

Ref: 0629/PAC

Mr Clive Betts MP
Chair, Housing, Communities and Local Government Committee
House of Commons
London
SW1A 0AA

29 June 2018

Re: further evidence concerning the Independent Review of Building Regulations and Fire Safety

Dear Mr Betts:

Thank you again for the invitation to provide the Committee oral evidence on 27 June. Attached please find additional evidence and clarification on some of the points raised at the session.

We would be pleased to help you and your colleagues further with any of these points or indeed any other information that you think we may be able to provide.

With kind regards.

Yours sincerely,



Peter Caplehorn RIBA
Deputy Chief Executive and Policy Director

attachment

29 June 2018

Re: further evidence concerning the Independent Review of Building Regulations and Fire Safety

A point of clarification

My colleagues listening to the evidence session reminded me that I gave the impression our policy was to simply ban combustible materials. In fact, we welcome the Government's [consultation on banning the use of combustible materials in the external walls of high-rise residential buildings](#) in order to first identify the issues around this topic from a practical position. The detailed application of such a ban is in need of a review.

The CPA also believes that reference and adherence to the current regulation B4 already sets the position for this topic, though clarification around that will help.

We also wish to point out that, at this time, the CPA has been unable to agree a position across our membership¹ on a complete ban (whatever that is defined as), although all members are agreed that the use of materials such as ACM should not continue on high rise facades.

What we do seek is to create a situation where buildings are safe and people feel safe as quickly as possible.

Further Evidence

Following are some further points that we would like to bring to the Committee's attention:

Some criticism has been levelled at the Independent Review as being either too limited or not bold enough. We feel the Review should be considered bearing in mind the original remit that clearly placed limits on the scope.

Throughout the Review's final report, however, and in particular after nearly every recommendation in Appendix A, it emphasised the Government should look to consider the particular recommendation for wider application. We thoroughly support this perspective.

While cladding is critical and so important to resolve, we should not lose focus with the other fire-related areas that have demonstrated similar points of catastrophic failure. These include:

Fire doors frames and performance, both for new build and in use, especially ensuring that performance is maintained throughout the life.

Fire risk assessments ("FRA's") have a very poor reputation. Most experts we have spoken to in reviewing FRA's have concluded that only an extremely small number are in any way proficient. Additionally there is currently no real incentive to act on any recommendations.

The same is true following a fire service visit, where there is considerable difficulty to ensure recommended works are carried out.

¹ The Construction Products Association represents the UK's manufacturers and distributors of construction products. The sector employs approximately 333,000 people across 23,000 companies, and accounts for an annual turnover of £56 billion. The CPA represents nearly 85% of this sector by value. A list of our members can be found on our website: www.constructionproducts.org.uk.

Passive fire protection measures, such as the quality of compartmentation, are continually seen as weak. Inspections from experts, building maintenance operatives and others all indicate the level of quality for compartments is woefully below that expected.

As compartments are currently one of the primary defences against fire spread, it is critical that more focus and effort is applied. Many products are available to ensure compartments work as intended; crucially, these must be installed exactly as the manufacturer intends. Often, cheaper alternatives or incorrect products are used. We have reports that in circumstances where products look similar (foam gap fillers, intumescent or where hidden by building finishes) little or no real compartment performance is achieved. This represents another, potentially disastrous, high risk area.

Active fire protection measures are often talked about, especially sprinklers. These can be of great benefit but have to be designed, specified and installed with more attention to quality than any other fire related measure. Where they are considered, sprinklers need to be realistically appraised as the right solution and measures put in place to ensure performance is demonstrated and the system is maintained and checked throughout the building's life.

'Desk top studies'

Extrapolation in lieu of testing is used in all sort of situations, e.g.; accelerated weathering of materials, fire door testing and works that are too big to apply a test. These have all worked successfully for years. Fundamental to that success is to ensure fire issues are linked to direct relationships with tests. Measures to ensure both the quality of the analysis and the competence of the author are needed and would then ensure this practical process can continue and produce safe results that attract confidence.

Innovation

Many of the issues that are being discussed are potential areas for innovation. While we currently see problems and efficiencies, we should push for development of new approaches, techniques and solutions. The manufacturing of construction products is one of the most innovative areas in the construction industry; however, this rarely reaches the headlines and therefore largely continues unseen.

Culture

Custom and practice needs challenging. All too often the race to fastest and cheapest is king. HMG procurement rules currently do not help. Responsibility, authority, quality, delivery, performance and efficiency are all driven by culture.

Digitalisation

The CPA, along with the [British Standards Institution](#) and [NBS](#), have recently developed a process to link a product to a digital registry. An indicator code or mark on the product allows interrogation by a smart phone that links to a purpose-designed website identifying the product with absolute certainty and in perpetuity. This makes the identification of products during design, construction and after completion certain.

This system is market ready and will be launched later this year. We are pleased to note the Independent Review referenced this initiative in the final report.

The CPA is also working on a system called LEXiCON that will enable all products to be described digitally using the same definitions and the same format. This will make comparison and identification of relative performance clear and accurate.

A new standard is also being produced in conjunction with BSI to support the standardisation of product information in digital format.

Clarity of Product Information

Following the call in the Review for product information to be clearer, easier to understand and distinct from marketing information, work is underway with our members. This is at a very early stage but executive members are keen to show leadership and develop answers to these issues.

[end]