Insulated Render and Cladding Association's response to the Government Consultation on *"Banning the use of combustible materials in the external walls of high-rise residential buildings"*

Executive Summary

The Insulated Render and Cladding Association (INCA) shares the desire of the Government to ensure that an event like the one at Grenfell Tower never happens again in the UK. It recognises the concerns of the Government and the public, and is strongly aligned with this outcome.

As a membership organisation, INCA exists to represent the External Wall Insulation industry. The Association has not been able to reach a consensus view in respect of banning the use of combustible materials in high-rise buildings, despite extensive consultation with members. The views shared in this response are therefore the views of the majority; some members did support the ban, and may be submitting their own responses.

INCA supports Dame Judith Hackitt's report 'Building a Safer Future' and agrees that there are failings in the construction and regulatory system.

Addressing the use of unsuitable and combustible cladding is key to achieving our shared objective of high quality buildings in which residents are safe and feel safe. However, cladding must be considered as part of the overall system and not in isolation. Materials that are non-combustible or of limited combustibility combined in an unsuitable system or designed and installed incorrectly can create other significant problems.

INCA recommends that the response to this consultation is a pragmatic one, based on evidence and with safety at its core.

INCA recommends:

To ONLY permit the use of systems, materials or products as cladding in buildings over an agreed height where:

- A system has a certificate of testing to BS 8414 or an accredited and audited fire test issued by an approved testing authority such as those which exist in other European countries
- The system is specified by a certified, competent designer
- The system has clear (pictorial) installation instructions, specific to the project, including the particular fixtures, fittings and any safety features
- The system is installed by a competent installer
- The end to end process is fully audited

Consultation Questions – INCA Responses

Introduction (Questions 1 & 2)

This response is submitted by the Insulated Render and Cladding Association, which is the representative organisation of the External Wall Insulation Industry in the UK. The Association is also a member of Build UK, and through membership has contributed to the work of the Industry Response Group.

INCA supports the findings of Dame Judith Hackitt's report, 'Building a Safer Future'. It is clear that there are failings in the construction and regulatory system. Addressing the use of unsuitable and combustible cladding is key to achieving our shared objective of high quality buildings in which

residents are safe and feel safe. However, cladding must be considered as part of the overall system and not in isolation to avoid creating other significant problems such as structural safety issues, cold bridging and moisture penetration.

Question 3
a) Do you agree that combustible materials in cladding systems should be banned?
b) Should the ban be implemented through changes to the law?
c) If no, how else could the ban be achieved?

INCA does not believe that combustible materials in cladding systems should be banned. No material exists in isolation from other components, and each element must be considered as part of the overall system. Materials that are non-combustible or of limited combustibility combined in an unsuitable system or designed and installed incorrectly can create other significant problems.

Question 4.
Do you agree that the ban should apply:

a) To buildings 18m or over in height?
b) Throughout the entire height of the wall i.e. both below and above 18m?
c) To high-rise residential buildings only?
d) To all high-rise non-residential buildings, e.g. offices and other buildings, as well as residential buildings?

'Building a Safer Future' refers to 10 storeys as the threshold for high-rise residential buildings, a height determined since the incident at Grenfell Tower, whilst the Building Regulations refer to 18 metres. The height of 18m specified in the Building Regulations is a well-established industry standard, and INCA supports its continued use.

For buildings above the agreed height, any requirements should apply throughout the height of the building. The requirements should apply to high-rise residential buildings only.

Question 5.
a) Do you agree that the European classification system should be used and do you consider that Class A2 or better is the correct classification for materials to be used in wall construction?
b) If no, what class should be allowed in wall construction and why?

The European classification is deemed by INCA to be a sufficiently robust classification for systems suitable for use in high-rise buildings. It is generally accepted that A2 or better are classifications which do not propagate the spread of fire.

INCA proposes only to permit this classification or systems that have passed a European accredited and audited full-scale fire test issued by an approved testing authority such as those that exist in other European countries.

Question 6.
a) Do you agree that a ban should cover the entire wall construction?
b) If no, what aspects of other wall should it cover?
c) Should a ban also cover window spandrels, balconies, brise soleil and similar building elements?

This question appears to move the proposal to ban combustible materials, products and systems used in cladding systems to a proposal to ban combustible materials, products and systems in other elements of a building, namely the complete wall system. This is a significant difference and it should be clearly consulted on if that is indeed the intention.

INCA has no reason to believe that the standards currently applying to wall construction, windows, balconies etc. are no longer appropriate. The focus of this exercise should remain on addressing the standards and requirements in relation to cladding unless the Government has identified concerns elsewhere.

Question 7.
a) Do you agree that a limited number of wall system components should, by exception, be exempted from the proposed ban?
b) If yes, what components should be included on an exemption list and what conditions should be imposed on their use?
c) Would you recommend an alternative way of achieving the policy aims stated above?

INCA believes that BS8414 or an accredited and audited fire test issued by an approved testing authority, such as those which exist in other European countries, is effective. If a fully tested systems approach is taken, there should be no exemptions from the ban.

Question 8.
Do you agree that:
a) A risk based approach is appropriate for existing buildings?
b) The ban should apply to proposed alterations to existing buildings including overcladding?
c) The ban should extend to projects that have been notified before the ban takes effect but work has not begun on site?
d) The ban should not affect projects where building has begun?

INCA agrees that a risk based approach is appropriate for existing buildings and any requirements introduced should apply to proposed alterations including projects where work has not yet begun.

Question 9.
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) We understand that since the Grenfell Tower fire, a high proportion of relevant building work is already using elements which meet Class A2 or better. How frequently are elements which do not meet the proposed requirement, as identified in question 3, currently being used on buildings in scope?
c) What the impact of removing access to the BS 8414 for those buildings affected by the ban test is likely to be?
d) What types of buildings 18m or over are likely to be affected by this change (e.g. hotels, residential, student accommodation)? What proportion of each type would likely be affected by the proposed change?
e) How much extra cost would typically be involved in meeting the proposed new requirements over and against a building which meets the current requirements? (Please provide any further details.)
f) Please provide any further comments on the likely impact of this change for construction (eg supply chains).

There are a significant number of buildings that contain elements that are not A2 but have passed the BS8414 test and are applied in accordance with BR135. The use of materials that are tested to BS8414 or have demonstrated that they achieve A2 or better should be allowed. This would allow systems to continue to be used and satisfy regulations.

The impact of removing access to the BS8414 or other accredited and audited fire tests would, from INCA's perspective, create a lack of confidence in those people living in the building and a pressure to

re-clad them at considerable expense. The majority of residential, student accommodation and hotel buildings over 18m in height have been built using cladding systems that have elements that are not defined as non-combustible.

The significant shift away from combustible elements has already generated increased costs and supply chain problems with extended lead times for some products. INCA would expect to see significant increases in cost in meeting the proposed new requirements as the replacement elements are more expensive and critically less efficient thermally. Cladding systems will have a significant difference in thickness and therefore cost. INCA members already report large price rises in some non-combustible component parts, and extended lead times. There will be significant shortages and increases in imports to satisfy the increased demand for these products if the proposed ban is introduced.