Llywodraeth Cymru
Welsh Government

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Welsh Government
Consultation Document

Amendments to Part B (Fire Safety) of the Building Regulations and associated statutory guidance documents, including a call for evidence

Date of issue: 17 October 2023
Action required: Responses by 09 January 2024

Mae'r ddogfen hon ar gael yn Gymraeg hefyd / This document is also available in Welsh
Rydym yn croesawu gohebiaeth a galwadau ffôn yn Gymraeg / We welcome correspondence and telephone calls in Welsh

Overview

This consultation seeks views on proposals to:

- Amend the ban of the use of combustible materials in and on external walls of buildings, including building types covered, attachments such as blinds, shutters and awnings, list of exemptions, and a proposal to specifically ban the use of metal composite panels in and on the external walls of all buildings
- Setting limits on the use of combustible materials on certain buildings over 11m through Approved Document B
- Introduce Evacuation Alert System (EAS) in accordance with BS 8629 in all new blocks of flats (Purpose group 1(a)) with a floor 18m or more above ground level
- Introduce Secure Information Boxes in all new blocks of flats with a floor of 11m or more above ground level
- Introduce floor identification and flat wayfinding signage within all new blocks of flats with a floor of 11m or more above ground level
- An amendment regarding referencing of BS EN 13501 and BS 476 fire classifications used in Approved Document B (AD B) and amend regulations 6 and 7 of the Building Regulations 2010 to permit the use of materials achieving the class A2fl-s1 or A1fl
- This paper also seeks a call for evidence over the number of stairs in buildings and the removal of all references to the BS 476 fire classifications from AD B

How to respond

You can email your response to the questions in this consultation to: enquiries.brconstruction@gov.wales

If you are responding in writing, please make it clear which consultation and which questions you are responding to:

Combustible cladding and fire safety amendments.

Written responses should be sent to:

Building Regulations, Welsh Government, Cathays Park, Cardiff, CF10 3NQ

When you reply, it would be useful if you confirm whether you are replying as an individual or submitting an official response on behalf of an organisation and include:

- your name
- your position (if applicable)

- the name of organisation (if applicable)
- an address (including post code)
- an email address, and
- a contact telephone number

Further information and related documents	**Large print, Braille and alternative language versions of this document are available on request.**
Contact details	For any enquiries about the consultation please contact the Welsh Government Building Regulations team by emailing: enquiries.brconstruction@gov.wales For further information: Building Regulations Welsh Government Cathays Park, Cardiff, CF10 3NQ Telephone: 0300 062 8144

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In order to show that the consultation was carried out properly, the Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. If you do not want your name or address published, please tell us this in writing when you send your response. We will then redact them before publishing.

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For further details about the information the Welsh Government holds and its use, or if you want to exercise your rights under the GDPR, please see contact details below:

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Welsh Government
Cathays Park
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CF10 3NQ

E mail:
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The contact details for the Information Commissioner's Office are:

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Introduction

1. In 2018 the Welsh Government consulted on banning the use of combustible materials in and on the external walls of specific types of high-rise buildings. Following the consultation, the Building Regulations 2010 ("Building Regulations") were amended to restrict the use of combustible materials in and on external walls and specified attachments to a list of materials essential for construction but without an available non-combustible alternative.

2. This consultation includes proposed changes to the Building Regulations and Approved Documents B ("AD B"), and consists of two parts:

3. **Part 1**
    - Changing the building types covered by the ban
    - Setting limits on the use of combustible materials on certain buildings 11-18m (see Diagram C6, Appendix C in Approved Document B Vol. 2) through changes to Approved Document B and banning the use of metal composite materials with a polyethylene core
    - Including solar shading products within the ban
    - Amending the exemptions to the ban
    - Changing the performance requirements of the ban

4. **Part 2**
    - Introducing Evacuation Alert System ("EAS") to be provided in accordance with BS 8629 in new blocks of flats (Purpose group 1(a)) with a top storey over 18m or more above ground level
    - Introducing Secure Information Boxes in all new blocks of flats (Purpose Group 1(a)) with a top storey more than 11 metres above ground level
    - Introducing floor identification and flat wayfinding signage within new blocks of flats (Purpose Group 1 (a)) with storeys over 11m or more above ground level
    - Amendment to the BS EN 13501 and BS 476 classifications used in the Building Regulations and/or AD B (Fire safety)

5. The consultation also includes a call for evidence on:
    - The number of stairs in high rise buildings
    - The removal of references to BS 476 classifications used in AD B (Fire Safety)

Background

6. The Building Regulations require that external walls of buildings adequately resist the spread of fire over the walls and from one building to another (Paragraph B4 of Schedule 1) with statutory guidance provided in AD B (Fire Safety) Volumes 1 and 2.

7. Following the consultation in 2018 changes were made to the Building Regulations (**via (SI 2019/1499**) and AD B which came into force on 13 January 2020. The SI amended the Building Regulations and restricted the use of materials in an external wall and specified attachments to those achieving Class A2-s1, d0 or Class A1 in

accordance with BS EN 13501-1:2018. The priority was to improve public safety and to make the route to compliance with the Building Regulations clearer.

8. The ban applies to building work, as defined in Regulation 3 of the Building Regulations including erection of new buildings and material changes of use, on buildings with a storey of 18 metres or more above ground level that contains one or more dwellings, is an institution, or a room for residential purposes (excluding hostels, hotels, or a boarding house).

Part 1

Combustible cladding ban proposals

9. This consultation seeks views and supporting evidence on the proposals below, with more detail and reasoning for each proposal set out in the referenced sections.

    - Change the building types covered by the scope of the ban
    - Banning combustible materials on the cladding and insulation of buildings 11-18m through changes to Approved Document B
    - Metal composite materials
    - Attachments
    - Exemptions
    - Changing the performance requirements of the ban

Buildings in scope of the ban

10. Currently the ban applies to restrict the use of materials in an external wall and specified attachments to achieve Class A2-s1, d0 or Class A1 in accordance with BS EN 13501-1:2018. It applies to the full height of external walls of buildings with a floor 18 metres or more above ground level and that contain one or more dwellings, is an institution, or a room for residential purposes, and includes flats, student accommodation and care homes, but excludes hostels, hotels, and boarding houses.

11. Other buildings not within the scope of the ban (for example office buildings) were exempt as usually they have a lower fire safety risk due to their reduced occupancy overnight (i.e. no sleeping risk) and are provided with different fire safety provisions to meet the functional requirements of the Building Regulations than those within the scope of the ban.

Changing the building types

12. The functional requirement in Part B4 of Schedule 1 to the Building Regulations currently applies to all buildings which are subject to the Building Regulations, irrespective of the requirements of the ban. Therefore, designers must ensure that the building adequately resists fire spread over the external walls.

13. Given the different risks in other building types and improved guidance, in our opinion there is a need to change the scope of the ban to cover all additional building types. The main risk is present when people are sleeping on a site,

therefore our proposal is to expand the ban to cover other buildings that have a sleeping risk.

14. Hotels and hostels have traditionally been staffed overnight and have a holistic approach to the internal means of escape arrangements, these can include management arrangements, multiple routes of escape, escape signage, emergency lighting to assist evacuation, and higher levels of fire detection and alarm systems in comparison to residential buildings. They are also subject to regulation by Fire and Rescue Services under the Regulatory Reform (Fire Safety) Order.

15. We do however note a move away from overnight staffing and physical checking-in arrangements in some of the newer hotels with potential implications for sleeping risk as residents are generally less familiar with their surroundings than in their own residences.

16. We therefore invite evidence based views on the benefits or otherwise of including hotels, hostels and boarding houses within the scope of regulation 7 (4), banning the use of combustible materials on the exterior walls and specified attachments.

Question 1

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.

Question 2

Should any other building types be included within the scope of the ban? Please provide details and evidence to support your answer.

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

17. When considering buildings with a residential use between 11-18m, they may be subject to differing levels of fire risk to those 18m and above. However, while there is some evidence, there is no robust scientific evidence that we are aware of to fully support this. We consider amendments are still needed to increase the safety of users on these buildings.

<u>Reducing the height threshold via amendments to AD B</u>

18. We are aware stakeholders considered the ban on buildings 18m and above as a “blunt instrument” that does not allow designers etc. to consider the risk of individual buildings. The ban applies to the full wall rather than just particular elements (e.g. cladding) which can cause unintended difficulties to industry in designing walls (e.g. including low-risk plastic components) and sourcing materials.

19. The proposal is to retain the ban on buildings with a storey of 18m or more above ground level where regulation 7(2) applies and amend the AD B to introduce new

statutory guidance for buildings with a storey 11-18m (see Diagram C6, Appendix C in AD B Vol. 2), setting guideline limits on the combustibility of materials used in the wall. The intention of which would be to discourage the inappropriate use of combustible materials in these buildings. The level of risk in buildings is relative to their height, and our approach is a proportionate response where the constraints on designers and developers increase with the height of a building.

20. Our proposals are that in buildings that include a 'residential' purpose (purpose groups 1 and 2) with a storey 11-18m (see Diagram C6, Appendix C in AD B Vol. 2) any insulation product, filler material (such as the core materials of metal composite panels, sandwich panels and window spandrel panels but not including gaskets, sealants and similar) etc. used in the construction of an external wall should be class A2-s1, d0 or better. This restriction does not apply to masonry cavity wall construction which complies with Diagram 34 of Section 10 of AD B. Where regulation 7(2) applies, that regulation prevails over all the provisions in this paragraph. By focusing only on the insulation product and cladding we are focusing on the most critical components of the wall and providing a key step change over the current position.

21. As part of this approach we would also reduce the height of buildings that must comply with the requirements at B4(1) of Schedule 1 to the Building Regulations, when the whole building undergoes a material change of use in accordance with regulation 6(1)(c), from 15m to 11m. The approach will enable designers and developers to apply their professional judgement to a degree, while still setting clear expectations.

Question 3

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.

Question 3a

Is there an alternative height threshold that should be considered? Please provide evidence.

Metal Composite Materials

22. 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.

23. We consider that the use of polyethylene-cored 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.

24. In New South Wales, Australia, the use of ACM cladding (with a core comprised of 30% or more polyethylene by mass) has been banned (effective 15 August 2018) in

various building types. However, there are exceptions if the product is deemed non-combustible in accordance with Australian Standard 1530.1 or the proposed external wall construction can pass a test for external wall fire spread and building to building fire spread in accordance with Australian Standard 5113 (which determines performance criteria for a product tested to BS 8414 or ISO 13785-2).

25. Our proposed definition of materials to be banned is:

    "any panel or sheet, having a thickness of no more than 10mm, which is comprised of a number of layers two or more of which are made of metal, alloy or metal compound; and one or more of which is substantial and is made of a material having a gross calorific value of more than 35 MJ/kg when tested in accordance with BS EN ISO 1716.
    A substantial layer is one which is at least 1mm thick or has a mass per unit area of at least 1kg per m^2;"

26. We are asking for evidence-based views on this.

Question 4

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.

Question 5

If their use was to be restricted, do you agree with the proposed definition? Please provide evidence to support your answer.

Attachments

27. The ban of combustible materials includes certain specified attachments to the external wall. These are required to meet the performance requirements of regulation 6(3) and 7(2). The current specified attachments are listed in regulation 2(6)(b):

    a) "a balcony attached to an external wall"
    b) "a solar panel attached to an external wall"

28. We are asking for evidence-based views on whether there are additional components used as attachments to external walls that should be included within the ban to meet the policy aims of reducing the risk to life from external fire spread in buildings covered by the ban.

29. Solar shading products such as blinds, shutters, awnings, brise soleil, and similar products were considered at the time of the original ban but were not included. We recognise the importance of reducing overheating in residences and other buildings, and the contribution of solar shading products to this.

30. It is our view that solar shading, made of combustible materials, on the external walls of a building could create a path for fire spread. Non-combustible sun shading

products are currently available on the market although these tend to be non-retractable and not made from flexible materials. Therefore, the clearest way to ensure safety is to apply the requirements of the ban on the use of combustible materials to solar shading products attached to the external walls of relevant buildings (as defined in regulation 7(4)).

31. Our proposed definition for solar shading products is "*a device for reducing heat gain within a building by deflecting sunlight which is attached to an external wall*."

32. We recognise that retractable awnings may provide benefits for commercial premises at ground level of mixed-use buildings. With this in mind, we are asking for views on exempting awnings, particularly retractable awnings over shops at ground level. We welcome views on what restrictions if any could be placed on the use of these products.

Question 6

Do you agree that solar shading products need to achieve class A2-s1, d0 or A1? If no, please provide your reasoning and evidence.

Question 7

Do you agree with the proposed definition of solar shading products? If no, what other definition would you propose and why?

Question 8

Do you agree with our proposal to exempt awnings at ground level? If no, please provide your reasoning and evidence.

Question 9

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?

Exemptions

33. The in-effect ban of combustible materials includes all elements of wall construction from the outer to the inner faces as well as specified attachments. The list of exempted components in regulation 7(3) is intentionally narrow, with the objective of limiting as far as possible the use of combustible materials in external walls and specified attachments in order to minimise the contribution of the external wall construction to fire spread. The current list of exemptions as per regulation 7(3) is as follows:

- membranes
- any part of a roof
- window frames and glass
- door frames and doors
- thermal break materials
- cavity trays when used between two leaves of masonry
- seals, gaskets, fixings, sealants and backer rods
- intumescent and fire stopping materials
- insulation and water proofing materials used below ground level; and
- electrical installations

34. We consider that the above list of exemptions should be:

    (a) amended to remove components for which alternative non-combustible products become available; and
    (b) amended to include components not already on the list, but which are identified as essential for external wall construction and the ban of the use of which is creating significant issues for building projects in terms of cost and sequencing

35. The ban currently exempts electrical installations within the external wall construction such as wiring cables and sockets. However, this does not extend to fibre optics cable as these wires do not carry current. It is relatively common for fibre optic and similar cables to be routed through the external walls of buildings when retrofitting fibre optic cables. We therefore propose to exempt fibre optic cables alongside electrical installations.

36. We are also seeking input through this consultation on whether there are any other components that could be removed or added to the exemption list.

37. The review undertaken in England[1] highlighted that only 26.5% of those industry stakeholders surveyed in summer 2019 believed some exemptions should be withdrawn. Industry engagement also highlighted several non-exempt components of an external wall that were thought by stakeholders to contribute minimally to the spread of any potential fire and the ban on their use had created a significant burden on industry. The survey of industry stakeholders reported that 79.5% of respondents believe alternative products are hard to find with 52.9% reporting that the ban was impacting delivery times of new projects.

38. We are aware of industry issues with products currently subject to the ban such as boiler flues that have a plastic inner lining, and concerns with the use of paint on masonry walls which is often applied on site making the thickness of paint applied difficult to control. We are seeking evidence-based views on issues such as these.

39. The aim of the ban on combustible materials was to provide clarity to designers by removing the flexibility available to the construction industry. This was done to reduce potential risk to life from fire in new buildings covered by the ban.

[1] Survey of the views of industry stakeholders (publishing.service.gov.uk)

Question 10

Do you agree with the exemption of fibre optic cables from the ban? If no, please provide your reasoning.

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?

Question 12

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

Laminated glass

40. Laminated glass is made from two layers of glass with an organic vinyl interlayer up to 3mm thick used to bind the glass layers together. Glass (including laminated glass) is currently exempt from regulations 6(3) and 7(2) but only when included within a window frame. For aesthetic reasons laminated glass is often used in the construction of balconies.

41. England's review highlighted that there is currently no laminated glass available for external use to achieve the appropriate classification (class A1 or A2-s1, d0) because of the interlayer.

42. There is currently limited scientific evidence to determine the risk posed by the use of laminated glass in balconies. To this end, we propose to gather evidence on the fire risk of glass balustrades before considering whether to exempt laminated glass in balconies.

Question 13

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.

Roof Components

43. 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.

44. Membranes used as part of an external wall are exempted components listed in regulation 7(3). AD B recommends that membranes used as part of the external wall construction achieve a B-s3, d0 classification.

45. Roofs pitched at an angle of less than 70 degrees to the horizontal are not included in the definition of an external wall (see regulation 2(6)(a)(iv)). Roofs pitched at an angle of more than 70 degrees to the horizontal are only part of the external wall where that part of the roof adjoins a space to which people have access (except where access is only for carrying out repairs and/or maintenance). Roof parts (unless included within regulation 2(6)(iv)) are also listed exemptions in regulation 7(3)(b) where connected to an external wall.

46. There appears to be some uncertainty around the continuation of membranes used in a roof system when it is continued to the external wall. We would welcome views on whether additional clarification in the Building Regulations or AD B is required for these components and similar.

Question 14

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.

Materials below ground level

47. Water proofing and insulation materials used in external wall construction below ground level are exempt from the requirements of regulation 6(3) and 7(2). This is because these products also need to be water resistant. The UK Government review raised a practical issue where there is a need for these materials to be continued above ground to prevent moisture penetrating the external walls, which could lead to issues with water ingress and damp.

48. We are asking for views on amending the current exemption in regulation 7(3)(e) for water proofing materials and insulation to include material used below and up to 300mm above ground level, which is thought to be in-line with typical requirements. This would likely have no impact on the fire risk and avoid other issues for people within their homes.

Question 15

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?

Floor Testing

49. 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 regulation 6(3) and 7(2).

50. The classification A2fl-s1 and A1fl require materials to achieve similar stringent requirements as Class A2-s1, d0 or A1. Class A2fl-s1 and A1fl materials need to achieve similar performance when tested in the tube furnace (BS EN ISO 1182) or bomb calorimeter tests (BS EN ISO 1716). However, materials achieving these classifications also need to be tested in a horizontal position (BS EN ISO 9239-1) rather than vertically (BS EN 13823).

51. We propose expanding regulations 6(3) and 7(2) to permit the use of materials achieving the Class A2fl-s1 or A1fl as part of the performance requirement for inclusion in specified attachments when used horizontally.

Question 16

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.

Part 2

52. There are additional proposals relating to fire safety that we propose to introduce alongside these changes. These are set out below.

Evacuation alert systems

53. The Grenfell Tower Inquiry recommended[2] "That all high-rise residential buildings be equipped with facilities for use by the fire and rescue services enabling them to send an evacuation signal to the whole or a selected part of the building by means of sounders or similar devices."

54. A British Standard (BS 8629) was introduced in October 2019, to provide a code of practice for the design, installation, commissioning and maintenance of Evacuation Alert Systems (EAS) for use by fire and rescue services in buildings containing flats.

55. The intended effects of the recommendation and BS 8629 are to ensure that firefighters have an optional means for alerting residents of the need to evacuate as part of a phased and controlled plan in the event of a serious fire and that the person in charge of the in-scope building has included the EAS in their emergency evacuation plan.

56. Our proposal is to amend the technical guidance in AD B Ito require the provision of evacuation alert systems in new blocks of flats (Purpose group 1(a)) with a top storey of 18 or more above ground level. Our proposals will not apply to existing buildings.

[2] Phase 1 Report (October 2019) Volume 4 page 777 Section IV Subsection 12 Para 33.22d

Question 17

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.

Question 18

Do you agree with the height threshold of 18m or more above ground level? If no, please provide alternative height threshold and any evidence.

Question 19

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

Secure information boxes

57. The Grenfell Tower Inquiry Phase 1 report recommended the provision of secure information boxes for new blocks of flats (Purpose Group 1(a)), with a storey 11m or more above ground level. A secure information box provides a secure facility to store information about a building for use by the fire service during an incident. Availability of information can assist the fire service in deciding the correct fire fighting strategy at the earliest opportunity, particularly for buildings with large, complex or uncommon layouts.

58. We propose to amend the technical guidance in AD B to include a provision to require Secure Information Boxes in all new blocks of flats with a storey 11m or more above ground level. The box should be sized to accommodate all necessary information, be easily located and identified by firefighters, be secure to resist unauthorised access (but readily accessible by firefighters) and protected from the weather. We also propose to reference Sections 2 to 4 of '*the Code of Practice for the Provision of Premises Information Boxes in Residential Buildings'* published by the Fire Industry Association (FIA) in AD B as further best practice guidance.

Question 20

Do you agree with the proposal to introduce a requirement for Secure Information Boxes in all new blocks of flats with a storey **11**m or more above ground level? If no, please provide your reasoning.

Question 21

Do you agree with the height threshold of **11m**? If no, please provide alternative height threshold and any evidence.

Question 22

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

Wayfinding signage

59. The Grenfell Tower Inquiry Phase 1 report noted that in the building, stairwell landings were not clearly marked with the relevant floor number and so fire-fighters were unable to easily identify floors when carrying out their duties. The Inquiry recommended (Recommendation 33.27) that in all high-rise buildings "floor numbers be clearly marked on each landing within the stairways and in a prominent place in all lobbies in such a way as to be visible both in normal conditions and in low lighting or smoky conditions.[3]"

60. There is a need to improve the consistency of approach in providing wayfinding signage by making small but meaningful changes to AD B. On this basis, Floor identification signs should be provided on every landing of a protected stairway and every protected corridor/lobby into which a firefighting lift opens. Flat indicator signs to identify flat numbers should also be used and supplemented by arrows where necessary.

61. The options we have identified range from simple, large, painted on numbers through to photo luminescent numbering that would be visible even where smoke has entered the stairwells. We believe that these could be provided at relatively low cost but would be an important contribution to building safety. BS 9991 already recommends that signage numerically indicating the floor level should be provided. There is however no prescribed format (size and design) for the signage to be provided.

62. We therefore propose to amend the AD B to provide wayfinding signage for the fire service should be provided in all new blocks of flats (Purpose Group 1(a)) with a storey 11m or more above ground level.

Question 23

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 **11**m or more above ground level? If no, please provide your reasoning.

Question 24

Do you agree with the height threshold of **11**m? If no, please provide alternative height threshold and any evidence.

Question 25

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

[3] Pg. 778 HC 49-IV – The Grenfell Tower Inquiry: Phase 1 Report - Volume 4 of 4 ↩

European fire classifications

63. Much of the guidance in AD B in terms of performance classifications refers to British Standards or British versions of European Standards. Since the early 2000s there has been a dual approach to performance classification for reaction to fire and fire resistance of construction products. The use of the British Standards version of the European Classification has removed the need for the national classification to remain in use.

64. Running the dual system enabled a transition to take place and the British Standard would be replaced by the more robust and up to date international standard, but the transition was never finalised. On the expectation that the national classification system would be withdrawn, the BS 476 series standards have not been reviewed by the British Standards Institution in detail for some time (over 20 years on average). Recent changes to AD B have also emphasised the use of the BS EN 13501 series of tests over the use of national classes (BS 476).

65. During the Grenfell Tower Inquiry, the use of the national classification standards for reaction to fire and fire resistance in AD B came under scrutiny, and potential flaws in its use were identified.

66. As a first stage in this consultation, we are proposing to remove reference to the national classifications from the main body of AD B but leave their inclusion within the appendices.

Question 26

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.

Call for evidence

67. We are also interested in other areas of Part B where there is a potential need for changes. These areas are the use of fire classifications and single staircases. When considering these areas, please consider:

    - What issues need to be resolved?
    - Why should they be reviewed?
    - What evidence already exists?
    - What are the potential impacts (positive and negative) of change?
    - Please provide any evidence you or your organisation have to support your suggestion.

European fire classifications

68. Within this consultation we have proposed to remove all of the references to the BS 476 national classifications from the main body of AD B and retain them within the appendices. In preparation for further proposals to amend AD B we are also seeking a call for evidence on the removal of all references to the BS 476 series of national classifications within AD B.

69. We are interested in the potential impact for industry, identifying the key products /sectors that would be most impacted by such a change. We understand, based on analysis by the UK Government, that most businesses currently have their products tested to the international standard, and only a small subset of the market still use the BS 476 classification.

Question 27

Please outline any concerns (as suggested in **paragraph 65 above**) you have about the withdrawal of all the references to the BS 476 series of national classifications within Approved Document B (including appendices).

Second staircases

70. Currently, for blocks of flats, AD B does not set a threshold above which more than one staircase must be considered.

71. We are concerned that some tall residential buildings are being designed with a single staircase without due consideration by the designers on the level of safety provided and the necessary resilience. Staircases provide an essential means of escape for residents in the event of an emergency and provide the emergency services with a point of access to all floors of the building. It is our view that the provisions of a second staircase can provide some benefits for very tall residential buildings such as added resilience for extreme events and reduced conflicts between emergency responders entering a building and those trying to escape, reducing the risk of the smoke ingress into an “escape” stairwell. In addition, the provision of a second staircase, residents will have an alternative means of escape in the event one route became filled with smoke.

72. As a new area there is a need to review the evidence base and more fully understand the risks. Concerns have been raised, for example, that the provision of a second staircase could make developments unviable due to a reduction of saleable floor space and increase costs. There are also concerns that not all second staircases provide the same level of benefit to warrant their inclusion.

73. We are therefore seeking a call for evidence on the need for a second staircase above a certain height. We are interested in the benefits this would provide, specific design considerations (e.g. sufficient distance and fire resisting separation between entry points to independent staircases) as well as the potential negative effects upon design and cost of buildings.

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.

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.

Impact Assessments

74. The separate report sets out the results of a cost benefit analysis of the Welsh Government's proposals. We are interested in your views of the identified impacts.

Question 30

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.

75. We are also interested in your views on the impact the proposals may have on the Welsh language.

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?

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.

Next Steps

76. This consultation will close on 09 January 2024. Responses to this consultation will be analysed and a Welsh Government Response will follow.