

Housing, Communities and Local Government Committee

House of Commons, London SW1A 0AA

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The Rt Hon James Brokenshire MP
Secretary of State for Housing, Communities and Local Government
Ministry of Housing, Communities and Local Government
Fry Building
2 Marsham Street
London
SW1P 4DF

30 April 2018

Dear James,

Re: Consultation on proposed changes to existing guidance on assessments in lieu of a fire test (desktop studies)

Firstly, congratulations on your appointment as Secretary of State. The Committee is very much looking forward to engaging with you in a constructive way on the wide-range of important issues now within your responsibilities.

I am writing to you now following the letter of your predecessor of 10 April 2018 regarding the Ministry's consultation into proposed changes to existing guidance on desktop studies. Members of the select committee have discussed this issue and, on their behalf, I am writing to ask that the Ministry considers this letter, and the other correspondence and evidence referenced, as part of its consultation.

The Committee is concerned about the reliance on desktop studies in the construction industry. We feel that their use is particularly troubling in the context of the ongoing ambiguity concerning the use of combustible materials in the cladding on high-rise buildings (as highlighted in [recent correspondence with the Minister of State for Housing](#)). We are concerned that the over-use of desktop studies may be a contributory factor to a weaker, less stringent regulatory regime and increases the likelihood of dangerous materials being used on high-rise residential buildings.

In our public evidence session with Dame Judith Hackitt on [18 December 2017](#), she told us how the ability to substitute one material for another in a desktop study meant that, over time, the materials assessed through such reviews "can start to drift away from materials that were thoroughly tested and approved for use" in a real environment (Q18). [Another expert](#) told us that desktop studies were "an impossible guess about how a cladding system will perform in a fully developed fire" compared to the more balanced view provided by a full fire engineering assessment.

This is clearly dangerous. We therefore believe that, for as long as it is permitted to use combustible materials in the cladding of high-rise buildings, the use of desktop studies should be prohibited. In response to the specific consultation question regarding whether the Government should prohibit the use of assessments in lieu of tests either for all fire test classifications or for fire test classifications relating to the BS 8414 full-scale cladding test, it therefore follows that we believe there is clear merit in doing so.

However, we note that these particular concerns would be addressed if the use of combustible materials were simply prohibited from the cladding systems of high-rise buildings. Whilst we anticipate that the Independent Review is likely to conclude in favour of a risk-based approach to future building regulations and guidance, we have stated on a number of occasions now our strongly held view that some prescription will be necessary, and a regulatory system that does not explicitly prohibit combustible materials from the external cladding of high-rise buildings would be a serious mistake.

We hope that the concerns of the select committee will be taken into consideration and reflected in the finalised guidance.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Clive Betts', with a large, stylized initial 'C' at the start.

Clive Betts MP
Chair, Housing, Communities and Local Government Committee