

FIRE BARRIERS – REQUEST FOR CLARIFICATION

Update on a formal request for clarity on the required locations for non-combustible fire barriers within EWI systems that employ insulation types not classed as non-combustible. Should you require any further clarification please consult with a competent person from the project design team or associated fire safety engineer.

Date of update: 10th June 2024

Following a number of concerns raised by collective memberships and after discussions within the Technical Committee, on the 18th July 2022 INCA, the NIA and SWIGA collaboratively sent a letter to the Department for Levelling Up Housing and Communities (DLUHC) with a request for clarity on the required locations for non-combustible fire barriers within external wall insulation (EWI) systems that employ insulation types that are not classed as non-combustible.

The purpose: “to ensure that all EWI system suppliers and installers of EWI systems in England are working to the same parameters and this in turn will ensure that compliance with the Building Regulations is being achieved.”

By way of summary the contents of the letter highlighted that, whilst BR135 makes a case for considering the use of cavity fire barriers within EWI systems that employ insulation that is not non-combustible, the document does not prescribe where such barrier should be employed.

The letter also pointed out that undertaking an individual fire risk assessment on each property that was under consideration for external wall insulation would add a significant cost to the thermal retrofit of every individual existing dwelling.

The conclusion was that:

“This lack of clarity in relation to the position of fire barriers is therefore unhelpful and we would therefore like to achieve a pragmatic and workable solution to ensure that, in all cases, fire barriers are incorporated into these systems in a consistent manner such that they satisfy the requirements set out in the building Regulations. We would therefore kindly request that you provide Industry with the clarity on the above concerns and, if further discussion on this matter is required, we would welcome the opportunity to engage further with you to achieve a clear set of guidance that the industry, can adopt.”

After a follow up email in September INCA eventually received a response from DLUHC dated 7th November 2022 which explained that Approved Document B was to be updated from 1st Dec 2022 and highlighted one of these amendments:

Clause 10.7 (below) introduces requirements for materials and products used on residential buildings between 11m and 18m to be class A2-s1, d0 or better.

Therefore, in these circumstances, systems using combustible insulation are required to undergo full scale BS8414 testing, and fire barriers would be required as per the design of the test specimen.

DLUHC also informed us of a full technical review of ADB, and that they were conducting research into the classification of external wall systems. As part of this project, they were conducting a review of the BS 8414 test methodology and classification criteria in BR135. The project will examine the use and placement of cavity barriers in the design and construction of buildings and will inform the development of future policy decisions.

This response didn't directly address the issue as the response referred back to the Approved Document B and the sections associated with 'cavity barriers' whereas the query we had was in relation 'fire barriers' which are fundamentally different.

For that reason, INCA responded to that effect by letter on 9th January 2023.

As a result of this response we (INCA, NIA and SWIGA) were collectively given an opportunity to meet with DLUHC and the Building Safety Regulator to discuss further. This Teams meeting took place on 23rd May 2023. A good meeting during which all our concerns were duly heard, understood, and taken away for consideration.

Latest BSR Guidance

After follow up by email in November we eventually received our update from the Building Safety Regulator on 23rd January 2024 as follows:

"I would just like to confirm that your industry's concern has been logged for review as part of our processes of ensuring that the guidance remains robust and clear. The call was very insightful and helpful in understanding the details of the matter, so thank you for pursuing that. The matter is intended to be considered in future reviews of the guidance.

I would also like to bring to your attention that as part of the technical review of Approved Document B, the Government is currently undertaking research as part of a review into both BS 8414 and BR 135. It is expected that the research streams will be relevant to the discussions had on this topic. There is approximately 18 months left of this review programme. A general overview of projects can be found here: Review [technical-review-of-approved-document-b-2022-progress-update](#).

Further to add, I consider it relevant, as discussed in the meeting, that the recommendations of paragraph 10.4 of ADB 2022 Volume 1 should always be considered by Designers".

Paragraph 10.4 of ADB 2022 Volume 1 states:

In relation to buildings of any height or use, consideration should be given to the choice of materials (including their extent and arrangement) used for the external wall, or attachments to the wall (e.g. balconies, etc.), to reduce the risk of fire spread over the wall.

The response continued:

“In the meantime, if your trade association has considered the topic further and has reached any conclusions on possible best practice, then there is an option for that to be shared with CROSS (Collaborative Reporting for Safer Structures UK (CROSS-UK) (cross-safety.org)) to inform the industry and improve clarity in the sector.

I hope the above helps in updating your membership.”

Future Developments and Progress

INCA will keep you informed as to progress of the ongoing review and will provide supportive input into the process as appropriate.