



Llywodraeth Cymru  
Welsh Government

**Number: 50772**

Welsh Government

# Summary of responses and the Government Response for amendments to Part B (Fire Safety) of the Building Regulations and associated statutory guidance documents, including a call for evidence

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## 1. Introduction

- 1.1 This report provides a summary of the responses to the consultation published on 17 October 2023 in relation to amendments to Part B (Fire Safety) of the Building Regulations and associated statutory guidance documents, including a call for evidence.
- 1.2 It does not aim to capture in detail every point raised by respondents, though it should be noted that all comments have been duly considered whether they are noted here or not. The Welsh Government has provided a response to each question in the consultation.
- 1.3 The views reported in this summary are those expressed by the respondents to the consultation and do not necessarily reflect those of the Welsh Government.

## 2. Consultation Responses – Overview

- 2.1 There were 51 responses to the consultation. Respondents who completed the consultation response form have been assigned to their organisation. The table below shows the number of responses received from each sector.

Type of Organisation:	Count
• Builder/Developer	0
• Manufacturer	8
• Designer/Engineer/Surveyor	4
• Local Authority Building Control	7
• Approved Inspector Building Control	1
• Trade association	18
• Fire engineer/Fire Authority	3
• Facilities Manager	0
• Retailer	0
• Construction Professional	3
• Property Manager/Landlord	1
• Landlord Representative Organisation	3
• Charity	1
• Campaigner or Lobby Group	0
• Other Interested Party (please specify)	
• Insurance company	2

### 3. Handling of responses

- 3.1 A standard response form was provided for ease of use, however, where respondents did not use the form, representations have been attributed to the most appropriate question.
- 3.2 Where respondents have not answered with the standard responses proposed but have clearly indicated a clear position in their answer, they have been assigned that response in the statistical analysis. For example, where a respondent used the phrase 'I support the proposal' their response was marked as yes. Where a clear response was not identifiable, answers were marked as 'no response' in the statistical analysis with the responses included in the summary of comments.

### 4. Part 1

Question 1.	Yes%	No%	Unsure %	No response
Do you agree that hotels, hostels and boarding houses, as referenced within the definition of room for residential purposes in regulation 2, should now be included within regulation 7(4) of the Building Regulations 2010, and therefore subject to the ban? If no, please provide your reasoning and evidence.	61	8	4	27

The majority of those who responded (61%) were in agreement with proposed expanded scope of regulation 7 (4) to include rooms in hostels, hotels and boarding houses.

The common themes and viewpoints from the respondents who disagreed are as follows:

The building types in question generally have additional levels of safety through management and design requirements, and a blanket ban on materials that are not classed as non-combustible could lead to complacency in design. Comments also relate to rates of fatalities being higher in other purpose groups.

Comments in favour related to lower levels of management than anticipated / considered in design, unfamiliarity with surroundings, and evacuation times / procedures.

#### Government response to Question 1

The majority of those who responded supported our proposals to include hotels, hostels and boarding houses in the requirements of Regulation 7 of the Building Regulations 2010. We will therefore bring hotels, hostels and boarding houses within the scope of the ban, meaning that the external walls of these buildings will need to meet the same performance requirements (A2s1,d0 or better).

Question 2.	Yes%	No%	Unsure %	No response
Should any other building types be included within the scope of the ban? Please provide details and evidence to support your answer.	25	32	10	33

Of those who responded to the question, there was a slight majority in favour (32%) of no further building types being included in the ban.

Comments in favour of further expansion of building types to be included in regulation 7(4) of the Building Regulations 2010 were as follows:

Buildings with high occupancy of people unfamiliar with the building i.e. assembly / complex retail. Any building meeting the height thresholds of the definition of a HRB (regardless of any residential units), a lower threshold of 11m for all buildings, a ban on combustible construction depending on type of occupancy (i.e. vulnerable occupants / schools / entertainment venues).

Concerns around the ability of the industry to manage building risks in occupation phase were raised and therefore further limits on materials would be beneficial.

Further responses reiterated comment relating to non-combustible external wall construction in all school buildings, and concerns around non-residential buildings that only require compartment floors when over 30m (i.e. potentially large compartment sizes with no requirement for cavity barriers etc.).

Further calls for inclusion of care homes and hospitals based on high vulnerability and ability for independent escape, as well as buildings occupied for long periods – i.e. offices.

### Government response to Question 2

Although the comments provided examples of other types of buildings that should be included in the ban, there was no evidence provided to support the claims. Therefore, it is not proposed to include any further building types into the ban at this stage.

## Setting limits on combustible materials on certain buildings 11-18m

Question 3.	Yes%	No%	Unsure %	No response
Do you agree that the amendment to Approved Document B to set limits on certain combustible products should be set for buildings with a storey 11-18m (see Diagram C6 in Appendix C in Approved Document B Vol. 2)? Is there an alternative lower height threshold that should be considered? Please provide evidence.	55	13	8	25

The majority of respondents (55%) were in favour of the proposed amendments, to introduce a lower height threshold for the use of combustible products.

Some of the key points raised by the respondents included:

- A need for further clarity on the proposed scope of ban.
- Considerations of building use including hotels, offices, vulnerable occupants - schools, care homes, entertainment venues.
- Concerns were raised about the suitability of BS 8414 testing to demonstrate compliance, and established concerns with BS 8414 and BR135 remaining unaddressed.
- Recommendations on a lower limit depending on risks within building: mobility / escape strategy (stay put) and combustibility of structure.
- Concerns around suitability of BRE 135 approaches.
- Suggestions of considerations for buildings of any height, and extension of scope beyond that of residential use.
- Concerns were raised regarding confusion, social impacts of further change, and the ability of the product market to adapt.
- Unintended consequences of existing buildings and the impact on insurance and asset value as a result.
- Height should not be the sole factor.
- Comments raised in relation to the term reference “limited combustibility” within the current version of Approved Document B.

**Government response to Question 3**

We will amend the guidance in Approved Document B to set limits on the combustibility of materials used in walls for buildings that include a “residential” purpose (purpose groups 1 and 2) with a storey 11-18m. As part of this approach we will amend regulation 6(1)(c) of the Building Regulations 2010 from 15m to 11m to reduce the height of buildings that must comply with the requirements at B4(1) of Schedule 1 of those Regulations when the whole building undergoes a material change of use.

**Metal Composite Materials**

Question 4.	Yes%	No%	Unsure %	No response
Do you agree that metal composite panels with a polyethylene core should be banned from being used in external wall construction of any building regardless of height or purpose? If no, please provide evidence to support your answer.	49	14	8	29

The majority of those who responded agreed (49%) with the proposal to ban metal composite panels with a polyethylene core being used in external wall construction of all buildings.

The common themes and viewpoints from the respondents who disagreed or were unsure included:

- There is still some use in the commercial arena, a total ban could have further consequences / repercussions for existing stock (insurance etc).
- Common themes throughout the responses were a call for a ban on all combustible products, and not be limited to metal composite panels with polyethylene cores and in particular any with a gross calorific value of more than 35 MJ/kg.
- Whilst a lower risk to low rise buildings, other combustible products may still be installed etc. Concerns around specific product ban whilst potentially allowing similarly combustible products to be installed (and view on calorific value should be considered rather than specific product type).
- Level playing field should be determined, and whole system BS 8414 testing as anything other than this would fall short of Dame Judith Hackitt recommendations. Agreed testing regime should include deemed to satisfy and non-combustible products. All cladding systems tested, risk assessment considerations rather than total ban. Low rise buildings with better means of escape design and such lower risk.
- Some PIR core insulation products performed well in previous tests, however would be banned based on blanket ban.

#### **Government response to Question 4**

There was strong support for this proposal in the consultation response. 49% supported the proposal to ban metal composite panels with a polyethylene core.

The responses highlighted that other combustible materials should also be considered within a total ban, but UK Government research into the fire risk of various cladding materials including the aluminium composite material (“ACM”) with a polyethylene core that was used on Grenfell Tower indicate that products with a polyethylene core are by far the most hazardous cladding materials, of those tested.

We consider that the use of polyethylene core products as cladding materials poses such a significant fire risk that an outright ban of their use on any buildings, regardless of height or purpose, is justified.

In accordance with the proposal, we will introduce a complete ban on the use of metal composite materials with an unmodified polyethylene core in and on external walls of any building regardless of height or use. This ban will prohibit such materials from being used on new buildings and buildings undergoing a refurbishment.

This outright ban will apply to MCM with a polyethylene core, the type of cladding panels used on Grenfell Tower.

<b>Question 5.</b>	<b>Yes%</b>	<b>No%</b>	<b>Unsure %</b>	<b>No response</b>
If their use was to be restricted, do you agree with the proposed definition? Please provide evidence to support your answer.	33	8	24	35

The responses varied, however the majority (33%) of those who responded agreed with the proposed definition.

The common themes and viewpoints from the respondents who disagreed are as follows:

- The thickness criteria of no more than 10mm was considered to potentially allow thicker panels which may contain higher calorific content to be permitted. Broader descriptions rather than explicit reference to polyethylene should be considered to ensure it is not substituted with a similarly high-risk product:

“We do not agree that the definition of metal composite panels should be restricted to panels or sheets having a thickness of ‘no more than 10mm’ - this restriction anomalously and needlessly excludes thicker panels of the same composition with proportionately higher fuel-loads.”

“It is unclear why the definition limits the thickness of the panel to no more than 10mm. Whilst this may be reflective of the typical dimensions of an ACM panel, it would appear to create a potential loophole whereby ACM over 10mm thick with a highly combustible core would still be permitted.”

“Great caution needs to be exerted when defining products to ensure that in doing so there is not scope to bring in other equally poor performing characteristics in their place. Any changes must not lead to unintended consequences that are detrimental in other areas of building performance criteria”

- Respondents considered if the ban should apply regardless of thickness.
- Concerns around the confusion of MCM / HPL systems and products, and that some are able to pass test criteria.
- Other points and comments to note: restriction of use should be explicitly indicated on product information / data / specification sheets.

### **Government response to Question 5**

Those who responded supported the proposed definition of a metal composite material. We will amend the regulations in accordance with the proposed definition.



## Attachments

Question 6.	Yes%	No%	Unsure %	No response
Do you agree that solar shading products need to achieve class A2-s1, d0 or A1? If no, please provide your reasoning and evidence.	55	0	12	33

The majority (55%) of those who responded to this question agreed that solar shading products need to achieve class A2-s1, d0 or A1. None of the responses disagreed.

There were some additional comments provided to the question, such as:

- There is a danger that we lose sight of the problem and simply ban anything that doesn't fit certain parameters.
- Further guidance on whether fixtures and fittings of the solar shading devices are also required to achieve class A2-s1, d0 or A1.
- Clarification on whether solar shading installed on the roof windows, which in turn are positioned on the roof with the pitch of more than 70 degrees, will be required to achieve class A2-s1, d0 or A1 as proposed.
- There may be instances where solar shading products are multifunctional and contain a laminated glass product for instance renewable energy product.

Question 7.	Yes%	No%	Unsure %	No response
Do you agree with the proposed definition of solar shading products? If no, what other definition would you propose and why?	53	2	8	37

The majority (53%) of those who responded to this question agreed with the proposed definition of solar shading products.

The respondent who answered no stated that solar shading is also effective at managing light to provide a visually comfortable indoor space. Consideration should be given to adding this to the definition.

Other respondents also commented in relation to changes to the definition such as:

- Consider 'a device for reducing heat gain within and in the vicinity of a building by deflecting sunlight which is attached to or in the vicinity of an external wall.' This would capture other combustible solar shading products which may have the potential to promote external fire spread onto or into the building.
- Whether the wording would be robust enough to ensure products primarily intended to provide shading for an external area of a building, such as a balcony,

as opposed to “reducing heat gain within the building” would also be covered by this.

Another comment was to highlight that the definition in England is subtly different.

<b>Question 8.</b>	<b>Yes%</b>	<b>No%</b>	<b>Unsure %</b>	<b>No response</b>
Do you agree with our proposal to exempt awnings at ground level? If no, please provide your reasoning and evidence.	37	18	10	35

The majority (37%) of those who responded to this question agreed with our proposal to exempt awnings at ground level.

Of the respondents who answered no, the general reasons given were in relation to still being a risk as could be used a smoking shelter, may have fire loading below such as tables, containers and waste bins that could be subject to vandalism. They can be a risk of vertical fire spread, particularly if they are positioned close to a balcony or openable window above.

Of the respondents who answered yes, some suggested additional conditions for exemption such as they are made from flame retardant material or Class 0.

<b>Question 9.</b>	<b>Yes%</b>	<b>No%</b>	<b>Unsure %</b>	<b>No response</b>
Are there other additional components used as attachments to external walls which should be included within the ban as defined by regulation 2(6)(b)? If yes, what additional components should be included and why?	22	22	17	39

Of the respondents who provided a yes or no answer to this question, half thought there are additional components used as attachments to external walls which should be included within the ban.

Suggestions for additional components included:

- Signage such as advertising signage, advertising items, banners, composite or timber boards, electronic advertising screens.
- External decorative lighting features.
- Green/living walls.
- Canopies should be regarded as a ‘specified attachment’ in a similar manner to balconies.

Some other suggestions were also received in relation to exemptions which were considered in Question 11.

### **Government response to Questions 6,7,8 and 9**

After further consideration we will look to implement additional clarification on the definition of solar shading products included in the consultation proposal.

We will amend the definition from “A device for reducing heat gain within a building by deflecting sunlight which is attached to an external wall” to “A device attached to the external surface of an external wall for reducing heat gain within a building by shading or deflecting sunlight.” This change further clarifies the effect of solar shading products by the inclusion of “deflecting sunlight”. It also matches the definition used in England which will aid consistency in the use of such products.

A response also highlighted the need for clarity on fixtures and fittings for solar shading devices. The requirements of Class A1 or A2-s1,d0 will apply to the curtains and slats of solar shading devices, which ensures that smaller component allowing the operation of dynamic solar shading devices with a non-combustible curtain are not required to meet the performance requirements. This enables the use of more efficient products while not compromising safety and is consistent with the approach taken in England.

The responses also supported our proposals to exempt ground floor awnings. Retractable awnings are often used at ground floor level for shop fronts or similar purposes. There are risks as indicated in some comments, however, it is considered the risk posed by these is limited as they will not extend beyond the ground floor level and the external wall of a relevant building will need to meet the requirements of the ban.

We are grateful for the suggestions for other additional components used as attachments to external walls which could be included within the ban, however, we are not looking to include these additional suggestions to be specifically named at this time.

Although these components are not to be specifically named, all those responsible for building work including building owners, agents, designers, builders and installers, should note that the functional requirements of the Building Regulations 2010 must be met for all building work. Designers should consider the many factors that can influence fire spread when deciding whether the functional requirements will be met by their design.

The responses generally supported our proposals on attachments, and it is still our view that solar shading, made of combustible materials, on the external walls of a building could create a path for fire spread. Therefore, we will look to implement the ban on the use of combustible materials to require that the curtain and or slats of solar shading devices on a relevant building (as defined in regulation 7(4)(a)) of the Building Regulations 2010 achieve class A1 or A2-s1, d0.

## Exemptions

Question 10.	Yes%	No%	Unsure %	No response
Do you agree with the exemption of fibre optic cables from the ban? If no, please provide your reasoning.	47	2	16	35

Of the respondents who provided an answer to this question, the vast majority (47%) agreed with our proposal to exempt fibre optic cables from the ban.

**Question 11**

Which components, if any, do you consider should no longer be included in the list of exemptions in regulation 7(3) and why?

Those who responded, suggested components such as :

- Electrical installations.
- Door frames and window frames, as there are non-combustible options for these.
- Membranes. Non-combustible alternatives are now available.
- Any component for which there is a suitable and readily available non-combustible alternative.
- Cavity trays, there are now options for cavity trays on the market which achieve A1/ A2-s1,d0.
- External wall systems with an external leaf of brickwork or precast concrete that have been subject to relevant large-scale testing and which have cavity barriers at openings and compartment lines.
- Systems meeting the requirements of insurer backed testing will have demonstrated limited fire spread and promotion of fire growth.
- Perimeter upstand insulation to roofs with parapets.
- Seals, gaskets, fixings, sealants and backer rods could be removed from the list. It would also remove ambiguity on whether such items as window EPDM is a seal or a membrane.

Other general comments included disagreement with the ban and list as a prescriptive approach is dangerous, open to interpretation, ineffective, and requires constant review to allow for product developments, innovation, and changes in construction methods.

Another response suggested that somewhere in the guidance there should be a reference that materials or components containing isocyanates are banned similarly to polyethylene cores in external insulation or insulation cladding panels.

**Question 12**

Which additional components, if any, should be included in the list of exemptions in regulation 7(3) and why?

Those who responded, suggested components such as:

- Rainwater disposal goods, weatherboards and soffits.
- Plastic spacers used to hold the reinforcement in the correct location during the casting of concrete facades. These would not contribute to the spread of fire but are technically banned at present. It would be more logical to allow a certain kg/m<sup>2</sup> minor components that do not achieve class A2-s1, d0 or A1.
- The exemption for membranes should be extended to include:

- a. Waterproof layers installed on a flat roof, balcony or specified attachment that become part of an external wall to a level not less than 150mm above the adjacent finished roof system or top horizontal floor layer of a balcony in accordance with BS 6229:2018 Flat roofs with continuously supported flexible waterproof coverings.
  - b. Waterproof layers installed on a flat roof, balcony or specified attachment that become part of an external wall that adjoins a space within a building to which persons have access only for the purpose of carrying out repairs or maintenance (e.g. lift and stair overruns), or an external space (e.g. parapet walls), to a level not less than the guarding height of 1,100mm above the adjacent finished roof system or top horizontal floor layer of a balcony.
- Systems that have met the requirements of BS 8414 in accordance with BR135 should be permitted.

Another response suggested clarification is needed so that laminated glass is included in the list of exemptions when used within non-vision applications in the external wall, specifically in spandrel areas, for example within curtain walling, and also in non-vision infill panels to windows. Non-vision panels can have multifunctional performance – e.g. renewable energy.

### **Government response to Questions 10,11 and 12**

In relation to components that should no longer be exempt, after considering the suggestions, we do not propose to remove any exemptions at this time. It was noted that there are some components where non-combustible alternatives are available, however, we sought evidence-based views and without that the additional risk of fire spread along the external wall was not clear.

With regard to additional components that could be included in the list of exemptions, we also intend to include components associated with a solar shading device, excluding components whose primary function is to provide shade or deflect sunlight such as the awning curtain or slats. This will ensure that the regulations are clear on what provisions are applicable to both the solar shading products and their components.

The vast majority agreed with our proposal to exempt fibre optic cables from the ban, therefore, we will proceed to exempt fibre optic cables and components associated with a solar shading device as mentioned above.

### **Laminated glass**

<b>Question 13.</b>	<b>Yes%</b>	<b>No%</b>	<b>Unsure %</b>	<b>No response</b>
Do you agree that laminated glass in balcony construction should continue to have to achieve A2-s1, d0 classification or A1? Please provide evidence to support your answer where possible and discuss specific materials or products.	33	10	20	37

The majority (33%) of those who responded to this question agreed that laminated glass in balcony construction should continue to have to achieve A2-s1, d0 classification or A1.

The comments included:

- No evidence laminated glazing panels in balcony designs have been the cause of or added to a fire safety issue.
- Consider laminated glass to be a low fire risk particularly in balcony balustrading.
- The use of laminated glass on balcony is far better than the use of alternative glass that maybe A2-s1, d0 or better, but has the significant health and safety risk of shards of glass falling from the balcony if broken.
- Robustness, such as whether alternative glazing such as that on balconies is sufficiently robust to withstand the temperatures experienced in an external conflagration.
- Anomaly in relation to the ban of its use in balcony balustrading but with no control exercised over adjoining windows and doors.
- There are significant safety risks using non-laminated glass on balconies due to both the potential for debris falling from height and the sudden loss of edge protection.

Those who agreed generally considered that laminated glass could present a fire risk.

**Government response to Question 13**

The majority agreed that laminated glass in balcony construction should continue to have to achieve A2-s1, d0 classification or A1, therefore we will continue to require laminated glass to achieve this when used in a balcony. However, we will keep this under review and are monitoring UK Government research on the use of laminated glass in balconies and will consider the evidence to enable an informed decision on whether laminated glass should be exempted or not (any future proposed changes will be subject to a public consultation).

**Roof Components**

Question 14.	Yes%	No%	Unsure %	No response
Do you agree that additional clarification in regulations or Approved Document B, that roofing membranes are not required to achieve A2-s1, d0 classification or higher when used as part of a roof connecting to an external wall is required? If no, please provide an explanation with evidence to support your answer where possible and discuss specific materials or products.	57	4	10	29

Of the respondents who provided an answer to this question, the vast majority agreed that clarification in regulations or Approved Document B, that roofing membranes are

not required to achieve A2-s1, d0 classification or higher when used as part of a roof connecting to an external wall is needed.

Many respondents suggested clarifications are needed, and some suggested improvements to guidance such as the following comments:

- Approved Document B should be reworded to take into consideration *BS 6229:2018 Flat roofs with continuously supported flexible waterproof coverings Code of practice*.
- Consider limiting this exemption to the minimum sufficient to demonstrate compliance with the functional requirements of Part C2 of the Building Regulations, such as by stipulating the maximum height that roofing membranes can be used in an upstand or similar.

However, some responses suggested no clarification is required.

#### **Government response to Question 14**

The majority agreed that additional clarification is required. The design of the junction between an external wall and a roof often requires that membranes used in the roof construction extend into the external wall with the aim of inhibiting the entry of water.

Therefore, we will provide clarification that roofing membranes are not required to achieve A2-s1, d0 classification or higher when used as part of a roof connecting to an external wall in Approved Document B guidance.

### **Materials below ground level**

<b>Question 15.</b>	<b>Yes%</b>	<b>No%</b>	<b>Unsure %</b>	<b>No response</b>
Do you agree with the proposal of expanding the exemption of the use of water proofing and insulation material from below ground level to up to 300mm above ground level? If yes, what other conditions should be imposed on their use if any?	38	12	16	34

Of the respondents who provided an answer to this question, the majority agreed with the proposal of expanding the exemption of the use of water proofing and insulation material from below ground level to up to 300mm above ground level.

Those respondents that disagreed commented:

- There are non-combustible insulation materials that can be used below and up to 300mm above ground level. Furthermore, we are concerned that unnecessary confusion may result from allowing the use of combustible insulation products on the external walls of buildings subject to the ban.
- The product should not be exempt as potential for combustible material. The industry should provide tested non-combustible insulating products that are waterproof as well as insulating.

### Government response to Question 15

Water proofing and insulation materials used in external wall construction below ground level are exempt from the requirements of the ban. This is because these products need to be water resistant and non-combustible materials are not typically water and moisture resistant.

The majority agreed with the proposal of expanding the exemption, we will therefore exempt waterproofing and insulation materials up to 300mm from ground level from the ban.

## Floor Testing

Question 16.	Yes%	No%	Unsure %	No response
Do you agree with the proposed expansion of classifications required for materials used horizontally to include Class A2fl-s1 and Class A1fl? If no, please explain why and provide evidence where possible.	42	10	16	32

The majority of respondents (42%) who responded agreed with the proposed expansion of classifications required for materials used horizontally to include Class A2fl-s1 and Class A1fl. 16% of respondents were unsure and 10% of respondents disagreed to this proposal.

The common themes and viewpoints from respondents who disagreed to this question are as follows:

This question attracted comments on the best method for assessing the fire performance of balcony floors. Amongst the comments made, some expressed a view that they believed that waterproofing membrane in a 'specified attachment' has a more onerous status under AD B than that of membranes in external walls. This means that any normal waterproofing roof membrane product encapsulated in balcony construction cannot comply, as none currently on the market achieve A2-s1, d0 classification. Most of these waterproofing products are only normally tested as a component of a composite roof build up. Some respondents believed that the Broof(t4) test in conjunction with an A1 or A2 -s1, d0 soffit and edges would be an appropriate measure.

A comment also suggested that membranes installed horizontally as waterproof layers on a balcony or specified attachment should be covered by the exemption for 'membranes' listed in regulation 7(3) of the Building Regulations 2010.

It was considered that further research is required to establish the extent of risk from balcony floors and what, if any controls, may be required.

### Government response to Question 16

The A2 and A1 classifications apply to materials tested vertically as a wall. There are alternative classifications Class A2fl-s1 and A1fl that are available for materials tested horizontally as a floor. Several products used for balcony floors are currently only tested



to A2fl-s1 or A1fl classification and as such do not meet the requirements of the ban. The classification A2fl-s1 and A1fl require materials to achieve similarly stringent requirements as Class A2-s1, d0 or A1.

In the consultation we proposed expanding regulations 6(3) and (7)(2) of the Building Regulations 2010 to permit use of materials achieving Class A2fl-s1 and Class A1fl as part of the performance requirement for inclusion in specified attachments when used horizontally.

A large majority of respondents agreed with our proposal (42% agreed and 10% disagreed). We will therefore amend the Building Regulations 2010 as proposed.

## 5. Part 2

### Evacuation alert systems

Question 17.	Yes%	No%	Unsure %	No response
Do you agree with the proposal to require the provision of evacuation alert systems in new blocks of flats 18m or more above ground level? If no, please provide your reasoning and evidence.	53	2	12	33

The majority of respondents (53%) who responded agreed with the provision of evacuation alert systems in new blocks of flats 18m or more above ground level. 12% of respondents were unsure and only 2% of respondents disagreed to this proposal.

Question 18.	Yes%	No%	Unsure %	No response
Do you agree with the height threshold of 18m or more above ground level? If no, please provide alternative height threshold and any evidence.	31	16	14	39

The majority of respondents (31%) agreed with the provision of evacuation alert systems in new blocks of flats 18m or more above ground level. 14% of respondents were unsure and 16% of respondents disagreed to this proposal.

Viewpoints from respondents who disagreed to this question included that the height of 11m should be considered to assist fire crews as any rescues beyond that height will require an aerial appliance.

**Question 19.**

Are there any other types of buildings which should be included? Please provide any evidence.

Some respondents thought that buildings subject to a material change of use to flats should also be included, not only new build and also any building with a sleeping risk that has a “stay put” evacuation strategy.

**Government response to Question 17, 18 and 19**

The majority of those who responded supported the proposals to include evacuation alert systems in new blocks of flats 18m or more above ground level. There was also support for buildings subject to a material change of use to flats with a storey 11m or more above ground level but there was no evidence provided to accompany this request.

We will amend Approved Document B to provide guidance on including evacuation alert systems in new blocks of flats (Purpose Group 1(a)) with a top storey of 18m or more above ground level.

**Secure information boxes**

<b>Question 20.</b>	<b>Yes%</b>	<b>No%</b>	<b>Unsure %</b>	<b>No response</b>
Do you agree with the proposal to introduce a requirement for Secure Information Boxes in all new blocks of flats with a storey 11m or more above ground level? If no, please provide your reasoning.	55	0	10	35

Of the responses 55% agreed with the proposal for secure information boxes, there were no disagreements to the proposal.

<b>Question 21.</b>	<b>Yes%</b>	<b>No%</b>	<b>Unsure %</b>	<b>No response</b>
Do you agree with the height threshold of 11m? If no, please provide alternative height threshold and any evidence.	49	4	12	35

The majority (49%) agreed with the height threshold for secure information boxes. One respondent stated that secure information boxes should be considered upon the design, use, and occupation of the building, and not just the height requirement.

**Question 22**

Are there any other types of buildings which should be included? Please provide any evidence.

Some respondents stated that the requirements for secure information boxes should be extended to buildings that were subject to a material change of use to flats with a storey 11m or more above ground level, not just new build flats. Hotels and hostels were also mentioned.

Responses also included requests for buildings subject to a fire engineering approach to also have secure information boxes.

**Government response to Questions 20,21 and 22**

The majority of those who responded to the consultation supported the proposals to introduce Secure Information Boxes in all new blocks of flats with a storey 11m or more above ground level.

We will amend Approved Document B to include guidance on the provision of secure information boxes in new blocks of flats (Purpose Group 1(a)) with a storey 11m or more above ground level.

**Wayfinding signage**

<b>Question 23.</b>	<b>Yes%</b>	<b>No%</b>	<b>Unsure %</b>	<b>No response</b>
Do you agree with the proposal to introduce wayfinding signage for the fire service in all new blocks of flats (Purpose Group 1(a)) with a storey 11m or more above ground level? If no, please provide your reasoning.	57	2	6	35

The majority, 57%, of those who responded agreed with the proposal, only 2% disagreed.

<b>Question 24.</b>	<b>Yes%</b>	<b>No%</b>	<b>Unsure %</b>	<b>No response</b>
Do you agree with the height threshold of 11m? If no, please provide alternative height threshold and any evidence.	49	8	6	37

The majority, 49%, of those who responded agreed with the proposal, only 8% disagreed. Of those who disagreed, comments requested that the signage should be extended to all buildings and also to complex buildings, not just new blocks of flats with a storey 11m or more above ground level above.

Respondents who agreed stated that the changes would be consistent with guidance in England.

### Question 25

Are there any other types of buildings which should be included? Please provide any evidence.

Other types of building mentioned in the responses that should be included were hotels, any buildings with sleeping risk, but no evidence was provided to support this.

### Government response to Questions 23, 24 and 25

There was strong support in the consultation responses for the proposal to introduce wayfinding signage in all new blocks of flats with a storey 11m or more above ground level.

We will amend Approved Document B to include guidance on wayfinding signage for the Fire and Rescue Services in new blocks of flats with a storey 11m or more above ground level. This includes guidance on floor and flat identification signs. The responses did not provide any evidence for including this signage in buildings below 11m.

Guidance will be provided in the amended Approved Document B on the location, typeface, letter and numeral dimensions, and visibility requirements. The signage should be easily legible and readable in low level lighting or when illuminated with a torch. This provides designers the flexibility to use different systems while ensuring that they meet the functional requirement and provide the expected benefits to firefighters.

## European fire classifications

Question 26.	Yes%	No%	Unsure %	No response
Do you agree that the national classifications for reaction to fire and fire resistance should be removed from the main body Approved Document B? If you disagree, what evidence can you provide which outlines why.	50	20	8	22

The majority, 50%, agreed with the proposal, only 20% disagreed.

Those who agreed stated that this would remove the confusion and would align codes and standards within industry. Of those who disagreed, there was a request to engage with industry in relation to the impact of change.

### **Government response to Question 26**

The majority of those who responded to the consultation supported the proposals to remove the national classifications for reaction to fire and fire resistance from the main body of Approved Document B. The national classification for reaction to fire and fire resistance will be placed in the appendix of Approved Document B.

## **6. Call for evidence**

We were also interested in other areas of Part B where there is a potential need for changes.

### **European fire classifications**

#### **Question 27**

Please outline any concerns you have about the withdrawal of all the references to the BS 476 series of national classifications within Approved Document B (including appendices).

There were mixed views on the removal of all the references to the BS 476 series of national classifications within Approved Document B. The responses ranged from those who thought it was time for the transition to those who thought that the national classifications were more fit for purpose than European tests. Other responses stated that there should be a transition period before any changes are made.

### **Government response to Question 27**

We have found the responses useful and intend to undertake further research. Any further proposals for the removal of all the references to the BS 476 series of national classifications within Approved Document B will be the subject of a public consultation.

## **Second staircases**

#### **Question 28**

Do you consider that Approved Document B should include a maximum threshold for the provision of a single staircase in residential buildings? Please consider when providing your answer:

- (a) What height do you think the threshold should be set?
- (b) What design considerations should be considered in requiring a second staircase? (e.g. appropriate separation between staircases).

Please include any evidence to support your answer.

There was a majority response in favour of the introduction of a maximum threshold for the provision of a single staircase in residential buildings.

Some common themes raised in the call for evidence responses were as follows:

- Suggestions of a specific height threshold varied between 11 – 30m.
- Further design considerations to be considered included smoke control and ventilation measures, lobby protection, building management, mandating mechanical smoke ventilation for buildings over specific heights, geometry and internal arrangements / layouts.
- Considerations relating to forms of construction and differing limits depending on materials and forms of construction, i.e. higher limits for traditional methods.
- In general, there was a positive response towards further staircases due to the further resilience offered, considering people escaping as well as fire service attendance for fighting fire.
- Views expressed also considered that a blanket introduction of a second stair may not be suitable, but the consideration of multiple aspects of design beyond just height as the key factors, with questions around the design of the stair itself – i.e. general access stair / fire-fighting stair design and arrangements.
- Reference was made to international counterparts and limits on vertical extent of single stair buildings.
- A risk-based approach recommended, and depending on the risk assessment, differing thresholds being applied.
- Considerations to an external stair as an alternative.
- Concerns regarding smoke control and its effectiveness above certain heights.
- True independent alternative stairs should be considered – i.e. separate, independent, - with suitable good design, stairs in close proximity may be considered as true alternatives.
- A review of potential unintended consequences suggested.

### **Government response to Question 28**

The responses received were constructive and the majority of those who responded were in favour of the introduction of a maximum threshold for the provision of a single stair in residential buildings. We intend to use this information and undertake further research necessary in the consideration of requirements for stairs in buildings.

Any further proposals will be the subject of a public consultation.

### **Question 29**

We have asked a number of specific questions throughout this paper, if you have any further comments to make regarding any of the proposals, please set them out here.

### Government response to Question 29

There were varied comments relating to fire safety matters. Where relevant these will be taken forward and included in future research work.

## 7. Impact Assessments

Question 30.	Yes%	No%	Unsure %	No response
Do you agree with the cost estimates and the overall Impact Assessment? If no, please explain what you consider appropriate and provide evidence to show why.	22	4	30	43

Of the respondents who provided a yes/no answer to this question, the vast majority agreed with the cost estimates and the overall Impact Assessment.

Of the respondents who answered no, some comments indicated there was no reference to the withdrawal of all the references to the BS 476 series of national classifications within the impact assessment. Another comment suggested the consultation proposals may have gone further and the Impact assessment may have justified this from an economic perspective with further counterfactuals.

We also received comments in relation to the high cost of property damage resulting from fire including data, and if non-combustible materials are used in all external walls, then the following benefits would be realised:

- Reduced chance of significant fire spread.
- Reduced average loss of the building during a fire (lower normal expected loss).
- Reduced chance of total loss of the building during a fire (lower maximum expected loss).

### Government response to Question 30

The Impact Assessment presents a necessarily broad assessment of impacts, based on assumed development costs. Using this basis the impact assessment is an indicative representation of the likely effect of the proposed changes.

The comments in relation to BS 476 are noted, however, currently we are only seeking views (a call for evidence) in relation to possible full removal of BS 476 (the consultation proposal is to move references to the appendix) therefore, as this is not a current proposal we have not included it at this time. An impact assessment will accompany any future public consultation in relation to this.

We also note the comments in relation to extending proposals to other or all buildings from an economic viewpoint. Consideration to extend proposals to other buildings is considered in the questions above. If any proposals are extended, then these will be captured in a final impact assessment.

A final impact assessment would be published alongside the Regulations amending the Building Regulations 2010 and associated guidance.

### **Question 31**

We would like to know your views on the effects that the proposed amendments would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

The majority of respondents did not provide any comments in relation to this question. Where comments were provided, some felt there would be no effects on the Welsh Language, and other comments suggested the approved documents/legislation should be provided in English and Welsh. In addition, there were comments in relation to construction products (e.g. signage and evacuation alert systems) should be available in Welsh.

### **Question 32**

Please also explain how you believe the proposed actions could be formulated or changed so as to have positive effects, or increased positive effects, on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

As in question 31, the majority of respondents did not provide any comments in relation to this question. Where comments were provided these were similar to question 31 above.

### **Government response to Questions 31 and 32**

The Welsh language is a strategic priority for the Welsh Government and its vision is to see the language thrive. To help achieve this the Welsh Language Standards are a set of legally binding requirements which apply to the Welsh Government. All Building Regulations documents are considered against the standards and published accordingly.

## **8. Next Steps**

We will amend the Building Regulations 2010 in accordance with the Government Response to the Consultation.

Approved Document B (Fire safety) Volume 1 and 2 will now be further developed and finalised in line with the Government responses above. Further consideration will be given to the detail required in guidance.