

Questions

Confidential Answers

Respondent Details

Question 1	Respondent details
Name	Dr Ronan Brunton
Position (if applicable)	Technical Manager
Organisation (if applicable)	Single Ply Roofing Association
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Please state whether you are responding on behalf of yourself or the organisation stated above	Response on behalf of SPRA membership.

Question 2	Select one
Please indicate whether you are applying to this consultation as:	
<ul style="list-style-type: none">• Builder / Developer	
<ul style="list-style-type: none">• Designer / Engineer /Surveyor	
<ul style="list-style-type: none">• Local Authority	
<ul style="list-style-type: none">• Building Control Approved Inspector	
<ul style="list-style-type: none">• Architect	
<ul style="list-style-type: none">• Manufacturer	
<ul style="list-style-type: none">• Insurer	
<ul style="list-style-type: none">• Construction professional	
<ul style="list-style-type: none">• Fire and Rescue Authority representative	
<ul style="list-style-type: none">• Property Manager / Housing Association / Landlord	
<ul style="list-style-type: none">• Landlord representative organisation	
<ul style="list-style-type: none">• Building Occupier/ Resident	
<ul style="list-style-type: none">• Tenant representative organisation	
<ul style="list-style-type: none">• Other interested party (please specify)	Trade Association

For relevant questions, the answer is that SPRA does not support the proposed ban. The reasoning behind this is given.

Question 3	
a. Do you agree that combustible materials in cladding systems should be banned?	<ul style="list-style-type: none"> • No. • A performance-based testing approach like the BS8414/BR135 should determine suitability or otherwise for the entire system. The system should be verified as designed and installed correctly.
b. Should the ban be implemented through changes to the law?	<ul style="list-style-type: none"> • No • A ban is not supported by SPRA
c. If no, how else could the ban be achieved?	<ul style="list-style-type: none"> • While a ban is not supported by SPRA any changes deemed necessary should come through Approved Document B

Question 4	
Do you agree that the ban should apply:	
a. to buildings 18m or over in height?	<ul style="list-style-type: none"> • No • A ban is not supported by SPRA • There is ambiguity regarding the height above which any proposed ban should apply. Discussion in 'Building a Safer Future' indicated a 10 storey, height threshold. This is confusing to industry.
b. throughout the entire height of the wall, i.e. both below and above 18m?	<ul style="list-style-type: none"> • No • A ban is not supported by SPRA • If a ban is to be introduced the height above which it would apply should be clarified. It should only apply above this height.
c. to high-rise residential buildings only?	<ul style="list-style-type: none"> • A ban is not supported by SPRA • If a ban is introduced, it should be for refurbishment of high-rise residential only
d. to all high-rise, non-residential buildings e.g. offices and other buildings, as well as residential buildings?	<ul style="list-style-type: none"> • A ban is not supported by SPRA • If a ban is introduced, it should be for refurbishment of high-rise residential only

e. Please provide any further information in relation to your answers above.	The determination of the building height threshold above which any proposed ban would take place requires updated evidence from all interested parties.
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Question 5	Yes/No/Don't Know
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?	<p>Yes, while influence on the relevant EU committees is possible. This may change post-Brexit and further consideration to this point required.</p> <ul style="list-style-type: none"> • Preference would be for a single system test such as BS8414/BR135 to verify compliance
b. If no, what class should be allowed in wall construction and why?	<ul style="list-style-type: none"> • As above Preference would be for a single system test such as BS8414/BR135 to verify compliance

Question 6	Yes/No/Don't Know
a. Do you agree that a ban should cover the entire wall construction?	A ban is not supported by SPRA
b. If no, what aspects of the wall should it cover?	A ban is not supported by SPRA
c. Should a ban also cover window spandrels, balconies, brise soleil, and similar building elements?	Some of these elements may not be suitable for testing to BS 8414. Appropriate testing methodology should be used to ensure compliance for these items.
c. Please provide any further information in relation to your answers above.	[Free text answer]

Question 7	Yes/No/Don't Know
a. Do you agree that a limited number of wall system components should, by exception, be exempted from the proposed ban?	<p>A ban is not supported by SPRA</p> <p>If a ban is introduced, then yes there should be exceptions based on ensuring overall system performance without compromising a system test such as BS8414 to demonstrate overall compliance.</p>

b. If yes, what components should be included on an exemption list and what conditions should be imposed on their use?	<p>A ban is not supported by SPRA</p> <p>Exemptions could be gaskets, seals, air and vapour control layers, waterproof membranes. This is not an exhaustive list without compromise to any relevant compliance testing such as BS8414</p>
c. Would you recommend an alternative way of achieving the policy aims stated above?	<p>A ban is not supported by SPRA</p> <ul style="list-style-type: none"> • System testing to BS8414 / BR135

Question 8	Yes/No/Don't Know
Do you agree that:	
a. a risk-based approach is appropriate for existing buildings?	<ul style="list-style-type: none"> • Yes, a risk-based approach would be an appropriate method to bring existing buildings up to compliance level
b. the ban should apply to alterations to existing buildings, including over-cladding?	<p>A ban is not supported by SPRA</p> <ul style="list-style-type: none"> • Should a ban be imposed than it should apply to alterations to existing buildings
c. the ban should extend to projects that have been notified before the ban takes effect but work has not begun on site?	<p>A ban is not supported by SPRA</p> <ul style="list-style-type: none"> • If a ban is to be imposed, then the effect on the supply chain needs analysis. If a test like BS8414 can prove compliance ban should not apply.
d. the ban should not affect projects where building work has already begun?	<p>A ban is not supported by SPRA</p> <ul style="list-style-type: none"> • If a ban is to be imposed then this could have serious consequences for contractors, supply chain and clients. If a test like BS8414 can prove compliance ban should not apply.
e. Please provide any further information in relation to your answers above.	[Free text answer]

Question 9	Free text answer
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	<ul style="list-style-type: none"> • It is difficult to be specific as such a ban could be very wide reaching affecting many elements of wall construction. Using BS8414 as a means of compliance makes sense

or better requirement (e.g. sheathing boards or vapour barriers)?	and the focus should be on verification of correct installation
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?	<ul style="list-style-type: none"> No data
c. What the impact of removing access to the BS8414 for those buildings affected by the ban test is likely to be?	<ul style="list-style-type: none"> This would clearly have impact on type of materials used potentially increasing structural loading through using thicker, heavier materials. There could be an increase in cost of materials and transport charges Design changes necessary in detailing to comply with energy efficiency due to thicker materials. Limiting design options
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?	No data to hand.
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.)	No data to hand