Response 15

Page 1: Question 1

b. Should the ban be implemented through changes to the Building Regulations (i.e through legislation rather than the Approved Documents)?

Yes

c. If no, how else could the ban be achieved?

legislation should be robust enough and policed by competent professional and building control so as not to put a ban in place. A system needs to be put in place where specifications, standards and compliance with legislation governs what materials and systems are used rather than price: price and price. CDM regulations and design responsibility need to be tighter, too often there are multiple people responsible for individual aspects with on one being in overall control. BIM could be a driver if and only if the pathway for information goes to the operatives installing the products rather than it just being a "nice tool for the design team", or a "tool to lock in my product protectionism scheme"

Page 2: Question 2

a. to buildings 18m or over in height?

No

b. If no, to what height, higher or lower, should the ban apply? Explain why

No
Comments:
It does not matter how low or high the building is getting people out safely is dependant upon the fabric of the building at all levels. The problem with stipulating an height is that combustible materials are then used as a cheap alternative at lower levels, so if there is a fire in the lower levels you can be trapped in the higher levels. The distance from the boundary and location of slopes vegetation car parks and other mad made and natural obstacles can prevent full access to the full perimeter of the building therefore assuming that the fire can be put out easily up to 18m is incredible unrealistic and dangerous assumption.

c. throughout the entire height of the wall, i.e. both below and above 18m?

Yes

d. to high-rise residential buildings only?

No

e. If no, should the ban apply to high-rise non-residential buildings e.g. offices and other buildings, as well as residential buildings?

Yes

f. Please provide any further information in relation to your answers above

f. Please provide any further information in relation to your answers above

It does not matter how low or high the building is getting people out safely is dependant upon the fabric of the building at all levels. The problem with stipulating an height is that combustible materials are then used as a cheap alternative at lower levels, so if there is a fire in the lower levels you can be trapped in the higher levels.
The distance from the boundary and location of slopes vegetation car parks and other mad made and natural obstacles can prevent full access to the full perimeter of the building therefore assuming that the fire can be put out easily up to 18m is incredible unrealistic and dangerous assumption. If anyone is in the building then priority is to get them out and safe no mater what the building is used for or how high. Restricting it to 18m has been a dangerous practice especially where residentials, schools, hospitals, offices and student accommodation is concerned. We have had the attitude that if we can get access to the building by the fire brigade then we can make it out of whatever we want.

Page 3: Question 3

a. Do you agree that the European classification system should be used?

No

b. If yes, do you consider that Class A2 or better is the correct classification for materials to be used in wall construction?

No

c. If no, what class should be allowed in wall construction and why?

Do you actually know what class A2 means? Do you know which European standard you are referring too with regards classification? Do you know how many different UK and European standards on product fire classification there are and also American ASTM and other standards? Products are used from all over the world and yet the understanding of hundreds of standards is required with in-depth knowledge of how they are tested to be able to understand what is being specified and how it and the materials used with it react. Therefore you cannot specify one route or the other as a range of documentation and understanding is required. Unfortunately so called professionals within the construction industry do not have sufficient knowledge or understanding to competently specify the full range of materials and standards that they should comply with. This needs to change starting with building control, and legislators.

Page 4: Question 4

b. If no, what aspects of the wall should it cover?

see my previous answers. legislation and competency as well as effective policing and control so that compliance can be checked by independent professionals rather than the contractor or the QS trying to save a bob or two.
The whole system needs to be looked at and until that is done this banning materials will be a shortfall in correcting the quality of construction within the UK.

d. Please provide any further information in relation to your answers above

The building should be safe in the event of a fire. Are you saying that the cladding that is combustible should be banned but plastic and wooden windows can still be used. There can be loopholes in banning selective products or systems or types you can only control what is built by good legislation, standards and correct policing to ensure compliance. Banning is not a substitute, and it should not be seen as a quick way of resolving a solution. This in my opinion is a very weak and dangerous approach.

Page 5: Question 5

b. If yes, what components should be included on an exemption list and what conditions should be imposed on their use?

same answer as before. AND: Do you know what you are banning and if so do you know what will replace it and what issues you will be adding to construction in doing so.
Do you ban cars because they have a tank with combustible petrol in it?

c. If no, what alternative way of achieving the policy aims would you suggest?

legislation and policing to ensure compliance. Remove "Design and Build contracts" as these can lead to changes in design to save costs and make more money.

Page 6: Question 6

e. Please provide any further information in relation to your answers above

Legislation, design and compliance is required. Banning is a tool that shows you have reacted and done something without actually resolving the problem. Hard drugs are banned but they are still used. What does a ban really mean?

Page 7: Question 7

a. Which wall elements are likely to be affected by the proposed change – i.e. where they would pass as part of a cladding system in a BS 8414 test but would not meet the proposed Class A2 or better requirement (e.g. sheathing boards or vapour barriers)?

BS 8414 is unsuitable to test a wall as it does not take into account the full structure, windows, door, services going in and through the building, fire from outside or fire the inside. It is not fit for purpose and should be withdrawn and replaced.
Again do you know what A2 means and what products this standard applies too and what products it does not?
Just because a packet of fish fingers says Fish, it doesn't tell you what fish it is where is was caught and if its sustainable and environmentally friendly. You are looking an only one tiny aspect and not holistically at products and construction.

c. What is the impact of removing access to the BS 8414 for those buildings affected by the ban test likely to be?

see previous comments

d. How much extra cost would typically be involved in meeting the proposed new requirements (for buildings 18m or over) against a building which meets the current requirements? (Please provide any further details)

Lives is what it costs, not monetary objectives lives. I cant believe your asking this question.....

Page 8: Question 8

We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

see my numerous answers which will indicate my concerns .

Page 9: Submit your response

You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name	[redacted]
Position (if applicable)	[redacted]
Organisation (if applicable)	[redacted]
Address (including postcode)	[redacted]
Email address	[redacted]
Telephone number	[redacted]
Please state whether you are responding on behalf of yourself or the organisation stated above	[redacted]

Please indicate whether you are applying to this consultation as:

-

If you want to receive a receipt of your response, please provide an email address. Email address

Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

Keep my response anonymous

Response 16

Page 1: Question 1

a. Do you agree that combustible materials in cladding systems should be banned?

Yes

b. Should the ban be implemented through changes to the Building Regulations (i.e through legislation rather than the Approved Documents)?

Yes

Page 2: Question 2

a. to buildings 18m or over in height?

Yes

b. If no, to what height, higher or lower, should the ban apply? Explain why

Don't know

c. throughout the entire height of the wall, i.e. both below and above 18m?

Yes

d. to high-rise residential buildings only?

No

e. If no, should the ban apply to high-rise non-residential buildings e.g. offices and other buildings, as well as residential buildings?

Yes

f. Please provide any further information in relation to your answers above

The MWWFRS considers that a ban on the use of combustible / limited combustibility wall systems should include all purpose groups to ensure the future-proofing of buildings should the purpose group change.

Page 3: Question 3

a. Do you agree that the European classification system should be used?

Yes

b. If yes, do you consider that Class A2 or better is the correct classification for materials to be used in wall construction?

Yes

c. If no, what class should be allowed in wall construction and why?

The MWWFRS considers the use of Class A1 materials to be the appropriate classification for use on HRRBs.

Page 4: Question 4

a. Do you agree that a ban should cover the entire wall construction?

Yes

b. If no, what aspects of the wall should it cover?

N/A

c. Should a ban also cover window spandrels, balconies, brise soleil and similar building elements?

Yes

d. Please provide any further information in relation to your answers above

The MWWFRS believes the ban should cover all external elements.

Page 5: Question 5

a. Do you agree that a limited number of wall system components should, by exception, be exempted from the proposed ban?

No

c. If no, what alternative way of achieving the policy aims would you suggest?

The MWWFRS considers that the use of exemptions can allow for undesirable combustible wall system components to “creep” into use. However, when potentially exempted elements are considered as components of the entire wall system their inclusion must not allow for a disproportionate risk to be incorporated into the system, that impacts on the wall system’s ability to pass the relevant test.

Page 6: Question 6

a. the ban should apply to proposed material alterations to existing buildings, including over-cladding?

Yes

b. the ban should extend to projects that have been notified before the ban takes effect but work has not begun on site?

b. the ban should extend to projects that have been notified before the ban takes effect but work has not begun on site?

Yes

c. the ban should not affect projects where building work has already begun on site?

No

e. Please provide any further information in relation to your answers above

No, the MWWFRS disagrees. The ban on the use of combustible materials in wall systems should apply even if work has begun

Page 7: Question 7

a. Which wall elements are likely to be affected by the proposed change – i.e. where they would pass as part of a cladding system in a BS 8414 test but would not meet the proposed Class A2 or better requirement (e.g. sheathing boards or vapour barriers)?

The MWWFRS considers that the ban should extend to the use of combustible materials used in wall systems.

b. In England there are suggestions that since the Grenfell Tower fire, a high proportion of relevant building work is already using elements which meet Class A2 or better. What is your experience?

The MWWFRS has no direct experience of this.

c. What is the impact of removing access to the BS 8414 for those buildings affected by the ban test likely to be?

The MWWFRS considers that this will lead to safer buildings. The MWWFRS considers that even where a wall system is constructed using Class A1 or A2 products the wall system should still be subjected to fire-testing using the appropriate test.

d. How much extra cost would typically be involved in meeting the proposed new requirements (for buildings 18m or over) against a building which meets the current requirements? (Please provide any further details)

The MWWFRS has no direct experience of this on which to base an opinion

e. Please provide any further comments on the likely impact of this change for construction e.g. supply chains

The MWWFRS has no direct experience of this on which to base an opinion

Page 8: Question 8

We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:
N/A

Page 9: Submit your response

You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.	
Name	David Hancock
Position (if applicable)	Head of Business Fire Safety
Organisation (if applicable)	Mid and West Wales Fire and Rescue Service
Address (including postcode)	Lime Grove Avenue, Carmarthen, SA31 1SP
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Please state whether you are responding on behalf of yourself or the organisation stated above	Organisation

Please indicate whether you are applying to this consultation as:
Fire and Rescue Authority representative

If you want to receive a receipt of your response, please provide an email address. Email address
d.hancock@mawwfire.gov.uk

Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

Response 17

Page 1: Question 1

a. Do you agree that combustible materials in cladding systems should be banned?

No

b. Should the ban be implemented through changes to the Building Regulations (i.e through legislation rather than the Approved Documents)?

Yes

Page 2: Question 2

a. to buildings 18m or over in height?

Yes

b. If no, to what height, higher or lower, should the ban apply? Explain why

Comments:
If a ban is to apply then in accordance with the height mentioned in the Building Regulations whether 18m or 10 storeys

c. throughout the entire height of the wall, i.e. both below and above 18m?

No

d. to high-rise residential buildings only?

Yes

e. If no, should the ban apply to high-rise non-residential buildings e.g. offices and other buildings, as well as residential buildings?

No

f. Please provide any further information in relation to your answers above

No these buildings are used in different ways and generally with a lower fire risk

Page 3: Question 3

a. Do you agree that the European classification system should be used?

No

b. If yes, do you consider that Class A2 or better is the correct classification for materials to be used in wall construction?

No

c. If no, what class should be allowed in wall construction and why?

If a ban is introduced then we believe that the BS 476 series of tests should be used as they provide a higher performance than the non-combustible Euroclasses A1 & A2

Page 4: Question 4

a. Do you agree that a ban should cover the entire wall construction?

No

b. If no, what aspects of the wall should it cover?

If a ban is introduced then only for external ventilated rainscreen systems and the outermost layer of cladding only

c. Should a ban also cover window spandrels, balconies, brise soleil and similar building elements?

No

d. Please provide any further information in relation to your answers above

Separate tests/standards may be required for these additional items

Page 5: Question 5

b. If yes, what components should be included on an exemption list and what conditions should be imposed on their use?

Yes there will need to be exceptions but where to draw the line, will it extend to mechanical fixings and windows?

c. If no, what alternative way of achieving the policy aims would you suggest?

BS8414 system test is the most robust way of testing a complete system. We are not aware of any evidence of fires being out of control in systems successfully tested to this standard. Tests on systems can fail and this includes the test commissioned by DCLG on the façade system that had been installed on Grenfell Tower which failed a few minutes in.

Page 6: Question 6

a. the ban should apply to proposed material alterations to existing buildings, including over-cladding?

No

b. the ban should extend to projects that have been notified before the ban takes effect but work has not begun on site?

Yes

c. the ban should not affect projects where building work has already begun on site?

Yes

e. Please provide any further information in relation to your answers above

But then what happens to the designed specification which will require amendment before work commences, and the associated costs involved

Page 7: Question 7

a. Which wall elements are likely to be affected by the proposed change – i.e. where they would pass as part of a cladding system in a BS 8414 test but would not meet the proposed Class A2 or better requirement (e.g. sheathing boards or vapour barriers)?

Ventilated rainscreen systems

b. In England there are suggestions that since the Grenfell Tower fire, a high proportion of relevant building work is already using elements which meet Class A2 or better. What is your experience?

This may also have been the case beforehand but lower Euroclass materials may also be suitable if tested and proven as part of a complete system

c. What is the impact of removing access to the BS 8414 for those buildings affected by the ban test likely to be?

Thicker, heavier insulation required for the same thermal performance. Potential structural issues through additional loads as traditional non-combustible insulation requires effectively twice the thickness for the same thermal performance. Thicker walls could lead to increased costs associated with deeper window reveals and fixing requirements Possibly loss of living space through having to insulate walls internally

d. How much extra cost would typically be involved in meeting the proposed new requirements (for buildings 18m or over) against a building which meets the current requirements? (Please provide any further details)

As a manufacturer we have no way of being able to estimate extra costs

e. Please provide any further comments on the likely impact of this change for construction e.g. supply chains

If combustible products are banned then stone wool becomes the default solution for ventilated rainscreen systems. One supplier dominates the market, this could lead to capacity/supply inbalance and inflated pricing. Other non-combustible insulation manufacturers (glass mineral wool) are currently experiencing capacity issues
With ambitious carbon reduction targets in place for 2050, insulation and fabric energy efficiency play a vital part in combatting climate change. PIR insulation accounts for approximately half of all thermal insulation used in buildings in the UK, in both new build and refurbishment markets. Its relative ‘thin-ness’, compressive strength and resistance to moisture offer advantages and benefits over non-combustible insulation. These

e. Please provide any further comments on the likely impact of this change for construction e.g. supply chains

benefits should not be ignored.

Page 9: Submit your response

You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name	[redacted]
Position (if applicable)	[redacted]
Organisation (if applicable)	[redacted]
Address (including postcode)	[redacted]
Email address	[redacted]
Telephone number	[redacted]
Please state whether you are responding on behalf of yourself or the organisation stated above	[redacted]

Please indicate whether you are applying to this consultation as:

Manufacturer

If you want to receive a receipt of your response, please provide an email address. Email address

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Response 18

Page 1: Question 1

a. Do you agree that combustible materials in cladding systems should be banned?

Yes

b. Should the ban be implemented through changes to the Building Regulations (i.e through legislation rather than the Approved Documents)?

Yes

Page 2: Question 2

a. to buildings 18m or over in height?

Yes

b. If no, to what height, higher or lower, should the ban apply? Explain why

Comments:
External wall construction for existing or new buildings with a storey 18m or more above ground should be comprised of non-combustible materials only. However, insurers would welcome a review of this trigger height to a lower level. The fire growth effects we saw with Grenfell were accelerated by wind movements and the 'open' nature of the building combined with inappropriate paneling. Considering the 'breakout/break in' effects we see in domestic multi storey buildings with fire leaving through windows and re-entering via the apartment or compartment windows above and the increased wind action at higher levels. In Scotland, they are currently reviewing a potential reduction in height for non-combustible materials on the external envelope of high-rise buildings from 18m to 11m.

c. throughout the entire height of the wall, i.e. both below and above 18m?

Yes

d. to high-rise residential buildings only?

No

e. If no, should the ban apply to high-rise non-residential buildings e.g. offices and other buildings, as well as residential buildings?

Yes

f. Please provide any further information in relation to your answers above

A fire on the exterior up to the height of 18m has the potential to affect the floors above, as well as the area outside of the building potentially being affected by falling debris. Ensuring that the lower levels of the building are also built using non-combustible material will reduce the risk of external fires (for example arson to external waste bins could then spread up the external surface of a building).

f. Please provide any further information in relation to your answers above

Although the Independent Review for Building Regulations and Fire Safety looked purely at high-rise residential buildings, we would support the ban of combustible materials on the outside of other buildings at high-risk, including commercial buildings.

Page 3: Question 3

a. Do you agree that the European classification system should be used?

Yes

b. If yes, do you consider that Class A2 or better is the correct classification for materials to be used in wall construction?

Yes

c. If no, what class should be allowed in wall construction and why?

Yes, although the classification should be applied to the individual materials of each component and sub-component of an external wall construction. This should include the individual material of the components / and their sub-components of the built-up system.

Page 4: Question 4

a. Do you agree that a ban should cover the entire wall construction?

Yes

c. Should a ban also cover window spandrels, balconies, brise soleil and similar building elements?

Yes

d. Please provide any further information in relation to your answers above

It is important that fire spread is not promoted through the combustibility of materials throughout the system. If limited combustible materials are encapsulated correctly then technically they are considered non-combustible under the current definition. However, this relies on the correct encapsulation, which may not happen in real world conditions.

Page 5: Question 5

a. Do you agree that a limited number of wall system components should, by exception, be exempted from the proposed ban?

Yes

b. If yes, what components should be included on an exemption list and what conditions should be imposed on their use?

b. If yes, what components should be included on an exemption list and what conditions should be imposed on their use?

Only small combustible fixings which would not cause or promote fire spread.

Page 6: Question 6

a. the ban should apply to proposed material alterations to existing buildings, including over-cladding?

Yes

b. the ban should extend to projects that have been notified before the ban takes effect but work has not begun on site?

Yes

c. the ban should not affect projects where building work has already begun on site?

No

e. Please provide any further information in relation to your answers above

for c - this should be a risk-based approach

Page 7: Question 7

a. Which wall elements are likely to be affected by the proposed change – i.e. where they would pass as part of a cladding system in a BS 8414 test but would not meet the proposed Class A2 or better requirement (e.g. sheathing boards or vapour barriers)?

Insulation, cladding, vapour barriers and membranes, substrates, sheathing, battens, finishes and ACM.

b. In England there are suggestions that since the Grenfell Tower fire, a high proportion of relevant building work is already using elements which meet Class A2 or better. What is your experience?

This is not within the ABI's remit to answer.

c. What is the impact of removing access to the BS 8414 for those buildings affected by the ban test likely to be?

ABI members commissioned the FPA to complete an in-depth study into the current BS 8414 test regime, with the aim to understand whether there are shortcomings with current test methods and assess the benefits of a test specification that requires complete non-combustibility of the major components of cladding systems

The full report 'Cladding Approvals: A review and investigation of potential shortcomings of the BS 8414 standard for the approval of cladding systems such as those commonly used on tall buildings' is available on the ABI website. A pre-requisite of built-up-system testing is that the test specimen truly represents the situation into which the system will be installed, but there may be doubt that this criterion is being met on a number of counts, including:
1. Fuel load;
2. Breaching of the cladding system by un-fire-stopped vents and ducts;
3. Oxygen provision to materials and allowance of 'chimney effects' to manifest;

c. What is the impact of removing access to the BS 8414 for those buildings affected by the ban test likely to be?

4. Performance of cavity barriers; and
5. System detailing differences between certification and in-use applications.

The findings from the FPA research suggest that the BS 8414 test may not give designers, specifiers or insurers confidence that cladding systems tested to it will ensure the level of building fire safety that is currently inferred by its use.

d. How much extra cost would typically be involved in meeting the proposed new requirements (for buildings 18m or over) against a building which meets the current requirements? (Please provide any further details)

This is not within the remit of the ABI to answer. It is important however to recognise that a building insurance policy will not come into play due to inappropriate cladding or combustible material being on a building and therefore any changes will not be funded through insurers. A building insurance policy will only kick in if there has been damage by a named peril.

e. Please provide any further comments on the likely impact of this change for construction e.g. supply chains

The resulting reduction in polymeric type materials, if combustible materials are banned, would lead to a reduction in the harmful substances presented by construction and insulation materials, whether combusted or not, being transported by uncontrolled firefighting water run-off in the event of a fire that could give rise to severe environmental pollution problems.

Page 9: Submit your response

You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name	Laura Hughes
Position (if applicable)	Senior Policy Adviser
Organisation (if applicable)	Association of British Insurers
Address (including postcode)	One America Square, 17 Crosswall, London, EC3N 2LB
Email address	laura.hughes@abi.org.uk
Telephone number	0207 216 7538
Please state whether you are responding on behalf of yourself or the organisation stated above	On behalf of the ABI and it's membership (approximately 90% of the UK Insurance Industry)

Please indicate whether you are applying to this consultation as:

Insurer

If you want to receive a receipt of your response, please provide an email address. Email address

laura.hughes@abi.org.uk

Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

Response 19

Page 1: Question 1

a. Do you agree that combustible materials in cladding systems should be banned?

Yes

b. Should the ban be implemented through changes to the Building Regulations (i.e through legislation rather than the Approved Documents)?

Yes

Page 2: Question 2

a. to buildings 18m or over in height?

Yes

b. If no, to what height, higher or lower, should the ban apply? Explain why

Yes

c. throughout the entire height of the wall, i.e. both below and above 18m?

Yes

d. to high-rise residential buildings only?

No

e. If no, should the ban apply to high-rise non-residential buildings e.g. offices and other buildings, as well as residential buildings?

Yes

f. Please provide any further information in relation to your answers above

Other use classes have different risk criteria which should be taken into consideration when determining what construction materials can be employed. Application of regulations to future change of use may be compromised by inappropriate use of cladding materials.

Page 3: Question 3

a. Do you agree that the European classification system should be used?

Yes

b. If yes, do you consider that Class A2 or better is the correct classification for materials to be used in wall construction?

Yes

Page 4: Question 4

a. Do you agree that a ban should cover the entire wall construction?

Don't know

b. If no, what aspects of the wall should it cover?

The consultation acknowledges that a ban or restriction cannot cover the entire wall construction. All parts of a wall construction must be subject to scrutiny and appropriate testing. Composite components must be subject to test in appropriate circumstances. Tests involving encapsulated materials that may in themselves not satisfy a test of combustibility should be appropriate, relevant and the materials be unambiguously specified and recognisable.

c. Should a ban also cover window spandrels, balconies, brise soleil and similar building elements?

Yes

Page 5: Question 5

a. Do you agree that a limited number of wall system components should, by exception, be exempted from the proposed ban?

Yes

b. If yes, what components should be included on an exemption list and what conditions should be imposed on their use?

Where there is recognised difficulty in providing a component that meets any restrictive requirement, it should be shown by suitable test that the component does not contribute to the spread of fire of compromise the construction in terms of fire safety.

Page 6: Question 6

a. the ban should apply to proposed material alterations to existing buildings, including over-cladding?

Yes

b. the ban should extend to projects that have been notified before the ban takes effect but work has not begun on site?

Yes

c. the ban should not affect projects where building work has already begun on site?

Don't know

e. Please provide any further information in relation to your answers above

Blaenau Gwent are conscious of a risk of 'property blight' where higher standards are imposed for developments approved but not commenced, with a lesser standard for developments under construction or recently completed.

Page 7: Question 7

c. What is the impact of removing access to the BS 8414 for those buildings affected by the ban test likely to be?

Paragraph 4 of this consultation states "The Welsh Ministers stand by the advice issued by the UK Government Expert Panel that wall systems that have met BS8414 can be considered to be safe" it would therefore be considered unreasonable and unethical to change this position without further evidence.

Page 9: Submit your response

You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name	Lynd Healy
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Telephone number	01495 354740
Please state whether you are responding on behalf of yourself or the organisation stated above	On behalf of Blaenau Gwent County Borough Council

Please indicate whether you are applying to this consultation as:

Local Authority

If you want to receive a receipt of your response, please provide an email address. Email address

lynda.healy@blaenau-gwent.gov.uk

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Response 20

Page 1: Question 1

a. Do you agree that combustible materials in cladding systems should be banned?

Yes

b. Should the ban be implemented through changes to the Building Regulations (i.e through legislation rather than the Approved Documents)?

Yes

Page 2: Question 2

a. to buildings 18m or over in height?

No

b. If no, to what height, higher or lower, should the ban apply? Explain why

Comments:
It should apply to all buildings as if you allow it to be applied to buildings less than 18m high it will still be a combustible material and therefore the risk is still prevelant.

c. throughout the entire height of the wall, i.e. both below and above 18m?

Yes

d. to high-rise residential buildings only?

No

e. If no, should the ban apply to high-rise non-residential buildings e.g. offices and other buildings, as well as residential buildings?

Yes

Page 3: Question 3

a. Do you agree that the European classification system should be used?

Yes

b. If yes, do you consider that Class A2 or better is the correct classification for materials to be used in wall construction?

Yes

Page 4: Question 4

a. Do you agree that a ban should cover the entire wall construction?

Yes

c. Should a ban also cover window spandrels, balconies, brise soleil and similar building elements?

Yes

Page 5: Question 5

a. Do you agree that a limited number of wall system components should, by exception, be exempted from the proposed ban?

No

c. If no, what alternative way of achieving the policy aims would you suggest?

It should be made mandatory that safe materials are used in all circumstances.

Page 6: Question 6

a. the ban should apply to proposed material alterations to existing buildings, including over-cladding?

Yes

b. the ban should extend to projects that have been notified before the ban takes effect but work has not begun on site?

Yes

c. the ban should not affect projects where building work has already begun on site?

No

e. Please provide any further information in relation to your answers above

Answer C would depend on how far the works had progressed. Councils should review each case individually.

Page 7: Question 7

a. Which wall elements are likely to be affected by the proposed change – i.e. where they would pass as part of a cladding system in a BS 8414 test but would not meet the proposed Class A2 or better requirement (e.g. sheathing boards or vapour barriers)?

External walls of residential buildings 18m or over

b. In England there are suggestions that since the Grenfell Tower fire, a high proportion of relevant building work is already using elements which meet Class A2 or better. What is your experience?

b. In England there are suggestions that since the Grenfell Tower fire, a high proportion of relevant building work is already using elements which meet Class A2 or better. What is your experience?
Unable to comment - as we are only a consultee on planning matters and not the unitary authority.

c. What is the impact of removing access to the BS 8414 for those buildings affected by the ban test likely to be?
Unable to comment at this stage

d. How much extra cost would typically be involved in meeting the proposed new requirements (for buildings 18m or over) against a building which meets the current requirements? (Please provide any further details)
Unable to comment as we are only a consultee on planning matters and not the unitary authority.

Page 9: Submit your response

You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

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Local Authority

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Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

Response 21

Page 1: Question 1

a. Do you agree that combustible materials in cladding systems should be banned?

Yes

b. Should the ban be implemented through changes to the Building Regulations (i.e through legislation rather than the Approved Documents)?

Yes

c. If no, how else could the ban be achieved?

a. The circumstances surrounding the fire at Grenfell Tower has indicated that stronger measures are required, underpinned by legislation. The Building Regulations and complementary guidance has been subject to different interpretations by persons with an obligation to comply with those regulations.

b. It will be of central importance that reforming legislation is drafted with sufficient clarity to prevent the legislation being subject to varying interpretations as occurs in the case of the current Building Regulations and associated guidance.

c. Whilst, legislation is the appropriate vehicle for a ban on combustible materials in cladding systems, there will be complementary actions needed by industry and government, as set out in the Hackitt review.

Page 2: Question 2

a. to buildings 18m or over in height?

No

b. If no, to what height, higher or lower, should the ban apply? Explain why

No
Comments:
The setting of a threshold at 18 metres will result in the continuation of the current practice of positioning the occupied floor at just under 18m, with the objective of avoiding the regulations and thereby saving expenditure on the enhanced fire safety measures which are applicable in the area above 18m. Moreover, for reasons mentioned below, there is no compelling reason why the banning of combustible materials in cladding systems should not extend to premises below 18m, as those combustible materials present a safety threat of rapid external fire spread in premises which fall below 18m, too. b. The height of 18 m was historically fixed on as appropriate because it dovetailed with the deployment of certain fire-fighting equipment. Such equipment is no longer in use, and the setting of the threshold of the height of premises at 18m has thereby lost its historical rationale. As abovementioned, the use of combustible materials in cladding systems present a safety threat of rapid external fire spread in premises of any height; and consideration should be given to banning them, irrespective of the height of a building.

c. throughout the entire height of the wall, i.e. both below and above 18m?

Yes

d. to high-rise residential buildings only?

No

e. If no, should the ban apply to high-rise non-residential buildings e.g. offices and other buildings, as well as residential buildings?

Yes

f. Please provide any further information in relation to your answers above

No. Regardless of the matters of buildings' height and types of occupancy, the risk of external fire spread from combustible materials in external cladding would make it preferable to extend the ban to building occupancies, additional to residential use, Hospitals, Care homes, Education establishments.

e. Yes. It is acknowledged that the lack of sleeping in certain premises such as those put to office use will make the persons occupying them less vulnerable than in premises used for residential purposes. However, there will still be a residual risk of rapid external fire spread which could compromise their escape to a place of safety in a margin of safety.

If a ban on the use of combustible materials in cladding systems in all occupancies is not to be introduced. A ban on such materials in cladding systems should as a minimum extend to premises where vulnerable people stay and sleep, such as Hospitals and Care Homes is recommended.

Page 3: Question 3

a. Do you agree that the European classification system should be used?

No

c. If no, what class should be allowed in wall construction and why?

c. SWFRS support the recommendation by NFCC to this issue; NFCC are of the opinion that A2 should be further refined than the current AD-B expectation of A2-s3, d2 or better. This classification allows for high smoke production and flaming droplets and we recommend that these aspects should be further controlled. We recommend consideration is given to restricting to A2-s1, d0. (where; s1 structural element may emit a very limited amount of combustion gases and d0 burning droplets or particles must not be emitted from the structural element emphasis added)

Page 4: Question 4

a. Do you agree that a ban should cover the entire wall construction?

Yes

c. Should a ban also cover window spandrels, balconies, brise soleil and similar building elements?

Yes

d. Please provide any further information in relation to your answers above

As combustible materials in relation to some components of the external wall/façade and attachments to the said external wall have the potential for rapid vertical fire spread, the ban should extend to the use of

d. Please provide any further information in relation to your answers above

combustible materials in relation to items like balconies, and window spandrels. Other relevant matters relating to the external wall/façade and attachments to its external face, and which require control, include the following, cited by the NFCC:-

• items such as ‘green wall’ or ‘living wall’ components have which have contributed to rapid fire spread; and
• Extensive use of solar panels attached to the outside of a building, some of which extend to the full height of a tall residential tower.

Page 5: Question 5

a. Do you agree that a limited number of wall system components should, by exception, be exempted from the proposed ban?

Yes

b. If yes, what components should be included on an exemption list and what conditions should be imposed on their use?

Fixings, membranes (as long as it can be demonstrated that these will not contribute to fire spread).

c. If no, what alternative way of achieving the policy aims would you suggest?

Legislation will be the central way of achieving the policy aims. This would be pivotal in addressing what Dame Judith Hackitt referred to as a “broken system”. It would be complemented with the recommended efforts of government and industry identified in her report, and this would need to continue to be emphasised.

As shown by historical changes in behaviour connected with public safety brought about by legislation, such as the Health and Safety at Work Act 1974, legislation would be the main impetus of changing behaviour about safety in relation to the fabric of buildings as regards fire spread.

Page 6: Question 6

a. the ban should apply to proposed material alterations to existing buildings, including over-cladding?

Yes

b. the ban should extend to projects that have been notified before the ban takes effect but work has not begun on site?

Yes

c. the ban should not affect projects where building work has already begun on site?

No

e. Please provide any further information in relation to your answers above

e. Please provide any further information in relation to your answers above

Yes, there will however, remain a range of buildings which will contain external cladding with combustible materials, which will be unaffected because they are not subject to material alterations. While the immediate focus of proposed legislative reform is the Building Regulations, the reforming of the Building Regulations should be complemented by the scrutiny of the Regulatory Reform (Fire Safety) Order 2005. The Order has never been materially revised since its inception and there exist a number of areas where changes could complement the proposed amendments to the Building Regulations.

For example there is no explicit inclusion in The Order of the front doors to flats which, as fire doors, form part of the protected route which provides the vital means of escape in the event of fire. It is suggested that The Order should be revised to deem as part of the common areas the front doors of private accommodation which protect the means of escape from fire and the products of combustion; and responsible persons' responsibilities should be expressly extended to the maintenance of such fire rated doors.

The fabric of a building should explicitly be included in the scope of The Order. In consequence, the Fire Risk Assessment for premises will need to include the risks to relevant persons from matters pertaining to the fabric, such as cladding containing combustible materials; and after identifying such risks take remedial measures to combat the risks.

Fire Risk Assessors are not required to have any qualifications. This makes it possible for anyone purporting to be a fire risk assessor to offer commercial services in this field. It is suggested that persons carrying out fire risk assessments for commercial gain, should be required to be accredited by a professional body such as the Institute of Fire Engineers.

Such measures would appreciably improve safety, particularly for persons residing in buildings where material alterations are not carried out, and who therefore, will not benefit from the proposed changes to the Building Regulations.

c. No all projects should be considered

Page 7: Question 7

a. Which wall elements are likely to be affected by the proposed change – i.e. where they would pass as part of a cladding system in a BS 8414 test but would not meet the proposed Class A2 or better requirement (e.g. sheathing boards or vapour barriers)?

SWFRS is unable to answer all the elements of this question and will leave 7 d, e, to those with more information than ourselves to pass comments.

a. SWFRS considers that the ban should extend to the use of combustible material used in wall systems however placing cognisance on new and innovative design that have passed a full system test and not necessary individual elements.

b. In England there are suggestions that since the Grenfell Tower fire, a high proportion of relevant building work is already using elements which meet Class A2 or better. What is your experience?

SWFRS has no direct experience of this.

c. What is the impact of removing access to the BS 8414 for those buildings affected by the ban test likely to be?

SWFRS considers the even when wall systems constructed using class A1 or A2 products, the wall system should still be subjected to full system fire testing using the appropriate test, and inspected on site to ensure

c. What is the impact of removing access to the BS 8414 for those buildings affected by the ban test likely to be?
correct installation.

Page 9: Submit your response

You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

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Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

Response 22

Page 1: Question 1

a. Do you agree that combustible materials in cladding systems should be banned?

Yes

b. Should the ban be implemented through changes to the Building Regulations (i.e through legislation rather than the Approved Documents)?

Yes

c. If no, how else could the ban be achieved?

N/A

Page 2: Question 2

a. to buildings 18m or over in height?

Yes

b. If no, to what height, higher or lower, should the ban apply? Explain why

No

c. throughout the entire height of the wall, i.e. both below and above 18m?

Yes

d. to high-rise residential buildings only?

No

e. If no, should the ban apply to high-rise non-residential buildings e.g. offices and other buildings, as well as residential buildings?

No

f. Please provide any further information in relation to your answers above

Part c should be extended to areas where people live and/or sleep either as originally built or by material change of use.
Construction of commercial buildings in part d should be subject to due diligence in their design to include fire risk assessment and approved installers. A blanket ban should not be necessary.

Page 3: Question 3

a. Do you agree that the European classification system should be used?

Don't know

b. If yes, do you consider that Class A2 or better is the correct classification for materials to be used in wall construction?

No

c. If no, what class should be allowed in wall construction and why?

Whilst class A2 may be appropriate for many building materials, it is impractical and impossible to be included for all. Many common materials involved in fenestration should be excluded as many cannot practically meet Class A2.

Page 4: Question 4

a. Do you agree that a ban should cover the entire wall construction?

No

b. If no, what aspects of the wall should it cover?

There are materials within the wall construction which cannot practically achieve an A1 or A2 rating of combustibility. We suggest listing materials which can be included in wall constructions, rather than those that cannot be used.

c. Should a ban also cover window spandrels, balconies, brise soleil and similar building elements?

No

d. Please provide any further information in relation to your answers above

There are materials within the wall construction which cannot practically achieve an A1 or A2 rating of combustibility. We suggest listing materials which can be included in wall constructions, rather than those that cannot be used.

Page 5: Question 5

a. Do you agree that a limited number of wall system components should, by exception, be exempted from the proposed ban?

Yes

b. If yes, what components should be included on an exemption list and what conditions should be imposed on their use?

Fenestration materials such as framing components, IGU and glazing seals. Laminated glass. These are items which are an integral part of wall constructions and yet cannot be classed as non-combustible.

c. If no, what alternative way of achieving the policy aims would you suggest?

Yes – the simplest approach would be to list the items which are included in the ban, as opposed to those which are to be exempt. It is likely that a material might be missed when compiling a list of exceptions. This may have a massive effect on construction if that particular material can no longer be used.

Page 6: Question 6

a. the ban should apply to proposed material alterations to existing buildings, including over-cladding?

Yes

b. the ban should extend to projects that have been notified before the ban takes effect but work has not begun on site?

No

c. the ban should not affect projects where building work has already begun on site?

No

e. Please provide any further information in relation to your answers above

Answers of 'no' to questions c and d are subject to consultation with the insurance sector as to the potential legal and financial implications of changing specifications at these stages of the building process.

Page 7: Question 7

a. Which wall elements are likely to be affected by the proposed change – i.e. where they would pass as part of a cladding system in a BS 8414 test but would not meet the proposed Class A2 or better requirement (e.g. sheathing boards or vapour barriers)?

Don't know

b. In England there are suggestions that since the Grenfell Tower fire, a high proportion of relevant building work is already using elements which meet Class A2 or better. What is your experience?

Don't know

c. What is the impact of removing access to the BS 8414 for those buildings affected by the ban test likely to be?

Systems which would pass a BS8414 test but contain materials not capable of achieving a reaction to fire Class A1 or A2 will no longer comply. This is likely to result in a requirement for improved insulation in areas other than the façade, leading to a potential for reduced floor space. In addition, it may result in an inability in fulfilling the original functionality of the building design specification.

d. How much extra cost would typically be involved in meeting the proposed new requirements (for buildings 18m or over) against a building which meets the current requirements? (Please provide any further details)

d. How much extra cost would typically be involved in meeting the proposed new requirements (for buildings 18m or over) against a building which meets the current requirements? (Please provide any further details)
Don't know

e. Please provide any further comments on the likely impact of this change for construction e.g. supply chains
N/A

Page 9: Submit your response

You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

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Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

Response 23

Page 1: Question 1

a. Do you agree that combustible materials in cladding systems should be banned?

No

b. Should the ban be implemented through changes to the Building Regulations (i.e through legislation rather than the Approved Documents)?

No

c. If no, how else could the ban be achieved?

If a ban of some kind is introduced, then changes should come through Approved Document B to allow flexibility and to avoid stifling innovation.

Page 2: Question 2

a. to buildings 18m or over in height?

No

b. If no, to what height, higher or lower, should the ban apply? Explain why

No
Comments:
In case a ban would come into force we would prefer a threshold by storey rather than a fixed height of 18m. For example buildings which are 10 storeys or higher.

c. throughout the entire height of the wall, i.e. both below and above 18m?

No

d. to high-rise residential buildings only?

No

e. If no, should the ban apply to high-rise non-residential buildings e.g. offices and other buildings, as well as residential buildings?

No

Page 3: Question 3

a. Do you agree that the European classification system should be used?

No

b. If yes, do you consider that Class A2 or better is the correct classification for materials to be used in wall construction?

No

c. If no, what class should be allowed in wall construction and why?

We advocate on tests of the whole system and not only single components.
BS 8414 is an example of a worldwide renowned test which takes into account all the components which make up the cladding including the cavity in a ventilated façade.

Page 4: Question 4

a. Do you agree that a ban should cover the entire wall construction?

No

b. If no, what aspects of the wall should it cover?

We believe that the outer cladding panel in rainscreen applications should be covered.
Grenfell has clearly indicated that the ACM was the most significant contributor to fire spread.
In general we think it will be very difficult to draw a line and by whom and how will this be enforced.

c. Should a ban also cover window spandrels, balconies, brise soleil and similar building elements?

No

d. Please provide any further information in relation to your answers above

Since these components are not suitable for testing to BS 8414 a performance test to ensure their fitness for purpose may need to be devised.

Page 5: Question 5

a. Do you agree that a limited number of wall system components should, by exception, be exempted from the proposed ban?

No

c. If no, what alternative way of achieving the policy aims would you suggest?

Should a ban be introduced, which we do not support, then it should be restricted to outer cladding panels in rainscreen applications only.
Since the Grenfell tragedy, we have not come across any evidence of fires that have progressed out of control in buildings with systems that would comply with BS 8414. The testing of complete systems to BS 8414 is the most robust way to regulate the performance regardless of whether components are combustible or non-combustible. We already know from the Government's own BS 8414 tests that systems can fail, and in the case of the façade system used on Grenfell Tower, this failed very early on, in fact within only a few minutes.

Page 6: Question 6

a. the ban should apply to proposed material alterations to existing buildings, including over-cladding?

No

b. the ban should extend to projects that have been notified before the ban takes effect but work has not begun on site?

No

c. the ban should not affect projects where building work has already begun on site?

Yes

e. Please provide any further information in relation to your answers above

It is already evident that many buildings currently do not comply with regulations and that inspection and compliance issues are not dealt with consistently, if at all. The real emphasis needs to focus on how regulations can be enforced and penalties applied where there is evidence of non-compliance.

Page 7: Question 7

a. Which wall elements are likely to be affected by the proposed change – i.e. where they would pass as part of a cladding system in a BS 8414 test but would not meet the proposed Class A2 or better requirement (e.g. sheathing boards or vapour barriers)?

It is highly likely that all elements could be affected but it would depend on the system build-up and whether any exemptions have been put in place. Without carrying out whole-system testing to BS 8414 there will be no way of knowing whether a system is compliant. It may well be that by using products which have been individually declared as safe to use, a situation could arise whereby you end up with some systems comprising entirely of combustible products (with the exception of fittings etc.) which can pass the BS 8414 test whilst other systems that comprise non-combustible or limited combustibility insulation and cladding panels could fail the same test. This has the potential to have the opposite effect of the proposed ban and lead to less compliant buildings and more confusion.

b. In England there are suggestions that since the Grenfell Tower fire, a high proportion of relevant building work is already using elements which meet Class A2 or better. What is your experience?

There has been a noticeable shift to non or limited combustibility materials since the Grenfell tragedy. However, such a move, without rigorous testing to BS 8414, will not necessarily make buildings safer. As stated earlier there is a need for whole-system testing regardless of whether the components are deemed combustible or non-combustible.
It should also be considered that if a ban is introduced this could have the effect that some of the buildings identified under the Building Safety Program will become non-compliant even after

e. Please provide any further comments on the likely impact of this change for construction e.g. supply chains

A ban on combustible materials will inevitably lead to supply chain constraints in the insulation market. Already there is evidence of supply issues in the non-combustible sector and significant price rises in light of this. The UK has essentially one main supplier of non-combustible insulation which also raises concerns. If shortages do start to appear, then there will inevitably be a slow-down in construction output which will have the knock-on effect of failing to meet the Government's already ambitious targets for carbon reduction.
The PIR insulation industry has been in existence for 40 years and accounts for around 40% of all thermal

e. Please provide any further comments on the likely impact of this change for construction e.g. supply chains

insulation sold into the UK market with an estimated turnover of around £400m per annum and employing around 3500 people. Insulation is one of the most important tools in helping to combat climate change and PIR insulation, which can used in a wide variety of applications (including walls, roofs and floors), meets the required U-values for new buildings as well as when retrofitting existing buildings.
Besides its high thermal performance, it has a high weight to strength ratio and has good water resistance properties. Other performance characteristics of non-combustible insulation need to be taken into account alongside the crucial fire performance characteristics and not viewed in isolation.

Page 9: Submit your response

You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

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Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

Response 24

Page 1: Question 1

a. Do you agree that combustible materials in cladding systems should be banned?

Yes

b. Should the ban be implemented through changes to the Building Regulations (i.e through legislation rather than the Approved Documents)?

Yes

c. If no, how else could the ban be achieved?

N/A

Page 2: Question 2

a. to buildings 18m or over in height?

Yes

b. If no, to what height, higher or lower, should the ban apply? Explain why

No
Comments:
We agree that the ban should apply to all buildings, both residential and non-residential, over 18m in height where multiple escape routes are in place. In addition, the ban should apply to all other buildings, both residential and non-residential, over 12m in height where single escape routes are in place. Further, the ban should apply to all high-risk buildings such as hospitals, care homes, schools, hotels, and entertainment venues, regardless of height.

c. throughout the entire height of the wall, i.e. both below and above 18m?

Yes

d. to high-rise residential buildings only?

No

e. If no, should the ban apply to high-rise non-residential buildings e.g. offices and other buildings, as well as residential buildings?

Yes

f. Please provide any further information in relation to your answers above

f. Please provide any further information in relation to your answers above

A ban which incorporates all of the building types highlighted above is essential for multiple reasons, including:
• Occupants of all high-rise and high-risk buildings should enjoy no lesser standard of safety than those in residential buildings.
• There is a significant trend towards multi-purpose buildings as well as the conversion of office buildings to residential buildings around the UK. It is imperative that our buildings are future-proofed to allow for changing use over their lifetimes in a manner that ensures continued public safety.
• A multi-tier system introduces significant complexity which goes against the need for clear and straightforward public safety requirements.

In addition to the above comments, we have submitted a separate, supplementary information paper. This paper includes detailed technical comments addressing the specific vulnerability of high-rise and high-risk buildings, the use of existing large-scale fire tests and the proposed definition of non-combustible materials.

Page 3: Question 3

a. Do you agree that the European classification system should be used?

Yes

b. If yes, do you consider that Class A2 or better is the correct classification for materials to be used in wall construction?

Yes

c. If no, what class should be allowed in wall construction and why?

N/A

Page 4: Question 4

a. Do you agree that a ban should cover the entire wall construction?

Yes

b. If no, what aspects of the wall should it cover?

N/A

c. Should a ban also cover window spandrels, balconies, brise soleil and similar building elements?

Yes

d. Please provide any further information in relation to your answers above

We believe a ban should also cover window spandrels, balconies, brise soleil and similar building elements. The importance of this was highlighted most recently by a fire which spread to four balconies at a block of flats in West Hampstead.

However, as per our response to Question 5, we consider that specific, non-substantive components with minimal ‘fuel source potential’ could be exempted.

Page 5: Question 5

a. Do you agree that a limited number of wall system components should, by exception, be exempted from the proposed ban?

Yes

b. If yes, what components should be included on an exemption list and what conditions should be imposed on their use?

Exemptions should be limited to non-substantive components with minimal ‘fuel source potential’.

We suggest that exempted components be included on an exemption list which clearly and unambiguously defines:
• the description of the exempted component and its specific, allowed purpose;
• its composition and fire performance (Euroclass, calorific content, etc);
• any limiting dimensions;
• the required certification of the exempted component;
• the quantity of exempted component that may be used;
• the allowed location of the exempted component and/or any prohibited locations; and
• any restrictions on how the exempted component may be used in combination with other materials, notably other exempted components.

Components which should be reviewed under such a framework would include internal wallpaper and paint, window frames, gaskets and seals, vapour membranes, surface finishes and laminated glass.

c. If no, what alternative way of achieving the policy aims would you suggest?

N/A

Page 6: Question 6

a. the ban should apply to proposed material alterations to existing buildings, including over-cladding?

Yes

b. the ban should extend to projects that have been notified before the ban takes effect but work has not begun on site?

Yes

c. the ban should not affect projects where building work has already begun on site?

No

e. Please provide any further information in relation to your answers above

N/A

Page 7: Question 7

a. Which wall elements are likely to be affected by the proposed change – i.e. where they would pass as part of a cladding system in a BS 8414 test but would not meet the proposed Class A2 or better requirement (e.g. sheathing boards or vapour barriers)?

The primary elements affected would be combustible cladding and insulation materials, for which non-combustible alternatives are readily available.

We propose that non-substantive components with minimal 'fuel source potential' such as vapour barriers should be exempted from the proposed change.

b. In England there are suggestions that since the Grenfell Tower fire, a high proportion of relevant building work is already using elements which meet Class A2 or better. What is your experience?

No precise market data is available, but our own analysis suggests that prior to the Grenfell fire, 80-90% of projects involving a cladding system (either new build or retrofit) involved systems using combustible insulation.

Since the Grenfell fire, a significant shift has taken place such that approximately 20% of high-rise projects involving a cladding system (either new build or retrofit) are now using non-combustible insulation.

c. What is the impact of removing access to the BS 8414 for those buildings affected by the ban test likely to be?

Non-combustible (Euroclass A-rated) solutions are readily available on the market, as is reflected in the market already switching to these solutions post-Grenfell.

d. How much extra cost would typically be involved in meeting the proposed new requirements (for buildings 18m or over) against a building which meets the current requirements? (Please provide any further details)

In a direct comparison of material costs, the cost of non-combustible insulation over combustible insulation may add an additional 0.1% to the overall project costs, which include other materials, plant such as scaffolding and labour. We have commissioned an external review to provide a more detailed breakdown of costs and would be pleased to make this available to the Welsh Government when complete.
In addition, durable non-combustible insulation materials such as mineral wool are more straightforward to install properly, which may deliver higher in-use energy savings than less effectively installed and less durable materials.

e. Please provide any further comments on the likely impact of this change for construction e.g. supply chains

Many countries such as France and Germany already ban or restrict combustible materials for high-rise buildings. In our experience, supply chains, product innovations, and other elements of the construction value chain naturally adapt to the legal and regulatory requirements in any given market.

Page 8: Question 8

We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

We fully support a ban on the use of combustible materials in the external walls of high-rise residential buildings, and believe this should extend to all high-rise and high-risk buildings, such as hospitals and care homes, schools, hotels and sports arenas, where there may be challenges in exiting the premises regardless of their height.
• These high-rise and high-risk buildings should be clad and insulated with Euroclass certified A1 and A2

We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

materials only.
• To support this, we should adopt a simple binary system with building materials classified as either non-combustible (Euroclasses A1 and A2) or combustible (Euroclasses B-F).
• Alongside addressing issues of combustibility, regulations should take account of the creation of toxic smoke during fires. Materials testing and classification should be introduced for toxicity, with stringent limits set on their usage which take account of the fatal dangers of toxic smoke in a fire.

A ban of the scope outlined above is required to protect public safety as the currently allowed alternative route to demonstrating compliance using large-scale testing in accordance with BS 8414 is critically flawed.

Evidence presented to the BSI by several parties including ROCKWOOL and the ABI identifies these flaws (please see attached supplementary paper).

These concerns are further supported by various expert reports stemming from the Grenfell Inquiry. For example, Professor José L. Torero states:
• “Tests such as BS 8414 provide a single scenario deemed consistent with an external fire, a very limited number of measurements and a very simple failure criterion. The combination of these three characteristics does not provide a sufficiently comprehensive assessment of performance.”

Page 9: Submit your response

You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name	Nicholas Ralph
Position (if applicable)	Public Affairs Manager
Organisation (if applicable)	ROCKWOOL Ltd
Address (including postcode)	ROCKWOOL Ltd, Wern Tarw Road, Rhiwceiliog Pencoed, Bridgend, CF35 6NY
Email address	nick.ralph@rockwool.com
Telephone number	07970 142896
Please state whether you are responding on behalf of yourself or the organisation stated above	On behalf of ROCKWOOL Ltd

Please indicate whether you are applying to this consultation as:

Manufacturer

If you want to receive a receipt of your response, please provide an email address. Email address

nick.ralph@rockwool.com

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Response 25

Page 1: Question 1

a. Do you agree that combustible materials in cladding systems should be banned?
Yes

b. Should the ban be implemented through changes to the Building Regulations (i.e through legislation rather than the Approved Documents)?
Yes

Page 2: Question 2

a. to buildings 18m or over in height?
Yes

c. throughout the entire height of the wall, i.e. both below and above 18m?
Yes

d. to high-rise residential buildings only?
No

e. If no, should the ban apply to high-rise non-residential buildings e.g. offices and other buildings, as well as residential buildings?
Yes

Page 3: Question 3

a. Do you agree that the European classification system should be used?
Yes

b. If yes, do you consider that Class A2 or better is the correct classification for materials to be used in wall construction?
Yes

Page 4: Question 4

a. Do you agree that a ban should cover the entire wall construction?
Yes

c. Should a ban also cover window spandrels, balconies, brise soleil and similar building elements?

Don't know

Page 5: Question 5

a. Do you agree that a limited number of wall system components should, by exception, be exempted from the proposed ban?

No

c. If no, what alternative way of achieving the policy aims would you suggest?

Unsure.

Page 6: Question 6

a. the ban should apply to proposed material alterations to existing buildings, including over-cladding?

Yes

b. the ban should extend to projects that have been notified before the ban takes effect but work has not begun on site?

Yes

c. the ban should not affect projects where building work has already begun on site?

No

Page 7: Question 7

a. Which wall elements are likely to be affected by the proposed change – i.e. where they would pass as part of a cladding system in a BS 8414 test but would not meet the proposed Class A2 or better requirement (e.g. sheathing boards or vapour barriers)?

Unsure.

b. In England there are suggestions that since the Grenfell Tower fire, a high proportion of relevant building work is already using elements which meet Class A2 or better. What is your experience?

Do not have any relevant experience.

c. What is the impact of removing access to the BS 8414 for those buildings affected by the ban test likely to be?

Don't know.

d. How much extra cost would typically be involved in meeting the proposed new requirements (for buildings 18m or over) against a building which meets the current requirements? (Please provide any further details)

d. How much extra cost would typically be involved in meeting the proposed new requirements (for buildings 18m or over) against a building which meets the current requirements? (Please provide any further details)
Don't know.

Page 9: Submit your response

You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.	
Name	[redacted]
Position (if applicable)	[redacted]
Organisation (if applicable)	[redacted]
Address (including postcode)	[redacted]
Email address	[redacted]
Telephone number	[redacted]
Please state whether you are responding on behalf of yourself or the organisation stated above	[redacted]

Please indicate whether you are applying to this consultation as:
Local Authority

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Keep my response anonymous

Response 26

Page 1: Question 1

a. Do you agree that combustible materials in cladding systems should be banned?

Yes

b. Should the ban be implemented through changes to the Building Regulations (i.e through legislation rather than the Approved Documents)?

Yes

Page 2: Question 2

a. to buildings 18m or over in height?

Yes

b. If no, to what height, higher or lower, should the ban apply? Explain why

Yes
Comments:
There is an agreement that it should apply to buildings below 18 metres, subject to what there us is .....residential. hotels student accommodation etc

c. throughout the entire height of the wall, i.e. both below and above 18m?

Yes

d. to high-rise residential buildings only?

No

e. If no, should the ban apply to high-rise non-residential buildings e.g. offices and other buildings, as well as residential buildings?

Yes

f. Please provide any further information in relation to your answers above

The products used will need to be A1 /A2 rated, and tested accordingly.

Page 3: Question 3

a. Do you agree that the European classification system should be used?

Yes

b. If yes, do you consider that Class A2 or better is the correct classification for materials to be used in wall construction?

Yes

Page 4: Question 4

a. Do you agree that a ban should cover the entire wall construction?

Yes

c. Should a ban also cover window spandrels, balconies, brise soleil and similar building elements?

Yes

d. Please provide any further information in relation to your answers above

The products used will need to be A1 /A2 rated, and tested accordingly.

Page 5: Question 5

a. Do you agree that a limited number of wall system components should, by exception, be exempted from the proposed ban?

Yes

b. If yes, what components should be included on an exemption list and what conditions should be imposed on their use?

Non combustible components would suffice

Page 6: Question 6

a. the ban should apply to proposed material alterations to existing buildings, including over-cladding?

Yes

b. the ban should extend to projects that have been notified before the ban takes effect but work has not begun on site?

Yes

c. the ban should not affect projects where building work has already begun on site?

No

e. Please provide any further information in relation to your answers above

The products used will need to be A1 /A2 rated, and tested accordingly.

Page 7: Question 7

a. Which wall elements are likely to be affected by the proposed change – i.e. where they would pass as part of a cladding system in a BS 8414 test but would not meet the proposed Class A2 or better requirement (e.g. sheathing boards or vapour barriers)?

Combustible materials will be effected...timber/paints/membranes/plastics etc

b. In England there are suggestions that since the Grenfell Tower fire, a high proportion of relevant building work is already using elements which meet Class A2 or better. What is your experience?

Some are some aren't as there are limited controls in place to check what is being installed, cost is a driver in some circumstances. Who ensures the building complies with legislation ?

c. What is the impact of removing access to the BS 8414 for those buildings affected by the ban test likely to be?

Depends what has been installed, but there will be costs and liability issues

d. How much extra cost would typically be involved in meeting the proposed new requirements (for buildings 18m or over) against a building which meets the current requirements? (Please provide any further details)

More expensive say £10.00/m2..as a guide.

e. Please provide any further comments on the likely impact of this change for construction e.g. supply chains

Additional products awareness and understanding of the issues will be required and the likelihood being costs will increase across the board. Inferior products will not be suitable. Comply or die !!

Page 8: Question 8

We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Government/Building control who signs off buildings .....why is it OK to put combustible materials onto our buildings

Page 9: Submit your response

You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name [redacted]

Position (if applicable) [redacted]

Organisation (if applicable) [redacted]

Address (including postcode) [redacted]

Email address [redacted]

You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Telephone number	[redacted]
Please state whether you are responding on behalf of yourself or the organisation stated above	[redacted]

Please indicate whether you are applying to this consultation as:

Manufacturer

If you want to receive a receipt of your response, please provide an email address. Email address

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Keep my response anonymous

Response 27

Page 1: Question 1

a. Do you agree that combustible materials in cladding systems should be banned?

Yes

b. Should the ban be implemented through changes to the Building Regulations (i.e through legislation rather than the Approved Documents)?

Yes

c. If no, how else could the ban be achieved?

-

Page 2: Question 2

a. to buildings 18m or over in height?

No

b. If no, to what height, higher or lower, should the ban apply? Explain why

-
Comments:
Should be banned form all buildings

c. throughout the entire height of the wall, i.e. both below and above 18m?

Yes

d. to high-rise residential buildings only?

No

e. If no, should the ban apply to high-rise non-residential buildings e.g. offices and other buildings, as well as residential buildings?

Yes

f. Please provide any further information in relation to your answers above

Should be banned from all buildings

Page 3: Question 3

a. Do you agree that the European classification system should be used?

Don’t know

b. If yes, do you consider that Class A2 or better is the correct classification for materials to be used in wall construction?

Yes

c. If no, what class should be allowed in wall construction and why?

-

Page 4: Question 4

a. Do you agree that a ban should cover the entire wall construction?

Yes

b. If no, what aspects of the wall should it cover?

-

c. Should a ban also cover window spandrels, balconies, brise soleil and similar building elements?

Yes

d. Please provide any further information in relation to your answers above

And all internal cladding and insulation between flats.

Page 5: Question 5

a. Do you agree that a limited number of wall system components should, by exception, be exempted from the proposed ban?

Don’t know

b. If yes, what components should be included on an exemption list and what conditions should be imposed on their use?

-

c. If no, what alternative way of achieving the policy aims would you suggest?

There should be more thorough checking of buildings by Building Control Firms.

Page 6: Question 6

a. the ban should apply to proposed material alterations to existing buildings, including over-cladding?

Yes

b. the ban should extend to projects that have been notified before the ban takes effect but work has not begun on site?

Yes

c. the ban should not affect projects where building work has already begun on site?

Yes

e. Please provide any further information in relation to your answers above

All buildings, where such materials are used.

Page 7: Question 7

a. Which wall elements are likely to be affected by the proposed change – i.e. where they would pass as part of a cladding system in a BS 8414 test but would not meet the proposed Class A2 or better requirement (e.g. sheathing boards or vapour barriers)?

Internal cladding as well, including insulation used to maintain compartmentalisation between flats and communal areas

b. In England there are suggestions that since the Grenfell Tower fire, a high proportion of relevant building work is already using elements which meet Class A2 or better. What is your experience?

My experience is only of older buildings 10 -15 years old.Incorrect and cheaper internal cladding used. Not properly sealed and not covering all areas of a building it should.

c. What is the impact of removing access to the BS 8414 for those buildings affected by the ban test likely to be?

A lot of disruption and expensive works.
Could also increase costs of buildings.

d. How much extra cost would typically be involved in meeting the proposed new requirements (for buildings 18m or over) against a building which meets the current requirements? (Please provide any further details)

A lot

e. Please provide any further comments on the likely impact of this change for construction e.g. supply chains

e. Please provide any further comments on the likely impact of this change for construction e.g. supply chains

I re-iterate what I wrote previously. My experience is that Building Control firms are not doing sufficient checking to ensure that buildings have been built with the products stated in the plans and that buildings meet the required safety standards.
Should revert to only using Council building control departments - no personal benefits to skimping the work.
Increased costs to buildings and properties purchased.

Page 8: Question 8

We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

This questionnaire only covers external cladding, but there are similar issues with internal insulation and the compartmentalisation between flats. My experience is that the wrong and cheaper insulation has been used and not properly sealed or used in all areas of a building. Total lack of Building Control.

Page 9: Submit your response

You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name	LYNDA JAMES
Position (if applicable)	Owner of several flats in high rise buildings
Organisation (if applicable)	none
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Telephone number	07789816374
Please state whether you are responding on behalf of yourself or the organisation stated above	Myself

Please indicate whether you are applying to this consultation as:

Property Manager / Housing Association / Landlord

If you want to receive a receipt of your response, please provide an email address. Email address

lynda.james01@btinternet.com

Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

Response 28

Page 1: Question 1

a. Do you agree that combustible materials in cladding systems should be banned?

Yes

b. Should the ban be implemented through changes to the Building Regulations (i.e through legislation rather than the Approved Documents)?

Yes

c. If no, how else could the ban be achieved?

-

Page 2: Question 2

a. to buildings 18m or over in height?

Yes

b. If no, to what height, higher or lower, should the ban apply? Explain why

Comments:

c. throughout the entire height of the wall, i.e. both below and above 18m?

Yes

d. to high-rise residential buildings only?

No

e. If no, should the ban apply to high-rise non-residential buildings e.g. offices and other buildings, as well as residential buildings?

Yes

f. Please provide any further information in relation to your answers above

I feel that that although there is less risk to non residential buildings ie no sleeping accommodation, there is still a significant risk occupants being trapped through smoke entering stairways from combustible materials attached to the building through bad workmanship etc

Page 3: Question 3

a. Do you agree that the European classification system should be used?

Yes

b. If yes, do you consider that Class A2 or better is the correct classification for materials to be used in wall construction?

Yes

c. If no, what class should be allowed in wall construction and why?

-

Page 4: Question 4

a. Do you agree that a ban should cover the entire wall construction?

Yes

b. If no, what aspects of the wall should it cover?

Where the risk of external fire spread caused by the use of combustible materials would be so minimal that it would be disproportionate to ban their use.

c. Should a ban also cover window spandrels, balconies, brise soleil and similar building elements?

Yes

d. Please provide any further information in relation to your answers above

Non combustible materials should be used on balconies on high rise buildings limiting the possibility of collapse

Page 5: Question 5

a. Do you agree that a limited number of wall system components should, by exception, be exempted from the proposed ban?

Don’t know

b. If yes, what components should be included on an exemption list and what conditions should be imposed on their use?

-

c. If no, what alternative way of achieving the policy aims would you suggest?

c. If no, what alternative way of achieving the policy aims would you suggest?
-

Page 6: Question 6

a. the ban should apply to proposed material alterations to existing buildings, including over-cladding?
Yes

b. the ban should extend to projects that have been notified before the ban takes effect but work has not begun on site?
Yes

c. the ban should not affect projects where building work has already begun on site?
Yes

e. Please provide any further information in relation to your answers above
-

Page 7: Question 7

a. Which wall elements are likely to be affected by the proposed change – i.e. where they would pass as part of a cladding system in a BS 8414 test but would not meet the proposed Class A2 or better requirement (e.g. sheathing boards or vapour barriers)?
-

b. In England there are suggestions that since the Grenfell Tower fire, a high proportion of relevant building work is already using elements which meet Class A2 or better. What is your experience?
In Newport we are re cladding with A2 or better I have not been involved in cladding application before this

c. What is the impact of removing access to the BS 8414 for those buildings affected by the ban test likely to be?
-

d. How much extra cost would typically be involved in meeting the proposed new requirements (for buildings 18m or over) against a building which meets the current requirements? (Please provide any further details)
we are currently renewing cladding to buildings three blocks in total with an estimated cost of 3.5M

e. Please provide any further comments on the likely impact of this change for construction e.g. supply chains

e. Please provide any further comments on the likely impact of this change for construction e.g. supply chains

-

Page 8: Question 8

We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Personally I think that there are to many operatives working in the industry that are not properly trained or have lack of supervision when applying systems. We are having our three tower blocks re clad and all the operatives involved in the process including Building Control officers are to attend training days

Page 9: Submit your response

You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name	[redacted]
Position (if applicable)	[redacted]
Organisation (if applicable)	[redacted]
Address (including postcode)	[redacted]
Email address	[redacted]
Telephone number	[redacted]
Please state whether you are responding on behalf of yourself or the organisation stated above	[redacted]

Please indicate whether you are applying to this consultation as:

Local Authority

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