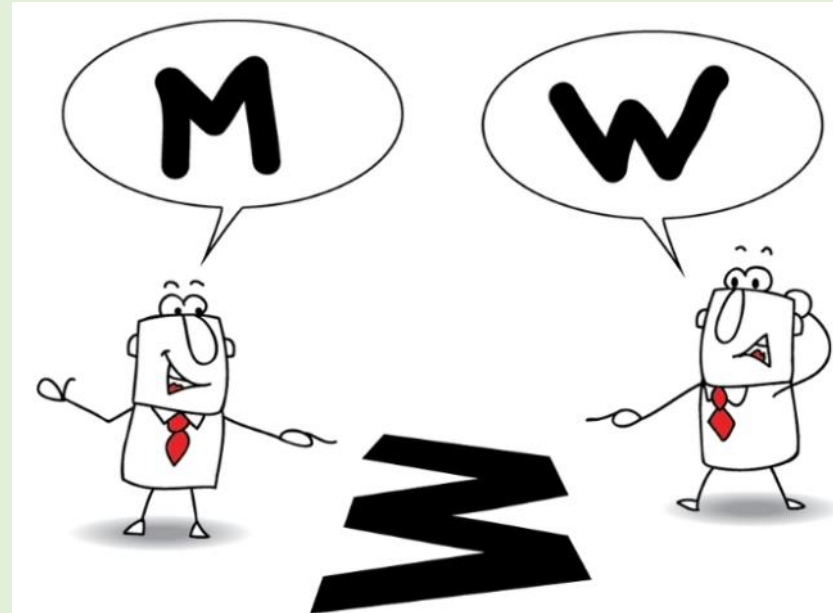
The 2 Main Complaints About DAC

- BCA**
- Consultants don't submit the information we need.
 - *Consultants all doing it their own way*

- Consultants** - What do Building Control want ??
- *BCA all looking for different things.*

A standardised approach would help greatly

Different Perspectives ?



The 2 main questions about DAC

Question 1

- What is a DAC ?

Question 2

- What actually is a DAC !!!

These are 2 very different questions !

Question 1 - What is a DAC ?

From DAC form in the Building Control Regulations (minor paraphrasing)

(BCA)hereby certifies that works to which the application relates, if constructed in accordance with the plans, specification and particulars submitted would comply with the Requirements of Part M.

Notes:

- It is a Certificate of Compliance
- Not an Opinion, an Outline approval or a "sure it seems okay"
- Certifies Compliance with the REQUIREMENTS of Part M - Not just with the TGD M

DAC – the best Ancillary Cert an Assigned Certifier can get →



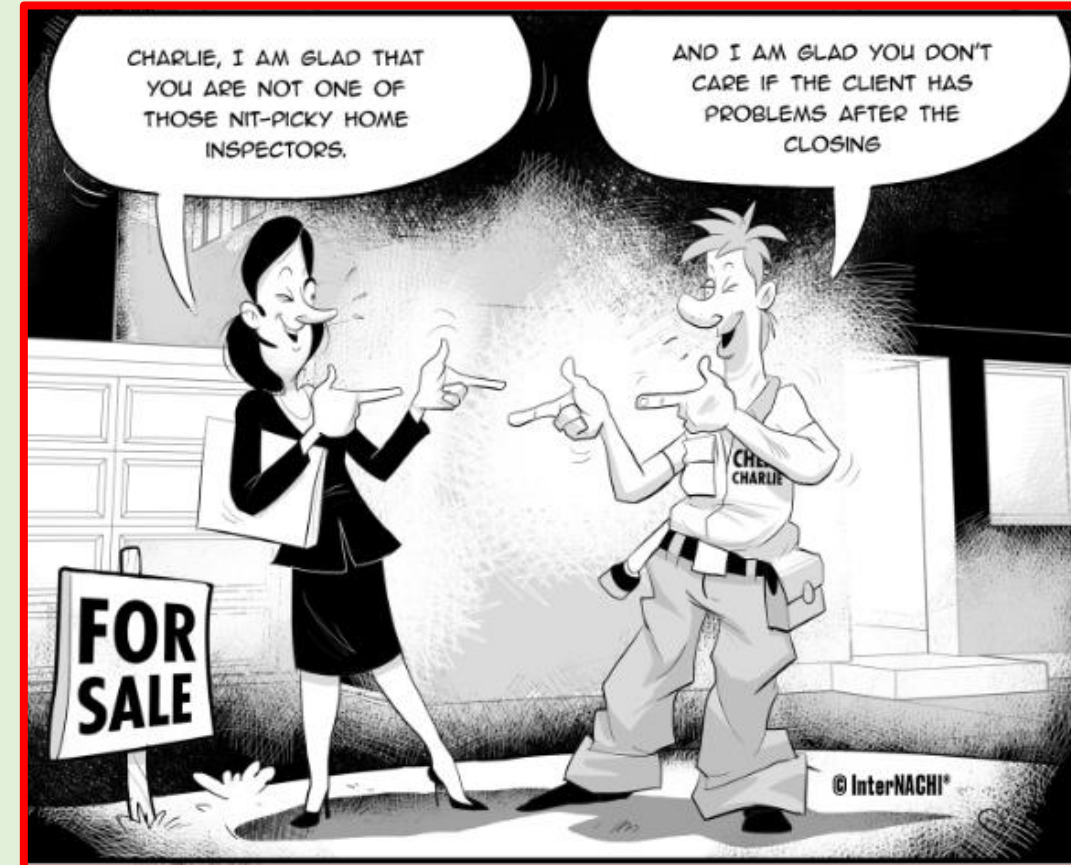
Question 1 - What if you grant a Bad DAC ?

It is a Certificate of compliance

- any 'errors' within it are now Certified as being compliant.

(the BCA can hardly argue against what they just certified)

Granting a poorly worded DAC is all well and good
.... until you try to enforce Part M onsite



BCA shouldn't accept a wording less enforceable than TGD M.

Because BCA must Certify - they require DAC report to be to a higher standard than Consultants

Question 2 – What actually is a DAC !!!

What are we supposed to be assessing ?

Concept check?

- *Is there a passenger lift ?*

Design check ?

- *Will the lift comply with Paragraph 1.3.4.2*

Details check ?

- *What is the height of the lift controls ??*

← FSC
DAC →

Rightly or wrongly – FSC reports tend towards “Concepts” & DAC reports tend more towards details. --why?

Question 2 - Why FSC & DAC reports differ.

- TGD B - Generally High level Guidance – fewer bullet points
- E.g. - Junction between wall & roof should be fire Resistant (30/60/90)
 - Fire Doors should comply with appendix B

- TGD M - lots of detailed guidance >350 bullet points in section 1 alone
- Detail Design - “Door handles should be 900mm above the floor”

DAC - Temptation to repeat all the bullet points

→ wouldn't dream of doing this in FSC

FSC - Wouldn't expect regurgitation of Appendix B to confirm number of fire door hinges.



Question 2 – What actually is a DAC !!!

Concept check?

- *Is there a passenger lift ?*

Design check ?

- *Will the lift comply with Paragraph 1.3.4.2*

Details check ?

- *What is the height of the lift Controls ??*

← FSC
DAC →

- *Answer – Needs to be a combination of all 3. -but how much fine details is required ?*
- *Consultant can submit report in any format they like – but it must contain enough Info to allow BCO to certify*
- *If report says lift will fully comply with 1.3.4.2 – does it really need to transcribe all 22 bullet points ?*

Summary : Different Perspectives on DAC

	Consultants	BCA
What is a DAC ?	a Proposal	a Certificate
Aim	Put in all you can think of	Have to find what's missing
Understanding	Working on job for months	1 st time seeing it
Compliance	Intends to Comply	Will have to deal with Builder
All the bullet points	A specification for the client	Some BCA want – others don't
Unclear wording in DAC	"I know what I meant"	Would it stand up in court ?
Omitted items	I'll sort that out onsite	Stuck with what's certified

Because BCA must Certify - they require DAC report to be to a higher standard than Consultants

DAC Templates

A means to achieving a Consistent Approach to DAC

Thought of the Day

If the Consultant is not using YOUR template

You are using THEIR template.

Consultants don't write a DAC from scratch, they work from some version of their own template

What is a DAC Template ?

- a framework onto which you hang the “*application specific*” information.

1) Put the “*always the same*” text into the template - *TGD M references etc.*

→ *Saves you having to re-type the same info every application*

2) Provide Space to enter the ‘**Application Specific Information**’

****Can't just add cover sheet to template and submit ****

You must enter the Application Specific information.

Makeup of TGD M Guidance

Bullet Details.

- Heights of door handles on Accessible Entrances. (900-1100mm)
- Height of sink in accessible WC (Fixed guidance - always 720mm-740mm)
- Height of handrails to steps (Fixed guidance – always 900mm – 1100mm)

Mostly fixed guidance

Provisions

- Which entrances are the Accessible entrances ?
- Are the WC to Diagram 15a or 15b ?
- Is it okay to have steps on Access Route B or not ?

(variable)

Which is it more important to Assess ??

Main Formats of DAC Reports

1) Bullet Point Templates

- Most Consultant created their own version. (Lots of borrowing)
- Bullet points – re-quotes many of ~350 TGD M bullets
- Provisions - hit or miss attention (vary from excellent to poor)

Focus on the fixed
bullet points

2) Provisions Templates

- LGMSB format & Cork CoCo format
- Bullet Points - only needed as case arises (*variables/deviations*)
- Provisions - main focus of the Template.

Focus on the
variable Provisions

Main Concept Difference Between Templates

If they state that the Accessible stairs will comply with Paragraph 1.3.4.3 of TGD M 2010

→ do they really need to re-quote all 16 fixed bullet points ???????

Fire Cert - wouldn't seek confirmation of number of hinges in a Fire Door.



Provisions Templates tend to only address Bullets Points where -

- *Variables* - e.g., Rise & Going of the steps, Width of Entrance)
- *Deviation from the TGD* - Existing buildings ?

If you spend all your energy on the Bullet points – then focus on the provisions & variables usually suffers

If you really want all the Bullet Points in the DAC ??

DAC never intended to be a “works specification” for clients.
- It is a statutory process. FSC not treated that way



+



= Job Done ✓

If DAC report just regurgitates all the fixed TGD M bullet points

→ are you mostly proof-reading it rather than assessing it ?

Consultants don't re write out all the bullet points afresh every application – they use their template,

Common Problems in Bullet point Formats

***** Disclaimer *****

Some versions are way better than others

Talking about the Principal of focusing on Bullet Points formats vrs Provisions Formats

Bullet Points Formats

Most common format nationally

- Consultants created their own versions (or salvaged bits) - *many variations*
- Focuses on regurgitating hundreds of bullet points - *so that the client has them*
- Most bullet points don't change from one application to next. - *e.g. height of door handles*

Problems

- Wording – frequently weaker than TGD - *more wriggle room to argue*
- Vulnerable to typos, omissions & cut/copy/paste errors
- Frequently Provisions & Variables are overlooked ** - *Is the Staff door also an Accessible Entrances???*

** **Disclaimer** – Some templates are way better than others at dealing with 'Provisions' than others.

Why Wording of Reports Matters



- *Weak wording is open to (mis)interpretation*
- *Less Enforceable*
- *Less accurate*
- *More Ambiguous*
- *Lets Builders argue the toss*

→ ***Weaker than the TGD***

If you have to CERTIFY compliance – don't accept a wording less enforceable than TGD M

Wriggle Room



Manifestation will be provided to fully glazed doors

-what about the screens ?

A builder actually tried to argue this was okay because the screen was not "full glazed"

Confusing Wording

Compliant ??

*"The rise of the steps
won't be not less than
150mm....."*



What Consultant meant and what they wrote not always the same.

BCA has to CERTIFY what is written – not what was intended. (higher standard)

Weak Wording

"The internal doors will in general comply with the provisions of 1.3.3.2"

Generally **X**

Avoided **X**

Where practicable **X**

- *Will some doors not comply ?*
- *Which door elements won't comply ? Why ??*

If something is going to deviate from the TGD – tell me what it is (and why) - so that it can be Assessed.

DAC Phrase	Builder's excuse
<i>"will generally comply"</i>	<i>"this is one of the ones that won't"</i>
<i>Will comply where practicable</i>	<i>Ah! ...but it's <u>not</u> practicable here</i>

Caveats



"Adequate colour contrast shall be provided to the painted surfaces"

... I don't think this is what TGD M says ?

What about the non-painted surfaces ?

Will they have adequate colour contrast too?

Yes, it's a silly argument ..BUT !It is one that builders might make to avoid remedial works

Unintended Omissions

“The doors will be glazed doors and therefore vision panels will not be provided”

- but will the glass be transparent ?

What Consultant meant and what they wrote not always the same.

BCA has to CERTIFY what is written – not what was intended.



Miss Quoting all the bullet points



Ironmongery will be usable with one hand

Is the really what 1.2.4.2(c) says ?

*If the report includes all 350 bullet points
- you have to proof read them all*

Wheelchair Mindset



"The entrance D01 will be accessible to wheelchair users"

- Great but what about other users ?

What about provisions for people with other impairments (sight, hearing ?)

Glazing manifestation ?

Not as compliant as it seems

The ramps providing access from the North will be constructed in accordance with Paragraph 1.1.3.4 of TGD M as follows:

- (a) Slopes and landings will have a clear width of 1.2m
- (b) The gradients will not exceed 1 in 20 & 9m long
- (c) The landings will be at least 1m in length
- (d) Edge protection will not be provided
- (e) The top landing will be at least 1.8m²

Not as compliant as it seems

1 of the ramps is on the east – will it comply ??

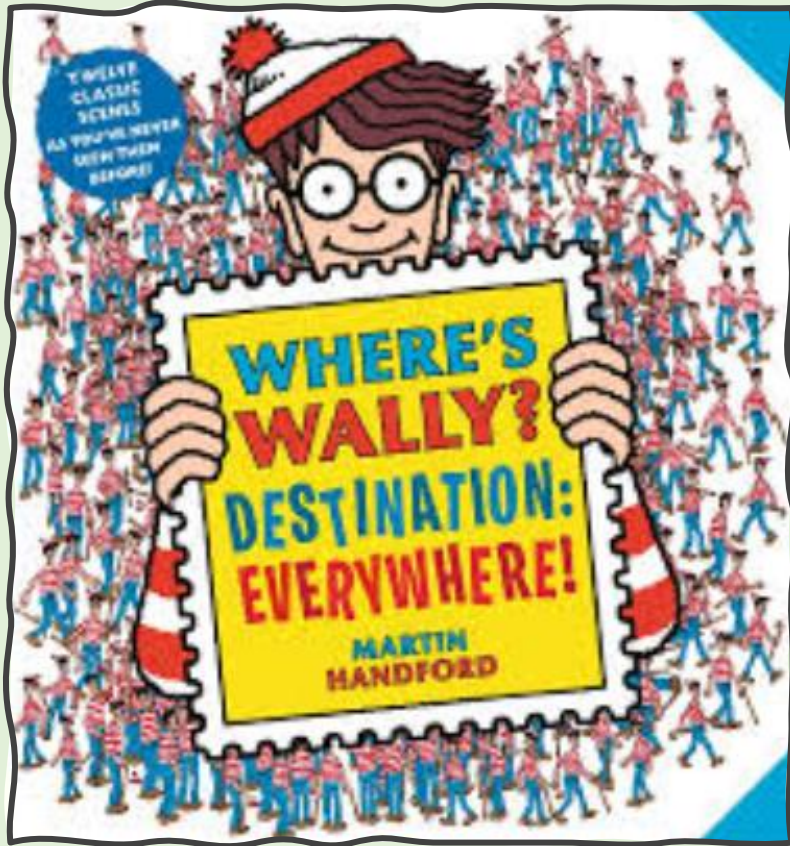
The ramps providing access from the North will be constructed in accordance with Paragraph 1.1.3.4 of TGD M as follows:

← So will it comply with 1.1.3.4or will it only comply “as follows”

- (a) Slopes and landings will have a clear width of 1.2m
- (b) The gradients will not exceed 1 in 20 & 9m long
 - Is “exceed” 1/20 shallower or steeper
- (c) The landings will be at least 1m in length
 - only 1m ? - needs to be at least 1.2m?
- (d) Edge protection will not be provided
 - why not ??
- (e) The top landing will be at least 1.8m²
 - 1.8m² ≠ 1.8x1.8

What about all the other bullet point items from TGD M ?? - “as follows” above undermines

Spot the Missing Bullet Point Game



The lift will comply with the following bullet points of Paragraph 1.3.4.2

- (p) (L) (b)
 (a) (e) (f) (o)
 (n)
 (h) (d) (k) (c) (m)
 (j)

Another danger of re-quoting dozens of bullet points - Are any missing ?? – and why ?

Not Resolving Variables

“Vision panels will not be provided to doors to rooms where privacy or security are required.”

- Who decides which doors this applies to?
- Arguments on site with Builder ?
- This should be assessed and decided in the DAC

Are you only proof reading the bullet points - rather than actually assessing the design?



Vulnerable To Mistakes - Intermixing Information

The accessible entrance door ED01 on the North facade will be in accordance with paragraph 1.2.4 of TGD M2010. It will be a 800mm wide power operated door and will be in accordance with paragraph 1.2.4.3 of TGD M2010.

Red = template /
TGD-M reference

Blue = application
specific information

Risks

- Typos, miss-reference & Cut-Copy-Paste errors
- Provisions beyond the 1st frequently forgotten - what about the staff entrance ED02 on the **East** side ?

The Howlers

“Loose mats in entrance lobbies are a notorious trip hazard and therefore they **will** be provided”

“light switches will be installed 90mm above floor level”

The danger of trying to transcribe lots of technical information

Non-Committal

“Universal design recommends visual contrast between building elements (e.g between walls & floors, doors & walls, controls)”

- Sounds wonderful.. ... I know what the Consultant meant BUT !!!
 - Did they actually commit to actually providing it ????

What a Consultant meant - and what they actually wrote aren't always the same thing

Summary : Disadvantages of Bullet Point Templates.

- Greater risk of typos & errors *- proof read hundreds of bullets !*
- Wording often less enforceable than TGD M
- Provisions/Variables often suffer (esp. beyond 1st item)
 - which entrances are the accessible ones ?*
 - ramps provided without justification*
- Wouldn't ask for such detailed bullets as FSC
 - Wouldn't expect to confirm No. of hinges in a fire door !*
 - Wouldn't ask for screw length & spacings in a plasterboard wall*



Can't see the wood for the trees

– If you focused on the fixed bullet points – did assessment of the Provision suffer ??

Provisions templates

A sample-based approach to applying for a Disability Access Certificate



An Bord Seirbhíis Bainistíochta Rialtais Áitiúil
Local Government Management Services Board
23 November 2011 – Version 1

LGMSB: a sample-based approach to applying for a Disability Access Certificate

Page 1 of 51

LGMSB format

“sample based approach to applying for a disability access certificate”

Possible Format for the layout of a DAC application

- Part M 2010 -

This document should only be used with the clear understanding of the following:

- The aim of this document is to illustrate one possible **format** for the **layout** of a DAC application to Part M 2010. Other formats such as that produced by the Local Government Management Service Board (www.LGMSB.ie) are available.
- It should in no way be taken as a full specification on how to comply with the Requirements of Part M of the Building Regulations.
- This sample format cannot possibly cover all eventualities which may arise for actual buildings.
- The information provided under the 'Particular Information' headings is provided to illustrate how the information might be presented.

As Revised: 27th June 2013

Recent changes highlighted in RED

(short example version)

Created by: Martin Ryan & Niall Whelton,
Cork County Fire and Building Control Department.

Page 1 of 16

Cork Co.Co. format

“Possible Format for M2010 DAC”

Because you don't need hundreds of Bullet points.....

1. Lets you Focus on What is important –

- Identify Provisions - are all the required Entrances accessible?
- Clarify Variables in TGD - Is there a vision panel on the entrance door ?
- Highlight deviations - Why is stairs only 900mm wide ?
- Dealing with complications - particularly for existing buildings.

2. Enforceability

- Less proof reading of Bullet Points transcribed from TGD
- Compliance references in set out properly in the template parts

*Key difference from
bullet point
templates –*

*If they state the
Accessible stairs will
comply with
Paragraph 1.3.4.3 of
TGD M*

*- do they really need
to transcribe out all
16 bullet points
??????*

**** If you spend all your energy on proof-reading the Bullet points – then focus on the provisions suffers ****




Comparison of LGMSB & Cork Templates

If they state the Accessible stairs will comply with Paragraph 1.3.4.3 of TGD M

- do they really need to transcribe out all 16 bullet points ??????

All you really want to know is –

- Which stairs*
- Any deviations from TGD*
- Check drawings ***

	LGMSB	Cork CoCo.
Main Focus	Provisions	Provisions
Details Compliance by	TGD M paragraphs	TGD M Section 
Structure	Part to Whole	Whole to Part 
Template vrs Application info	Intermixed	Deliberately Separated 
Bullet Points	Few / None	Key Bullets included (~15)
TGD variables <i>(vision panels etc)</i>	Not in template	Pinned Down

Disadvantage of “Part-to-the-whole”

A summary of the different routes are tabled below:

Route	From	To	Level / Gently Sloping/ Ramped	Gradient
Approach Route A	Site entrance	Parking/ Set- Down Area	Gently Sloping	Varies
Approach Route B	From Set- Down Area/ Disabled Parking	Main Entrance	Level/ Gently Sloping	1:60- 1:30
Approach Route C	Coach set down	Main Entrance	Level/ Gently Sloping	Level- 1:30

Extracts from LGMSB

- *Route A not “noted above” as having any level sections !*
- *Surely it has to include some level sections ?*
- *Have they committed to complying?*

1.1.2 Level Access Routes [1.1.3.2] & [2.1.3.2]

All level access routes, noted above, will be in conformance with the guidance described in TGD Part M 2010 Section 1.1.3.2.

Does not arise in Cork format as starting point is “Everything Complies” - This cuts down on “Errors by Omission”

Advantage of Separating Information

1.4 On-site Car Parking [1.1.5] & [2.1.5]

Two designated car parking spaces will be provided for those with disabled parking permits, the equivalent of 10% of the available parking spaces. On-site car parking will be in conformance with the guidance described in *TGD Part M 2010 Section 1.1.5* and *Diagrams 8 & 9*. Refer to DAC 05 for the locations of designated car parking, ground markings, associated street furniture and connection to the accessible access route. This drawing also notes the overall dimensions of the spaces, the appropriate levels and type of car park space provided.

LGMSB Template

- *Template & application info intermixed.*
- *re-use errors likely*

Section 1.1 Approach to building.

The provision and design of access routes will be in accordance with section 1.1 of TGD M2010.

1.1.6 On site Set down areas.

- a) A set down parking area has been provided adjacent to the designated parking spaces. It is located within 6m of the main entrance ED01.

Cork Template

- *Application specific info separated*
- *Cut-Copy-Paste errors rare*

Cork CoCo DAC format

M2010 format

- in use since application of M2010 in 2012.

- Used by all local consultants for +10 years
 - Adopted by most **regular** out-of-county consultants
 - Format used for > 90% of all DAC received
 - Addendum for Flats & Industrial production floors
 - **Specifically designed to be Enforceable onsite.**
- 3 Presentations days held for consultants
- many complain its not accepted in their county.
- cut way down on workload & grief for all

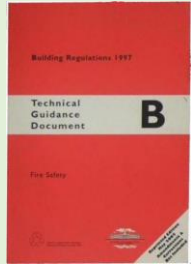
Advantages for Consultants - Consistency, know exactly what we expect. (makes applying easier)

- Helps them to provide the information we require.

**** Consultants perfectly entitled to use their own template ****

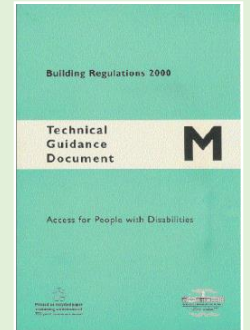
Most convert to Cork template once we start asking questions like "Which routes are the Access Routes ??"

Cork Template - Concept



Unlike TGD B there are no Purpose Groups.

The same guidance always applies.



The “*always the same*” information & TGD M compliance statements can be set out properly in the template sections

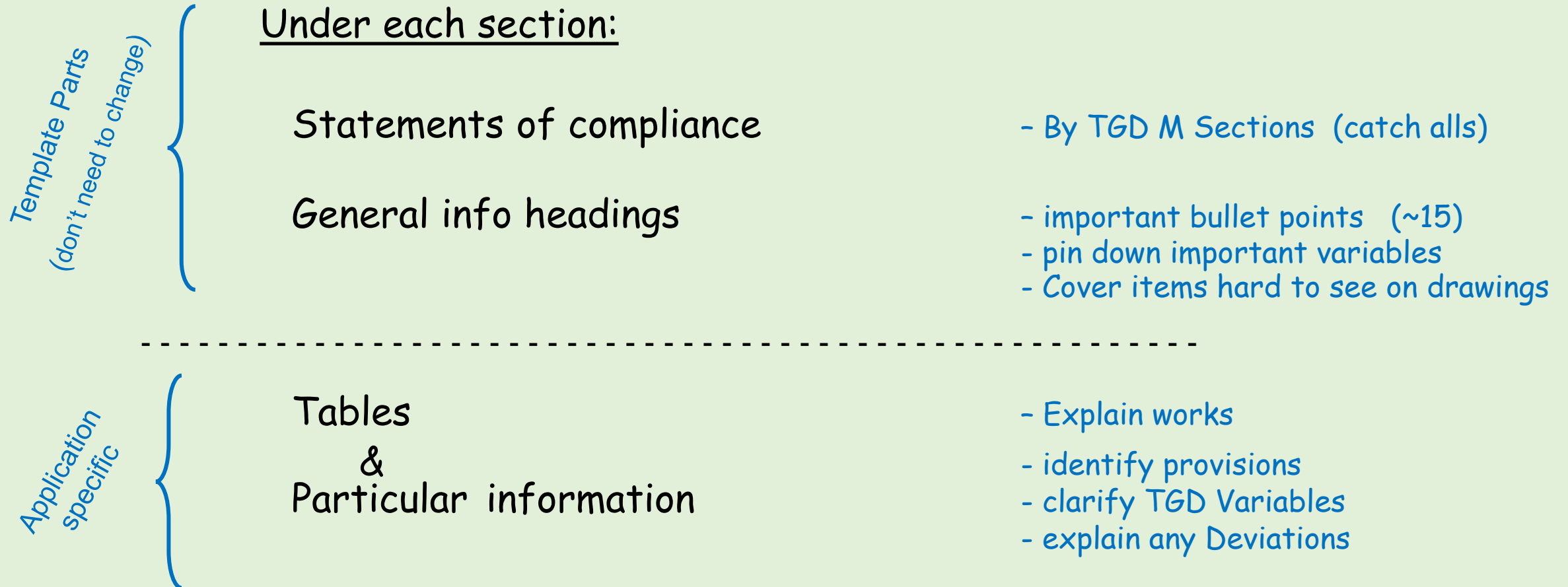
(do it once and get it right – eliminates a host of possible errors)

Then – Space provided for consultant to describe the “**Application specific Information**”

– easier to enter required information as no longer burdened with transcribing technical references

(explanations - Provisions – variables – any deviations from TGD)

Template Structure



**** to prevent errors - ALWAYS keep Template items separate from application specific information ****

Format Rules

1. Identify all Provisions *- which entrances are the “Accessible Entrances” ?*
 3. Clarify Variables from TGD *- door widths, vision panels, are there steps ?*
 4. Explain any Deviations from TGD *- rather than leaving me to find them*
 5. Don't blanket reference Section 2 *- which backstop variables apply? Why?*
-
6. Resist temptation to edit the template sections *- They are always true – so why edit!.
Editing causes = Errors & Caveats*
 7. Only write in the GREY sections & tables. *- these are the “particular Information” areas
Writing into the “template” sections causes errors & caveats*

The template only takes care of the technical reference & provides a framework for the application specific information.

*It does **NOT** write the application for you. - Applicant MUST properly description their provision and detail/explain any deviations from TGD M*

Particular Information Headings & Tables

Structured to help enter the “*Application Specific Information*”

(the GREY sections of the template)

- What are your provisions ?
- *Describe in plain English – template took care of the technical references.*
- Clarify the TGD variable items
- *E.g. vision panels & door widths. Why did you need Steps on Route A ?*
- What can't you do
- *justify* - *Can't provide leading edge to Door 5 – so it will be a powered door.*
- What don't you want to do
- *justify*
- What is existing & not to Section 1
- *justify & describe*
- Section 2 back stop values
- *justify & describe*

Only write in the GREY sections & tables

**** the template is only a framework – they have to fill in the application specific info ****

Typical Format

Statement of Compliance →
(should always be true)

Section 1.3 Circulation within the building

Circulation within the building will be in accordance with section 1.3 of TGD M2010.

- a) Horizontal features will be in accordance with paragraph 1.3.3 of TGD M2010.
- b) Vertical features will be in accordance with paragraph 1.3.4 of TGD M2010.

Template Bullets →

- important reminder as hard
to check on drawings

1.3.1 General Information

- a) All corridors and passageways will have a clear unobstructed width of at least 1200mm. Elements such as columns, radiators, fire hoses etc. will not project into this width.

Application Specific Info →

Entered by Applicant

1.3.3.3 Corridors and passageways - Particular Information

- a) The dead end corridor leading to the staff room is less than 1.8m wide. As shown on the drawings, a passing place is provided at the door.

Typical Format – Dealing with Accessible Entrances

Template / Generic

Statement of Compliance →

(should always be true)

No need to edit !!!!

Section 1.2 Access to the Building

The provision and design of access to the building will be in accordance with section 1.2 of TGD M2010.

- a) The design of accessible entrances will be in accordance with paragraph 1.2.3 of TGD M2010.
- b) The design of accessible entrance doors will be in accordance with paragraph 1.2.4 of TGD M2010.

Application Specific

Accessible Entrances Identified →

Also addresses the variables

(Width & Vision panels)

Any extra Application Info. →

1.2.2 Identification of accessible entrances

Accessible Entrances	Minimum Effective clear width (mm)	Vision Panels	comment
ED 01	1000	Yes	Main Entrance
ED 02	1000	Yes	Access to courtyard
ED 03	1000	Yes	Access to waterwheel
ED 04	800	No	Fire Exit only

1.2.4 Accessible Entrance Doors - Particular Information

ED01 will be constructed as a power operated door

Comparison to typical “bullet Point” template

The accessible entrance door ED01 on the North facade will be in accordance with paragraph 1.2.4 of TGD M2010. It will be a 800mm wide power operated door and will be in accordance with paragraph 1.2.4.3 of TGD M2010.

Red = template /
TGD-M reference

Blue = application
specific information

- *Typos & Errors* - more likely as TGD references have to be re written every application.
- *Caveats* - in this case compliance with TGD M only applies to ED01 on the North (what about others)
- *Less User friendly* - harder to add reference to additional other entrances are to be made Accessible

Section 1.1 Access Routes

Carefully designed to get all the Key information - with no ambiguity

- *Tables to identify all Access Routes*
 - *start & end point. Check all required routes covered ***
 - *to try to identify unnecessary steps/ramps*
 - *must be identified & justified so BCO can assess.*
 - *other information about each route*
- *“Max level difference”*
- *Ramps & Steps (key variables)*
- *“Particular Information”*

Drawings -

Route must be shown with a line

Routes dealt with as a whole.

Rather than as separate parts

(level, sloped, ramped & stepped)

Access route D -

New access route from ED02 to the existing grain store

		Comment	identification
Max level difference	550 mm	Intermediate landing	
Minimum Width	1500 mm	2 Passing places provided	
Maximum Gradient	1:21	2 Gently sloping flights	
Steps on route?	No		

- As the rise of the gently sloping section exceeds 500mm an intermediate landing has been provided. See drawings.

Example – Why did we ask for “max level difference”

Proposal -

“Wheelchair access not possible
due to difference in level”

TGD M provides guidance on steps
if you cant provide a ramp

... but ...

Why was the building put on blocks
so high ?

Lower it and provide a gentle slope



The danger of “all the bullet points” formats - is that consideration of the actual Provisions suffers

Wording – Precise & Carefully Selected

1.3.3.2 Internal doors - Particular information

- a) Where vertical pull handles are provided, the bottom of the available grip zone will be between 700mm and 1000mm above finished floor level. The top of the grip zone will be at least 1300mm above finished floor level.
- b) Vision panels will be provided to all doors other than those leading directly to sanitary facilities and **closets**, except where listed here:
 - No exemptions.

Format Rule -
Only Edit the
GREY bits

Item (a) - Added for clarification

- wording in TGD M very obscure

Item (b) - Vision Panels are a variable

- this pins down any doors that won't have a Vision panel

"Closets" deliberately chosen

- A closet is small. A "store" could be anything → up to "Dunnes Stores"

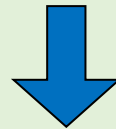
Wording chosen to maximise Enforceability and clarity (don't edit the template bits)

Dealing with Section 2

Must comply with Section 1 unless not 'practicable'



If not, explain & comply with section 2 backstops



If can't comply with section 2, explain and
provide alternatives

If you only directly Reference Section 2, then I don't know what you are claiming is/is not practicable

DON'T edit the template sections to reference Section 2 instead

Example of “Particular Information” dealing with Section 2

1.2.4 Accessible Entrance Doors - Particular Information

- a) The existing 700mm door at ED-02 is between two structural columns and it is not practicable to provide a 1,000mm door. A new 850mm wide door will be provided by removing the existing side panels. This width is considered acceptable in accordance with Para 2.2.4 of TGD M 2010.
- b) At ED-03 the existing double doors will be replaced with a single 1,000mm wide door. To achieve this clear width it is necessary to reduce the leading edge to less than 300mm. In compensation this door will be constructed as a power operated door.

- *Explain why it is not practicable to comply with Section 1*
- *Describe what is actually being proposed & Justify - provide compensating features if necessary*
- *Reference Section 2 for the specific element only.*

Designed to assist the drawings

1.4.2 General information

- a) All sanitary facilities are clearly identified and annotated in the drawings.
- b) The provision and exact position of all new features within the sanitary facilities (e.g. grab rails, sink, alarms) will be in accordance with section 1.4 of TGD M2010 including diagrams unless specifically highlighted here:
 - No exemptions

- f) Small items (e.g. bollards or signposts) can be difficult to identify on scaled drawings. All access routes will be free from hazards and obstructions and will be in accordance with TGD M2010, except where clearly highlighted and labelled on the drawings and listed [here](#) :

Not reasonable to expect to check height of soap dispenser on drawings

*Shouldn't need a microscope to check drawings
@1:200 a 90mm bollard would only be 0.45mm*

DAC Drawings

- Must support the report (not just reuse FSC dwg)
- External Areas must be shown on G/F plan
- Dimensions & Sufficient level of detail

Key Information -

- Identify the Access Routes - *to-from*
- Corridors - *widths & turning circles*
- WC layout - *size, toilet, sink, alarm*
- Stairs - *Rise & Going*



Conclusions

- Building Control** - It's a CERTIFICATE - Don't accept anything less enforceable than TGD M
- Consultants** - If you think the BCO is being picky, remember they have to Certify.
- Wording** - Do sentences actually mean what you thought they did ?
- Enforceability** - Is poor wording leaving wriggle room for builders? - must proof-read every bullet !
- Bullet Points** - Is putting them all in DAC distracting from more important assessments ?
- Provisions** - Are they covered properly *E.G - Was an Access Route provided to school playground ?*
- TGD Variables** - Are they clarified ? *E.g. Vision panels - where do "privacy or security reasons" applied*
- Deviations** - if you don't explain why XYZ had to deviate from TGD M - BCA can't agree with you.
- Templates** - Consider adopting a good template - it can significantly cut down on workload & grief

Wording & Structure of DAC Reports

Date; 20th June 2023

Location Athlone.

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Cork County Fire & Building Control Dept.