Save Safe Structural Timber
Consultation Response Guide

This guide has been prepared to summarise the responses suggested by ACAN to help with submitting personalised individual responses. This is essential in order to have the greatest impact. Please refer to the ACAN response for useful information and sources.

The questions seen as relevant to the campaign are 3a, 3b, 4a, 4b, 4c, 7a, 7b, 14a and 14b. If answered, we think these provide the best opportunities to raise our key concerns.

The deadline for consultation responses is the **13th April.**

Consultation document:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/859300/Combustible_Ban_ConDoc.pdf

Consultation survey:
https://www.surveymonkey.co.uk/r/CombustibleBan

3a Do you agree that hotels, hostels and boarding houses should be included in the definition of relevant buildings in Regulation 7(4)?

YES/NO/DON'T KNOW

- Different building types have different associated risks.
- For all building types, risks should be identified and addressed with the guidance of independent, professionally trained fire risk assessors.
- Balance may be required between risk-based analysis and compliance.

3b Should any other building types be included within the scope of the ban?

YES/NO/DON'T KNOW

- When considering extension of the ban, a balance is needed between regulations that ask for clear compliance and proven risk reduction through independent assessment of the buildings in question.

4a Do you agree that the height threshold of the ban should be reduced to at least 11m and above?

YES/NO/DON'T KNOW

4b Is there another lower height threshold that should be considered? Please provide evidence.

YES/NO/DON'T KNOW

- All projects should have a holistic fire strategy considering height among other factors.
- An engineering approach to each project is preferable to a prescriptive ban.
- Regulations should clearly differentiate between cladding and primary structure.
- This would be similar to Building Regulations in place in Scotland and as recommended by the RIBA, furthering UK regulatory alignment.
- Regulations should mandate a fire safety engineered strategy to demonstrate adequate fire protection of primary structural in external walls.
- More research should be done into fire safe buildings with timber structures taller than 11 meters.

4c Do you agree that an appropriate research project regarding building risk should be carried out to inform further review of the scope of the ban?

YES

NB: WE HAVE ELECTED NOT TO RESPOND TO QUESTIONS 5 TO 6

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

- An exemption list ought to be informed principally on the basis of a robust methodology (e.g. BS8414) testing full-wall assemblies.

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

- Primary structure with adequate fire protection, including structural timber, when tested to BS8414 using full-scale systems, should be exempt from the ban.
- This gives designers similar abilities to those in the US and Canada for demonstrating a design's fire performance.
- The current ban would diminish research and innovation into structural timber.
- The increased use of structural timber is pivotal in efforts to mitigate climate change.

14a Please provide any additional evidence on costs, risks and benefits which should be considered in an assessment of impacts of this consultation.

- Banning all combustible materials in the structural wall could compromise our ability to reach net zero targets.

- Therefore primary structures with adequate fire protection within external walls, including structural timber, should be exempt from the proposed ban, with mandated demonstration of fire safety engineered strategies.
- This issue of distinction was highlighted by the RIBA in 2018 to the MHCLG.
- Research by TRADA and BRE fire safety research concluded that *"timber frame [construction] performs as well as other construction in fire*."
- Temporary measures may be required until suitably developed methodologies have been established.
- The CCC explain that structural timber in particular offers many benefits when used safely:
    - Cross Laminated Timber structures contributes 60% less CO2 than equivalent concrete structures
    - Timber structures can sequester 400% more carbon than equivalent concrete structures
- The All-Party Parliamentary Group for the Timber Industries have found new homes built from timber structures could be:
    - 30% quicker to build
    - Reduce waste by 90% through offsite construction
    - Sequester 11 tonnes of CO2 per home (3 million tonnes in a study of 270,000 homes)
- A major developer cost comparison analysis of CLT vs RC (reinforced concrete) structure for a 7 storey building containing 251 residential units found an overall CLT cost saving of 4% (a saving of £75 / sqm) compared to RC, along with a carbon footprint reduction of circa 10,000mt (including -2,000mt from a 27% reduction in piles).
- As advised by the CCC, the UK Government should enact new policies to encourage the growth of the UK's timber manufacturing industry and sawmill capacity.
- Timber structures have been proven cheaper than conventional methods and less impactful on the community during construction due to fewer deliveries to site (eg. Waugh Thistleton Architects' 'Dalston Lane').
- There has already been significant development in research and investment into the use of timber structures in the UK, which has already been impacted by the current ban, and would be restricted further by the proposed ban.
- The UK would fall behind compared to other countries such as France and Norway in developments towards areas of net zero construction.

14b Are you aware of any particular equalities impacts for these proposals? How could any adverse impact be reduced and are there any ways we could better advance equality of opportunity or foster good relations between people who share a protected characteristic and those who do not? Please provide evidence to support your response.

- When forming all regulations and legislation, the Government should consider and adhere to climate change mitigation targets, which inherently promote equality by considering the needs of young people and future generations from all backgrounds.