

14<sup>th</sup> August 2018

Ministry of Housing, Communities and Local Government  
2 SW, Fry Building  
2 Marsham Street  
London  
SW1P 4DF

Dear Sir or Madam

**Re: Banning the use of combustible materials in the external walls of high-rise residential buildings**

We write on behalf of the members of SPRA in response to the government's published open consultation of 18<sup>th</sup> June 2018 in connection with the above proposed ban. This letter is a part of our submission in addition to the completed questionnaire also submitted. We welcome consideration of our membership's view on the matter.

The effect of a proposed ban could have significant impact on SPRA members;

- The potential of a ban on combustible materials spreading to different building types e.g. low rise and non-residential and other building elements, namely flat roofs.
- Many SPRA members being unable to provide 'non-combustible' specifications to meet any new requirement
- Severely limiting choice in material selection to address other issues associated with technical detailing design
- Significant additional cost of flat roof design making alternative roof designs more likely (non-flat)
- Major reduction in number of flat roof installations directly affecting our industry.

There would also be a negative impact on the wider UK construction industry that would ultimately have an effect on the client, public and private, not least of which would be significantly higher building cost and potential difficulties in procurement of suitable products and practical design specifications.

Banning combustible materials in residential high-rise buildings gives rise to other questions concerning the construction industry's performance to date;

- a. Is the current testing and certification regime, which to date also includes combustible materials in a systems approach, adequate in identifying 'at risk' specifications?
- b. Are the tested and certified specifications adhered to on site in the 'as built' environment?
- c. Is there independent monitoring, checking and 'signing off' of 'as built' work from a specification and installation quality standpoint as meeting the requirements of the building type in function?

**Single Ply Roofing Association**

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If the answer to question (a) above is 'yes', then the focus of change should address questions (b) & (c) as that would, in the opinion of SPRA members, have a much greater impact in effecting meaningful change in construction industry culture, necessary to ensure public safety.

SPRA members, by association (product manufacturers, installing contractors and affiliates) have systems in place that meet or exceed 'best practice' in relation to the three questions above.

All SPRA product manufacturer members have had their SPRA registered products tested in a systems approach and certified to current British Standards ensuring clarity of certified system performance in the event of fire spread and penetration. The 'systems approach' often incorporates combustible materials as necessary. These system specifications tested independently to British Standards have been developed over many years and have incurred high cost in capital and time to the manufacturer to ensure they meet the required British Standard.

To ban all combustible products is an ill-logical approach to addressing the issue and on reflection implies that the standards were inherently wrong in the first place. Ensuring that current standards are adhered to and enforced, if necessary, will eventually change industry culture in a similar way that CDM regulations have successfully improved site safety for all.

Despite the considerable amount of fire related product testing undertaken by SPRA members to date this is a continual process and requires future access to testing facilities within a reasonable cost and timeframe window.

There is real concern among SPRA members that if such a ban were to be imposed on external walls that this may eventually extend to flat roofs. There is absolutely no reason why this should be the case as the performance of these different parts of a building structure in respect of fire is also significantly different. Appropriate current testing methodology reflects this. However, the concern would be that such important information on this significant difference becomes overlooked. Specifying a flat roof is very often the chosen design approach in residential buildings above and below 18m for a number of very sound and logical reasons providing very real economic and performance benefits.

It is not a compromise that is suggested by SPRA on this issue. It is a *following through and enforcement of current standards* reflecting the approach suggested by the Hackitt review (May 2018). If products or systems do not meet existing testing standards, then they should not be present in the 'as built' construction. Equally the correct installation of the products and systems should be verified, preferably independently, by a competent person ensuring performance in situ reflecting as tested and certified.

However, it is understood that there is very real concern among the general public regarding their personal safety and the government must address this appropriately. The compromise suggested by SPRA is to ensure that only tested and certified systems are specified and verified as installed correctly to the specific tested criteria, by a competent person.

This ensures that the original final design assuming it has the appropriate certification, results in the 'as built' end product or system correctly installed. The growing emergence and take up of BIM through industry digitalisation should ensure any necessary changes are signed off by

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the design team efficiently. The final design must have the necessary 'signing off' as meeting appropriate standards and regulations.

In summary, in the opinion of SPRA, existing fire testing standards are adequate and may incorporate combustible materials in a systems approach that depends on the relevant and appropriate test methodology. The appropriateness of any test standard or classification to be met should be fair and clearly stated depending on building type and function (high rise residential, hospital, industrial etc).

Yours faithfully,

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Technical Manager

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