

The UK timber industry (represented by the Confederation of Timber Industries) shares the Government's commitment to taking action to improve building safety and ensure that the tragedy of Grenfell Tower is not repeated.

**Our members support the overall approach of the Hackitt Review regarding use of materials and guidance in construction. We believe there may be benefits to going further than these recommendations currently suggest, but that this needs to be balanced against implementing a ban which could have unforeseen consequences for homeowners and the construction industry.**

## What action should the Government take?

In order to improve the safety of buildings, the Government must ensure that any new regime is both enforceable and enforced. Arguably one of the challenges to date has been lack of adherence to and enforcement of, existing building regulations and guidance. There has also been some confusion and a lack of clarity in the existing regulatory framework. Unless there is a cultural shift, any changes to the regulatory framework will not have the intended effect of making buildings safer.

As the London Fire Brigade said in its response to the Government's consultation on banning combustible materials: "a ban requires careful consideration to ensure there are not unintended consequences."<sup>1</sup>

**We therefore believe that a licensing system for use of materials – rather than an outright ban – is likely to be a more effective means of ensuring buildings are as safe as possible.**

### Buildings over 18 metres high

**We support a ban on cladding on buildings over 18 metres high.**

For buildings over 18 metres (six storeys) high all cladding systems should be constructed of materials classed as either:

- Euroclass A1 to EN13501-1 (non-combustible)
- Euroclass A2 to EN13501-1 (limited combustibility) or
- The whole system should be compliant with the test regime set out in BS8414.

*No evidence has been supplied that the BS8414 approach is not satisfactory. Quite the opposite: the expert panel continue to confirm their confidence of it. Objective, appropriate and quantifiable test methods are the optimum way forward whilst allowing for change and innovation.*

### Buildings under 18 metres high

**A more nuanced approach should be adopted for buildings under 18 metres high.**

We do not believe that banning (cladding materials below class A2) now or in the future, on buildings of this height, is an appropriate measure, due to the lower risk and differing fire risk management strategies in such buildings, including simpler evacuation principles.

Euroclass B and better materials have been acceptable for low rise cladding applications for many years as one compliance option under Building Regulations and there has been much investment in designing, testing and installing such systems.

There is a need for a wider choice of fascia materials at ground level, so as to provide a more varied living environment. These lower floors are also easily accessible for inspection, maintenance and access by emergency services if required.

<sup>1</sup> London Fire Brigade, *Banning the use of combustible materials in the external walls of high-rise residential buildings: a consultation paper* (14 August 2018) <https://www.london-fire.gov.uk/media/3166/london-fire-brigade-response-mhclg-combustible-cladding-ban-consultation-august-2018.pdf>.

## Extent of the ban

We support changes to limit the use of (and in some cases ban) combustible materials in taller buildings as outlined above. However, the Government has not been clear regarding whether or not it intends any changes to apply simply to cladding, or to the structural wall in its entirety. If the scope of the ban were to include the structural wall as well as the cladding wall, then the impact will be a massive limitation in access to the materials available for building and the stifling of innovation, investment and employment.

Crucially, there is no evidence that the structural wall poses the same fire risk as the cladding wall, and so there is no justification for treating the two in the same way.

If the scope of the ban were to include the structural wall as well as the cladding wall then for the emerging engineered timber industry, the impact of proceeding as proposed would be likely to severely curb the adoption of the technology with impacts in the following areas:

- **Clean growth** - this form of timber construction makes a considerable contribution towards reducing emissions in the construction industry. Reducing or eliminating its use would set back achieving carbon reduction targets.
- **Housing** - Engineered Timber makes a significant contribution to expediting the delivery of new homes and any restrictions on its use could harm housing developments.
- **Innovation** - the UK leads the world in the adoption and development of Engineered Timber design and construction and is exerting the knowledge and experience overseas, which would be lost if the use was curtailed.
- **Industrial/economic investment** - there is huge investment in equipment and business to meet the growing demand and use of Engineered Timber.
- **Forestry** - the economic value of forestry as an alternative to agriculture post-CAP, is enhanced by the substantial long term market generated by demand for engineered timber. The loss of this market could severely devalue the attempts to grow new forests and the forestry sector, with a consequential loss of employment opportunities.
- **Skills** - the use of Engineered Timber requires substantially fewer personnel to construct buildings. With the current workforce crisis in the construction sector, any reduction in the use would have a disproportionate effect on construction capacity.

**A licensing system for materials would balance the need for a safer approach to construction in a proportionate way against practical considerations for the construction industry.**

## About the Confederation of Timber Industries

The Confederation of Timber Industries is an umbrella organisation representing the UK's timber supply chain from forest to end of life recycling. The CTI represents Importers, Producers, Manufacturers, Distributors and Merchants of timber across the UK.

Our Membership includes all of the major trade bodies in the UK: The Timber Trade Federation, The British Woodworking Federation, The Structural Timber Association, The Wood Protection Association, and many other stakeholder groups.

Timber forms a £10 billion value chain in the UK and contributes substantially to the Construction, Manufacturing and Service Industries, providing jobs across the skills spectrum.