Response 1

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:
The Ban should apply to all buildings, regardless of it's height. Trying to justify something that is common sense is difficult so forgive my lack of eloquence here but why would any one build something out of something they know is a fire risk or has the possibility of catching or spreading fire? I understand the need to save money and financial risk but this should never be paramount to risk to lives.

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 building should be built out of flammable material, or a material that is likely to spread a fire.

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?

Don't know

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?

No

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

The ban should cover anything that has the potential to spread a fire from one area to another. Isolated parts are fine eg. If a balcony on the 14th floor catches fire, as long as the surrounding wall/material is not flammable then there is no risk of this fire spreading to other parts of the building.

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?

As long as there is minimal risk of spreading isolated incidents to the greater building/other areas.

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

Any buildings that have used combustible materials before the ban should be given a time period to correct this, Much like buildings have a period of time to make a change where asbestos has been identified. Fines should be applied to property owners who do not make changes in a timely manner. If a building needs to be rebuilt or subject to significant change, this should not be ignored due to cost.

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:

Common Sense, or the lack of. Why would anyone build a building that they know is a fire risk. My deepest sympathies go to the families and loved ones of those who try to argue otherwise.

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:

Building Occupier

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

Keep my response anonymous

Response 2

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
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?
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?
Don't know

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?

Don't know

Page 6: Question 6

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

Don't know

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

Don't know

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

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:
-

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

Response 3

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

No
Comments:
the height of the building does not matter, someone can die within a bungalow or ground floor flat!

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

combustible materials....that would need exceptional definition, wood is combustible (doors, windows, cladding); brick is combustible but not some stone.....plastic window frames/doors/cladding might not be combustible but give off toxic fumes.....be careful to include all forms of danger when revising the Law.

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?

we need to thoroughly investigate all forms of wall construction and window/doors therein, as well as the cladding, and arrive at our own conclusions as to what is acceptable, or not.

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 previously mentioned, the WHOLE needs to be fire retardant/resistant and ALL should not give of toxic fumes (eg arsenic, etc)

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?

I am not qualified to answer this one...speak to the experts, I am just speaking as a town Cllr concerned with building regulations

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

whether in situ, in planning, or in process of building - the safety of residents/workers must take priority over any expenditure 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)?

none - all must comply to revised laws

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?

I have no experience, but am concerned if current building work includes that which is known to be combustible or toxic.

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

not sure, financial surely, revision to look of building, hopefully.

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)

have no idea, and do not consider this to be primary over safety

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

this might produce more competition and certainly more research/testing - all of which provide extra employment opportunities to off set costs to building trade suppliers.

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]

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

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:

-

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

Keep my response anonymous

Response 4

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

Yes
Comments:
Should apply to all buildings. If permitted for low rise buildings, there will still be a market for (and availability of) cheaper combustible products which could then used inadvertently (or deliberately for cost saving reasons) on high rise 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

For same reason as given to question b.

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?

Don't know

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

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)?

Where the sum of all individual combustibility values for all components of the cladding system meet the A2 requirement, i.e. a cladding system that relies solely on correct assembly of the parts in order to pass the test would not be permitted.

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?

Not known.

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)
Not known.

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:
Designer / Engineer / Surveyor

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 5

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?

I believe this should be completed through Building regulations and be supported through enforcement agencies i.e Regulatory Reform (fire safety) Order 2005 who would use the guidance (Approved Document B volume 2)

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:
I beleieve it should apply to buildings over single storey buildings. The reasoning behind this is fire appliances and firefighting is easily managed at the lower level (fire services austerity measures and experiance in fire fighting). Also the wind loading in a building changes as building gets higher making it difficult to manage the firefighting (some fire services use positive pressure fans to push smoke outside - the higher the building the more difficult this firefighting procedure is).

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

Although residential buildings is a good starting point older buildings are being converted to residential buildings so doing it to all would ensure this work was completed during intial construction. By having completed in non domestic buildings would allow for buildings to be compliant with contingency measures for premises.

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?

Class 0 products or better - specifically tested and assessed.

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

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

Question 4b - fires will act differently different with balconies - consideration for fire stopping barriers to be increased in size?

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?

Components should be measures by there effectiveness to standards with the possibility of retrospective works being completed to the required standards required i.e Class 0.

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

Risk assessments should be completed to take into account the specific risk of fire spread on the external walls and any additional cladding that has been applied. This would allow owners of the building to identify the risk and introduce an adequate action plan and time line for replacement works to be completed.

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:

Landlord representative organisation

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 6

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

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

Although priority should be for domestic dwellings non domestic buildings e.g. office blocks or mixed use high rise buildings must be afforded the same level of protection from external fire spread

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

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)?

If the agreed standard is A2 or better, then the whole of the cladding system must meet that standard.

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?

if the building cladding construction has been designed to B S8414 and has been installed by a competent installation company then this is where the risk based approach using appropriate tools and techniques such as using the NFPA has a very good tool for carrying out such a risk assessment which has been rolled out in March of this year see following link link https://www.nfpa.org/-/media/Files/News-and-Research/Resources/Research-Foundation/Research-Foundation-reports/Building-and-life-safety/RFEFFECTReport.ashx

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

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

With regards to c above if the building cladding construction has been designed to B S8414 and has been installed by a competent third party accredited installation company then this is where the risk based approach using appropriate tools and techniques and that the fire risk assessment is suitably annotated.

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 extra costs will be dependent on the type and number of buildings found and can only be quantified by expert surveying and QS

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:

Designer / Engineer / Surveyor

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 7

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)?
Don't know

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?
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?
Don't know

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

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 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

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 8

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

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

It should apply to all buildings over 18 meters, additionally it should apply to ALL buildings occupied by vulnerable people ie hospitals, old people's accommodation, and schools with children in etc

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?

Don't know

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

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

Only fully non combustible insulation, that has passed “Full Scale Indepentant” tests should be permitted

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

Insulation and building materials made from oil based hydrocarbons should banned in any applications where their use could contribute to the release of toxic fumes and or the spread of fire

Note more people die in fire due to the inhalation of toxic fumes from products made from oil based hydrocarbons than die from actually being burnt by them

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?

Use fully non combustible insulation products such as those made from stone wool

stone wool is made from 97% to 99% Diabase Dolomite stones. Rock don’t burn unlike oil bases hydrocarbons which do burn very well

Note stone wool is actually made by the company Rockwool in South Wales, so it’s use will support the Welsh economy and Welsh jobs as well as protecting Welsh peoples lives

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?

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

If in future a building burns down and people (sadly) are killed, it will be of little comfort to their friends and relatives to be told it was knowingly build in an unsafe way because construction had already started when the ban was introduced

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)?

Passing Proper robust indepentant full scale tests should be the only way to get products approved for use

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?

Small scale tests are inadequate
Fire consultant “assessments” are no substitute for full scale tests
Some test stations are not fully independent as they derive their income from the payments made by manufacturers
Some manufacturers have too much influence on the build up of the rig that is to be tested at the test station
Some manufacturers repeatedly fail and then keep retesting until they get a pass

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)

Considerably Less that one percent of the total cost of the building

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

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 9

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)?

Don't know

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:
I believe that height is almost irrelevant and the number of floors is a better measure. With this in mind the threshold should be 3+ stories.

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

Some high-rise non-residential buildings need to be included where evacuation could be difficult eg. hospitals.

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?
Don't know

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

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

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]

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

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

Response 10

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

Yes
Comments:
It should apply to 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

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?

Don't know

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

Safety should come first.

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?

Not sure but there should be no loop holes.

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 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]

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

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:

Building Occupier

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

Keep my response anonymous

Response 11

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:
N/A

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

We would consider that any ban should affect all buildings over 18m to avoid confusion as well as preventing any subsequent issues that may be caused by future changes of use to the building.

Clarification is also required in respect of where and how the building should be measured to determine if it is affected by the ban. Diagram 40 of Approved Document B Volume 2 refers to the overall height of the building whilst paragraph 12.7 refers to any building with a floor level over 18m.

We would also recommend that consideration should be given to buildings and development where fire brigade access to the external façade is restricted (e.g. podium decks, courtyards, narrow access etc.) and whether similar restrictions should apply to these buildings. If this was the case careful consideration should be given to the conditions under which this would be applied to ensure a consistent approach.

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?

NHBC agrees that the ban should cover the entire wall construction inside to outside with the exception of certain minor components detailed in response to Q7.

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

NHBC would recommend that consideration is given to the impact of the proposed ban on all components and elements which may be fitted to the external face of the external wall.
Items that would need consideration would be winter gardens, living walls, green and brown roofs, warm deck terracing etc.

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?

NHBC would consider the following components should be exempted:
1. Gaskets, seals, double glazing spacers, clips – assuming they are limited in number, and don't pass through a cavity barrier, thermal breaks (e.g. to extruded curtain wall sections, helping hand brackets,

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

cantilevered balcony systems), or where this is necessary, they have been shown not to propagate flame passage into the adjoining compartment.
2. Fillers to structural lintels over openings meant to limit any thermal bridging
3. Cavity trays, DPCs, VCLs / breather membranes (where sandwiched between non-combustible layers), EDPM barriers.

NHBC would also recommend that further consideration be given to the following elements/components or guidance:
1. Windows where they do not span between compartments
2. The effect of the ban on insulation contained within two layers of masonry in accordance with Diagram 34 of ADB V2.
3. Consideration should be given to materials located internal to a minimum A2 classification sheathing board that spans between compartment floors (typically the inner leaf of a wall). This may include structural timber elements or combustible materials being used to achieve required “U” values.
4. Internal wall panelling or applied internal wall build ups, timber noggins or fixing boards.
5. Timber frame construction
6. Timber frame infill panels to concrete frame buildings
7. Cross Laminated Timber frames
8. Living walls
9. ICF
10. SIPS
11. Guidance is required on how ventilation grilles/outlets and associated ductwork should be treated. This should be consistent with guidance provided for penetrations passing between compartments.
12. What is the status of M, E and P services within or fixed to the face of external walls. No guidance is provided
13. Pre-cast balconies and other similar products containing void formers to reduce weight.
14. Warm roof construction forming the decks of balconies or external terraces

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?

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

NHBC would add the following comments:
• Question 6 (b) –
o NHBC supports the proposed ban applying to alterations to existing buildings but would draw the Ministry’s attention to advice provided in Advice Note 11 (Reference MHCLG/BSP/advice note/11/280218, dated 27

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

February 2018) in respect retaining existing insulation.
o The wording in Regulation 6 (1) (c) should be revised to be consistent and align with the outcomes of this consultation. E.g. only applies it to buildings exceeding 15m
• Question 6 (c) - For consistency with other Building Regulation changes, the proposals should have clear transitional provisions consistent with previous regulation changes to allow industry to plan and implement in a sensible way. For some developments pre-commencement design could have been in progress for a considerable time and off site manufacture often commences up to 12 months ahead of the onsite construction works. In the case of volumetric MMC construction, by the time the physical start on site occurs, a significantly large volume of offsite product could have been designed and manufactured.
• Question 6 (d) – Some large complex developments may be under construction for several years. Clear guidance on the definition of 'building work commencement' would assist industry in planning for the implementation of this proposal and how it might affect phased developments, developments with shared podium or basements etc.

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)?

NHBC would consider the following elements would be affected:
• Sheathing boards
• PIR/PUR Insulation boards
• Any materials listed in answer to Q7 if not excluded
• Individual combustible components contained in wall systems which have currently achieved a BR135 classification after undertaking a BS8414:1 or 2 test as referenced in published test data at https://www.bre.co.uk/regulatory-testing .

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 tests conducted by government following Grenfell provided new information on the performance of tested materials in complete wall systems. This created questions over the in-service performance of untested systems. In view of this uncertainty, NHBC introduced a revised policy for all new buildings and would only accept the following as demonstrating compliance with Building Regulations and NHBC Standards:
• The use of materials of limited combustibility as stated in Table A7 of Approved Document B for all elements of the cladding systems both above and below 18m. This includes the insulation, internal lining board and the external facing material.
• External walls should meet the performance criteria given in the BRE Report Fire Protection of external thermal insulation for walls of multi storey buildings (BR 135) for cladding systems using full scale test data from BS 8414-1:2002 or BS 8414-2:2005.

Since the implementation of this policy in August 2017 NHBC have seen a trend for builders to switch to non-combustible materials where possible.

Of the projects received since August we have seen the following:
• 50% - still awaiting details of façade to be used
• 40% - Confirmed all materials will be materials of limited combustibility
• 5% - Using systems tested against BS8414:2 and achieved a BR135 classification
• 5% - Brickwork façade with combustible insulation**

**NHBC has been working with industry and we are aware of a BS8414:2 test which has been undertaken on a brickwork façade with a combustible insulation in the cavity. The final results have yet to be published but advance results released by the manufacturer would suggest that the make-up will achieve a BR135 classification.

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

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

NHBC would consider the following implications –
• An initial impact in restricting the types of façade treatments available until further facades treatments are developed
• There may be a significant impact on buildings under construction depending on the transitional provisions which are applied.
• Most A1 and A2 insulation products have lower thermal resistance compared to currently used materials. To achieve current thermal efficiency wall thicknesses may have to increase, increasing the overall building footprint or reducing the net area of rooms.

NHBC would also urge government to consider the impact on existing buildings which have used systems which have been tested to BS 8414:1 or 2 and achieved a BR135 classification. The ban could cause issues with property blight or gaining property insurance.

NHBC would draw the government's attention to proposals being consulted on in Scotland as part of the Scottish Governments consultation - Building Standards Compliance and Fire Safety – a consultation on making Scotland's buildings safer for people. The consultation proposes to retain the option for external wall systems on buildings over 11m to be tested to BS 8414 (and BR135). The review panel concluded that the BS 8414 test was robust when compared with other full scale tests around the world but understood that the standard is likely to be reviewed following the Grenfell Tower fire.

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)

NHBC has no experience in this area

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

NHBC would provide the following additional comments:
1. NHBC agree that combustible materials in external walls should be banned however we would comment that the use of the word CLADDING may not be a clearly understood term and perhaps 'External Envelope' would be more appropriate. [Definition: Cladding is the application of one material over another to provide a skin or layer].
2. Clarification is required in respect of where and how the building should be measured to determine if it is affected by the ban. Diagram 40 of Approved Document B Volume 2 refers to the overall height of the building whilst paragraph 12.7 refers to any building with a floor level over 18m.
3. NHBC welcomes the proposal to adopt a single classification system and would urge government to work with the devolved governments in Wales and Scotland to ensure that this is consistent across the UK.
4. With increasing globalisation it is increasingly common to receive fire tests from outside of Europe; instances have come to light where the results of the test are questionable. Clearer guidance on acceptable world bodies would be welcomed.
5. NHBC would draw the government's attention to proposals being consulted on in Scotland as part of the Scottish Governments consultation - Building Standards Compliance and Fire Safety – a consultation on making Scotland's buildings safer for people. The consultation proposes to retain the option for external wall systems on buildings over 11m to be tested to BS 8414 (and BR135). The review panel concluded that the BS 8414 test was robust when compared with other full scale tests around the world but understood that the standard is likely to be reviewed following the Grenfell Tower fire.
6. In order to achieve thermal requirements and comply with a ban of combustible insulation it is likely that this may result in increased cavity widths. In many cases current cavity widths are at the extent of available tested cavity barriers, and this may create difficulties in specifying fully tested cavity fire barriers in the short to medium term.
7. The substitution of high thermal efficiency, vapour resistant insulation for less efficient, vapour permeable insulation has the potential to move the thermal gradient and increase the risk of interstitial condensation within the inner wall leaf.

8. Lintels and other supporting bracketing will need to be revised which may increase the weight of the supporting framework which over the height of a tall building could have major implications on the size of the overall frame.
9. For existing buildings there appears to be a degree of uncertainty in relation to the acceptability of retaining

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

insulation in position when carrying out remedial works. NHBC's view, supported by government guidance, is that any remedial works carried out can satisfy the current regulations by adopting a solution where all elements are of limited combustibility or adopting a system that has successfully obtained BR135 classification (Reference Information Note 1 DCLG/BSP/Information Note/01/111217 Dated 11 December 2017).
Subsequent advice notes issued by government, and in particular Advice Note 11 (Reference MHCLG/BSP/advice note/11/280218, dated 27 February 2018) provide information of government testing which passed the BS8414:1 test indicating the acceptability of PIR foam under Test 5. In addition, that particular advice note includes an update providing information on two other design variations of a cladding system incorporating ACM (Category 2) with Phenolic Foam insulation that have been tested to BS8414:1 and have achieved a BR135 classification. The advice note also references the BRE's online catalogue of cladding systems that have passed large scale testing including all forms of insulation material.
This has set out government's position in relation to the acceptability of both materials of limited combustibility and tested cladding systems. Since its issue, the guidance is being applied in practice, with NHBC responding by promoting this government guidance to our registered builders.
10. A further area of concern for existing buildings is the proposal to relax the requirements of Part L in order to accommodate replacement insulation. We believe that this is unnecessary as, for the reasons set out above; we would expect remedial schemes to be designed in accordance with tested systems, whilst retaining the existing insulation is likely to be a speedier route to ensuring fire safety in affected blocks.
In addition, we believe that the criteria for consequential improvements as a result of Renovation of Thermal Elements is already suitably detailed within Approved Document L and would only apply where the threshold level of 0.7 W/m2/K is currently not achieved. This should only affect buildings built prior to the 1985 regulations.
A relaxation of Part L requirements could introduce contractual complications for building owners and leaseholders (including in relation to the onward sale of properties) and possibly result in disputes with regards to increased costs for space heating for consumers.
11. The impact of an outright ban without the ability to test should be considered in respect of the public's perception of existing buildings, the potential for property blight as well as insurance risk.

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:

NHBC would recommend that any policy changes are aligned across Wales and England to aid industry in a consistent approach.

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:

Please indicate whether you are applying to this consultation as:
Building Control Approved Inspector

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 12

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

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

We would consider that any ban should affect all buildings over 18m to avoid confusion as well as preventing any subsequent issues that may be caused by future changes of use to the building.

Clarification is also required in respect of where and how the building should be measured to determine if it is affected by the ban. Diagram 40 of Approved Document B Volume 2 refers to the overall height of the building whilst paragraph 12.7 refers to any building with a floor level over 18m.

We would also recommend that consideration should be given to buildings and development where fire brigade access to the external façade is restricted (e.g. podium decks, courtyards, narrow access etc.) and whether similar restrictions should apply to these buildings. If this was the case careful consideration should be given to the conditions under which this would be applied to ensure a consistent approach.

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?

BCA agrees that the ban should ideally cover the entire wall construction inside to outside with the exception of certain minor components detailed in response to Q7. However we would also ask that further careful consideration should be given to the elements/components and guidance listed in Q7 that a full ban could affect to ensure that the outcomes are fully understood.

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

BCA would recommend that consideration is given to the impact of the proposed ban on all components and elements which may be fitted to the external face of the external wall.
Items that would need consideration would be winter gardens, living walls, green and brown roofs, warm deck terracing etc.

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?

BCA would consider the following components should be exempted:
1. Gaskets, seals, double glazing spacers, clips – assuming they are limited in number, and don't pass through a cavity barrier, thermal breaks (e.g. to extruded curtain wall sections, helping hand brackets, cantilevered balcony systems), or where this is necessary, they have been shown not to propagate flame passage into the adjoining compartment.
2. Fillers to structural lintels over openings meant to limit any thermal bridging
3. Cavity trays, DPCs, VCLs / breather membranes (where sandwiched between non-combustible layers), EDPM barriers.

BCA would also recommend that further consideration be given to the following elements/components or guidance:
1. Windows where they do not span between compartments
2. The effect of the ban on insulation contained within two layers of masonry in accordance with Diagram 34 of ADB V2.

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

3. Consideration should be given to materials located internal to a minimum A2 classification sheathing board that spans between compartment floors (typically the inner leaf of a wall). This may include structural timber elements or combustible materials being used to achieve required “U” values.
4. Internal wall panelling or applied internal wall build ups, timber noggins or fixing boards.
5. Timber frame construction
6. Timber frame infill panels to concrete frame buildings
7. Cross Laminated Timber frames
8. Living walls
9. ICF
10. SIPS
11. Guidance is required on how ventilation grilles/outlets and associated ductwork should be treated. This should be consistent with guidance provided for penetrations passing between compartments.
12. What is the status of M, E and P services within or fixed to the face of external walls. No guidance is provided
13. Pre-cast balconies and other similar products containing void formers to reduce weight.
14. Warm roof construction forming the decks of balconies or external terraces

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?

Yes

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

BCA would add the following comments:
• Question 6 (b) –
o BCA supports the proposed ban applying to alterations to existing buildings but would draw the Ministry’s attention to advice provided in Advice Note 11 (Reference MHCLG/BSP/advice note/11/280218, dated 27 February 2018) in respect retaining existing insulation.
o The wording in Regulation 6 (1) (c) should be revised to be consistent and align with the outcomes of this consultation. E.g. only applies it to buildings exceeding 15m
• Question 6 (c) - For consistency with other Building Regulation changes, the proposals should have clear transitional provisions consistent with previous regulation changes to allow industry to plan and implement in a sensible way. For some developments pre-commencement design could have been in progress for a considerable time and off site manufacture often commences up to 12 months ahead of the onsite construction works. In the case of volumetric MMC construction, by the time the physical start on site occurs, a significantly large volume of offsite product could have been designed and manufactured. An immediate ban could create significant and complex liability issues.
• Question 6 (d) – Some large complex developments may be under construction for several years. Clear guidance on the definition of 'building work commencement' would assist industry in planning for the implementation of this proposal and how it might affect phased developments, developments with shared podium or basements etc.

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)?

BCA would consider the following elements would be affected:
• Sheathing boards
• PIR/PUR Insulation boards
• Any materials listed in answer to Q7 if not excluded
• Individual combustible components contained in wall systems which have currently achieved a BR135 classification after undertaking a BS8414:1 or 2 test as referenced in published test data at https://www.bre.co.uk/regulatory-testing .

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?

Since the Grenfell fire BCA have seen a trend for builders to switch to non-combustible materials where possible.

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

BCA would consider the following implications –
• An initial impact in restricting the types of façade treatments available until further facades treatments are developed
• There may be a significant impact on buildings under construction depending on the transitional provisions which are applied.
• Most A1 and A2 insulation products have lower thermal resistance compared to currently used materials. To achieve current thermal efficiency wall thicknesses may have to increase, increasing the overall building footprint or reducing the net area of rooms.

BCA would also urge government to consider the impact on existing buildings which have used systems which have been tested to BS 8414:1 or 2 and achieved a BR135 classification. The ban could cause issues with property blight or gaining property insurance.

BCA would draw the government's attention to proposals being consulted on in Scotland as part of the Scottish Governments consultation - Building Standards Compliance and Fire Safety – a consultation on making Scotland's buildings safer for people. The consultation proposes to retain the option for external wall systems on buildings over 11m to be tested to BS 8414 (and BR135). The review panel concluded that the BS 8414 test was robust when compared with other full scale tests around the world but understood that the standard is likely to be reviewed following the Grenfell Tower fire.

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)

BCA has no experience in this area

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

BCA would provide the following additional comments:
1. BCA would comment that the use of the word CLADDING may not be a clearly understood term and perhaps 'External Envelope' would be more appropriate. [Definition: Cladding is the application of one material over another to provide a skin or layer].
2. Clarification is required in respect of where and how the building should be measured to determine if it is affected by the ban. Diagram 40 of Approved Document B Volume 2 refers to the overall height of the building whilst paragraph 12.7 refers to any building with a floor level over 18m.

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

3. BCA welcomes the proposal to adopt a single classification system and would urge government to work with the devolved governments in England and Scotland to ensure that this is consistent across the UK.
4. With increasing globalisation it is increasingly common to receive fire tests from outside of Europe; instances have come to light where the results of the test are questionable. Clearer guidance on acceptable world bodies would be welcomed.
5. BCA would draw the government's attention to proposals being consulted on in Scotland as part of the Scottish Governments consultation - Building Standards Compliance and Fire Safety – a consultation on making Scotland's buildings safer for people. The consultation proposes to retain the option for external wall systems on buildings over 11m to be tested to BS 8414 (and BR135). The review panel concluded that the BS 8414 test was robust when compared with other full scale tests around the world but understood that the standard is likely to be reviewed following the Grenfell Tower fire.
6. In order to achieve thermal requirements and comply with a ban of combustible insulation it is likely that this may result in increased cavity widths. In many cases current cavity widths are at the extent of available tested cavity barriers, and this may create difficulties in specifying fully tested cavity fire barriers in the short to medium term.
7. The substitution of high thermal efficiency, vapour resistant insulation for less efficient, vapour permeable insulation has the potential to move the thermal gradient and increase the risk of interstitial condensation within the inner wall leaf.

8. Lintels and other supporting bracketing will need to be revised which may increase the weight of the supporting framework which over the height of a tall building could have major implications on the size of the overall frame.
9. For existing buildings there appears to be a degree of uncertainty in relation to the acceptability of retaining insulation in position when carrying out remedial works. BCA's view, supported by UK government guidance, is that any remedial works carried out can satisfy the current regulations by adopting a solution where all elements are of limited combustibility or adopting a system that has successfully obtained BR135 classification (Reference Information Note 1 DCLG/BSP/Information Note/01/111217 Dated 11 December 2017).
Subsequent advice notes issued by UK government, and in particular Advice Note 11 (Reference MHCLG/BSP/advice note/11/280218, dated 27 February 2018) provide information of government testing which passed the BS8414:1 test indicating the acceptability of PIR foam under Test 5. In addition, that particular advice note includes an update providing information on two other design variations of a cladding system incorporating ACM (Category 2) with Phenolic Foam insulation that have been tested to BS8414:1 and have achieved a BR135 classification. The advice note also references the BRE's online catalogue of cladding systems that have passed large scale testing including all forms of insulation material.
This has set out government's position in relation to the acceptability of both materials of limited combustibility and tested cladding systems. A further area of concern for existing buildings is the proposal to relax the requirements of Part L in order to accommodate replacement insulation. We believe that this is unnecessary as, for the reasons set out above; we would expect remedial schemes to be designed in accordance with tested systems, whilst retaining the existing insulation is likely to be a speedier route to ensuring fire safety in affected blocks.
In addition, we believe that the criteria for consequential improvements as a result of Renovation of Thermal Elements is already suitably detailed within Approved Document L and would only apply where the threshold level of 0.7 W/m2/K is currently not achieved. This should only affect buildings built prior to the 1985 regulations.
A relaxation of Part L requirements could introduce contractual complications for building owners and leaseholders (including in relation to the onward sale of properties) and possibly result in disputes with regards to increased costs for space heating for consumers.
10. The impact of an outright ban without the ability to test should be considered in respect of the public's perception of existing buildings, the potential for property blight as well as insurance risk.

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:

BCA would recommend that any policy changes are aligned across Scotland and England to aid industry in a consistent approach.

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	Paul Everall
Position (if applicable)	BCA Chair
Organisation (if applicable)	Building Control Alliance
Address (including postcode)	c/o LABC 3rd Floor, 66 South Lambeth Road, London SW8 1RL
Email address	kirsty.mckee@labc.co.uk
Telephone number	02070916860
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:

Construction professional

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

kirsty.mckee@labc.co.uk

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

Response 13

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?
Yes

Page 3: Question 3

a. Do you agree that the European classification system should be used?
Don't know

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?
Don't know

Page 6: Question 6

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

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	Sarah King
Position (if applicable)	Deputy Clerk
Organisation (if applicable)	Caldicot Town Council
Address (including postcode)	Town Council Office, Sandy Lane, Caldicot, NP26 4NA
Email address	towncouncil@caldicottc.org.uk
Telephone number	01291 420441
Please state whether you are responding on behalf of yourself or the organisation stated above	Caldicot Town Council support banning the use of combustible materials in teh external walls of high-rise residential buildings

Please indicate whether you are applying to this consultation as:

Local Authority

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

Response 14

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

f. Please provide any further information in relation to your answers above
The ban should apply to any building to which the Regulatory Fire Safety order applies, irrespective of height.

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?
No

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

Class A1 only (non combustible). It will remove all ambiguity in interpretation and application.

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?

Limiting the exemption to components that are non critical in terms of contributing to the structural integrity, stability and performance of the system.

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

Effective transitional arrangements will need to be implemented with no "blanket coverage on commencement.

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)?

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)?

Cladding, insulation, brackets, gaskets, sheathing boards, rails, bolts, screws and retaining clips.

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?

Limited experience in terms of number of proposals. Instance of design change to achieve improvement from limited combustibility to non combustible.

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

Buildings would be non compliant unless they have class A rated materials. It has been suggested that BS8414 test is not fit for purpose and that the crib fire does not represent a true fire load of modern materials.

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)

Costs unknown ..... unable to quantify but will be significantly higher.

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

Massive impact on industry manufacturers and material suppliers for high rise buildings. Likely to be significant cost implications. Increase in structural loadings. Impact on design input. Will drive innovation. Will remove ambiguity. Will instill confidence in the end product. Will create demand for up skilling

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	Peter Richards
Position (if applicable)	Building Control manager
Organisation (if applicable)	Swansea City Council
Address (including postcode)	Room G.4.1, Civic Centre, Oystermouth Road, Swansea, SA1 3SN
Email address	peter.c.richards@swansea.gov.uk
Telephone number	01792 635622
Please state whether you are responding on behalf of yourself or the organisation stated above	The above organisation

Please indicate whether you are applying to this consultation as:

Local Authority

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