National Federation of ALMOs

championing better homes and communities

NFAs' response to MHCLG's consultation on "Banning the use of combustible materials in the external walls of high-rise residential buildings"

August 2018

Introduction

The National Federation of ALMOs (NFA) is the trade body which represents all housing Arms' Length Management Organisations (ALMOs) across England. The NFA represents 33 ALMOs which manage around 470,000 homes across 36 Local Authority areas.

This consultation response has been prepared by Chloe Fletcher, NFA Policy Director. We do not have any technical building or fire safety knowledge and so have only responded to questions which are relevant to our members as managers of council housing. Should you have any queries or require further information, please don't hesitate to write to chloe.fletcher@almos.org.uk or phone 07526 171033.

The NFA welcomes the Government's consultation on this issue and the desire to make the rules clearer for everyone involved in building new housing or renovating it. The NFA fully supports an outright ban on the use of combustible materials in the external walls of high-rise residential buildings and would also like a ban on other high-rise buildings such as offices as well as complex residential buildings designed to house more vulnerable tenants such as sheltered or extra care blocks and hostels regardless of height.

Questions

Question 3

a. Do you agree that combustible materials in cladding systems should be banned?

Yes

b. Should the ban be implemented through changes to the law?

Yes

c. If no, how else could the ban be achieved?

Question 4

Do you agree that the ban should apply to:

a. to buildings 18m or over in height?

Yes

b. throughout the entire height of the wall, i.e. both below and above 18m?

Yes

c. to high-rise residential buildings only?

No

d. to all high-rise, non-residential buildings e.g. offices and other buildings, as well as residential buildings?

Yes

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

We think that the ban should also apply to complex of buildings under 18m in height, it should therefore should also include a definition that looks at distance to fire escapes, number of units within the whole building and vulnerability of residents or occupants. It should also include high rise buildings for non-residential use such as offices so that employees are not put at risk either given the speed at which the fire at Grenfell Tower took hold and spread throughout the building.

Question 5

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?

Yes, we agree that seems to be the most sensible approach and that A2 should be used.

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

Question 6

Do you agree that a ban should cover the entire wall construction?

Yes

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b. If no, what aspects of the wall should it cover?

c. Should a ban also cover window spandrels, balconies, brise soleil, and similar building elements?

Yes

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

These elements all form part of the building construction and if they burnt during a fire could help spread a fire or cause materials to fall from the building endangering efforts to manage the fire

Question 7

Do you agree that a limited number of wall system components should, by exception, be exempted from the proposed ban?

Don't know

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?

Question 8

Do you agree that:

a. a risk-based approach is appropriate for existing buildings?

We believe that the ban should apply to existing buildings but that a reasonable timescale and funding should be made available to social landlords to remove any combustible cladding from existing buildings with a risk based approach determining the order of priority of work and additional safety measures put in place to protect residents until it has been complete.

b. the ban should apply to alterations to existing buildings, including overcladding?

Yes

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

Yes

d. the ban should not affect projects where building work has already begun?

No

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

The ban should apply to projects where building work has started in order to ensure all residential buildings meet the same safety standards.

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 BS8414 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 BS8414 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 (e.g. supply chains)

We have not provided answers to question 9 as we do not have sufficient information or technical knowledge to comment on behalf of our members.

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